

MODIFICATION PROPOSAL P11 – CONSULTATION RESPONSES

This annex contains the responses received to the P11 consultation and impact assessment:

- Section A2.1 contains the responses to the consultation.
- Section A2.2 contains the responses to Change Proposal Circular CPC052.

Further information on the consultation and assessment process leading to these responses is contained in section 12 of this report.

A2.1 – Consultation Responses

Representations were received from the following parties:

| No | Company | File Number |
|----|--|-------------|
| 1. | Electricity Direct | P11_ASS_001 |
| 2. | The European Power Source Company (U.K.) Limited | P11_ASS_002 |
| 3. | TXU | P11_ASS_003 |
| 4. | Innogy | P11_ASS_004 |
| 5. | British Gas Trading | P11_ASS_005 |
| 6. | SEEBOARD | P11_ASS_006 |
| 7. | British Energy Power & Energy Trading Ltd | P11_ASS_007 |
| 8. | London Electricity | P11_ASS_007 |

(The London Electricity response was received in response to the impact assessment rather than the consultation, but as it answered the consultation questions it was treated by the Modification Group as a consultation response.)

P11_ASS_001 – Electricity Direct

| Question | Response |
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| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel Modification Proposal P11 (as described in section 3 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>Modification P2 should be in place before Mod P11 is implemented (or the alternate). Having a fixed price of £50000 will hinder new entrants in to the market place.</p> |
| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel the Alternative Modification Proposal (as described in section 4 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>Because the credit cover is to be calculated on a 6 monthly basis it will detriment suppliers that are loosing customers as the credit cover will remain the same until recalculated. It will have the reverse effect for expanding customers. A supplier should be able to modify their credit cover at any time.</p> |
| <p>To the extent that you feel able to express a view, given that the costs of the two options will not be known until later in the Assessment Procedure, do you prefer:</p> <ul style="list-style-type: none"> • Modification Proposal P11 (as described in section 3 of this document). • The Alternative Modification Proposal (as described in section 4 of this document). • Neither (i.e. no change to the existing arrangements). | <p>Either the alternative Mod or no change (providing that MOD P2 is implemented). We would be against the original proposal P11.</p> |

| Question | Response |
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| <p>Sections 3 and 4 of this document suggest that the “Period for Provision of Minimum Credit Cover”, should last until the end of the second Business Day after the day on which the notice was issued to the Party. Is this an appropriate length of time, in your view?</p> | <p>This in our view is not an over stringent timetable but would prefer an extra working day for the provision of minimum credit cover. This would be more helpful to smaller suppliers as they do not readily have access to large funds</p> |
| <p>Section 4.3 describes a number of options for implementing the Alternative Modification Proposal, one of which uses data from the Interim Information run. Assuming that this would reduce the cost of implementation, would you regard it as acceptable?</p> | <p>Yes, however, a party that does not agree with the level should be allowed to appeal against the decision within a suitable time frame.</p> |
| <p>One of the features of the Alternative Modification Proposal is that the calculation and monitoring of Minimum Level of Credit Cover values takes place on an occasional basis (i.e. once every six months, and when the Party goes into credit default or reduces their Credit Cover). Section 4 of this document suggests that the key advantage of this is the potential cost saving, and that if in fact there is no cost saving, the calculation and monitoring should take place on a daily basis, as originally proposed in P11. Do you agree with this?</p> | <p>Yes. Have other time frames been considered, for example, a period of one month? This would have a more accurate reflection than the 6 monthly forecast and may not be as cost restrictive as a daily run.</p> |
| <p>Are there any other Alternative Modification Proposals that would, in your view, better achieve the Applicable BSC Objectives?</p> | <p>We believe that P2 is essential in this process in allowing actual data to be used instead of estimated information.</p> |

P11_ASS_002 – The European Power Source Company (U.K.) Limited

Thank you for the opportunity to comment as part of the Assessment Phase of Modification Proposal P11 – Revision of Minimum Credit Cover Requirements.

The European Power Source Company (U.K.) Limited supports the Alternative Modification Proposal to Modification Proposal P11. As the proposer of the original Modification Proposal P11, we regard the alternative proposal in its current form as significantly strengthening the existing processes for ensuring that Trading Parties have adequate cover in place without creating a barrier to entry for current or potential participants.

Marios Broustas
On Behalf of Anthony Gordon
Managing Director

P11_ASS_003 – TXU

In view of the decision to implement P2 we do not believe that either the original Proposal or the Alternative Proposal put forward by the Modification Group are likely to better achieve the relevant objectives.

| Question | Response |
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| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel Modification Proposal P11 (as described in section 3 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>No</p> |
| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel the Alternative Modification Proposal (as described in section 4 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>No</p> |
| <p>To the extent that you feel able to express a view, given that the costs of the two options will not be known until later in the Assessment Procedure, do you prefer:</p> <ul style="list-style-type: none"> • Modification Proposal P11 (as described in section 3 of this document). • The Alternative Modification Proposal (as described in section 4 of this document). • Neither (i.e. no change to the existing arrangements). | <p>Neither</p> |
| <p>Sections 3 and 4 of this document suggest that the “Period for Provision of Minimum Credit Cover”, should last until the end of the second Business Day after the day on which the notice was issued to the Party. Is this an appropriate length of time, in your view?</p> | <p>In view of reply to 3) – Not relevant</p> |
| <p>Section 4.3 describes a number of options for implementing the Alternative Modification Proposal, one of which uses data from the Interim Information run. Assuming that this would reduce the cost of implementation, would you regard it as acceptable?</p> | <p>In view of reply to 3) – Not relevant</p> |

| Question | Response |
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| <p>One of the features of the Alternative Modification Proposal is that the calculation and monitoring of Minimum Level of Credit Cover values takes place on an occasional basis (i.e. once every six months, and when the Party goes into credit default or reduces their Credit Cover). Section 4 of this document suggests that the key advantage of this is the potential cost saving, and that if in fact there is no cost saving, the calculation and monitoring should take place on a daily basis, as originally proposed in P11. Do you agree with this?</p> | Yes |
| <p>Are there any other Alternative Modification Proposals that would, in your view, better achieve the Applicable BSC Objectives?</p> | No |

P11_ASS_004 – Innogy

| Question | Response |
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| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel Modification Proposal P11 (as described in section 3 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>The Innogy Group believe that the use of the current credit calculations fail to facilitate the achievement of the Applicable BSC Objectives. Consequently, for P11 to have any relevance to the actual financial position of a participant, it should take account for the actual trading charges. We note that this is taken into account within the Alternative Modification. We also agree with the other views of the Modification group, that the £50k minimum is inappropriate and the sporadic calculation of MLCC should decrease the cost of the Modification. Consequently, we believe that the Modification fails to better facilitate the relevant BSC Objectives.</p> |
| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel the Alternative Modification Proposal (as described in section 4 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>Whilst we agree in principle that the Alternative Modification Proposal should decrease the risk of a participant defaulting without having provided adequate credit cover, we are sceptical of the actual practical benefit this will have. Consequently, we do not believe that the Alternative Modification better facilitates the relevant BSC Objectives, in that it is neither efficient nor economic, given that Modification P2 is due next year.</p> |
| <p>To the extent that you feel able to express a view, given that the costs of the two options will not be known until later in the Assessment Procedure, do you prefer:</p> <ul style="list-style-type: none"> • Modification Proposal P11 (as described in section 3 of this document). • The Alternative Modification Proposal (as described in section 4 of this document). • Neither (i.e. no change to the existing arrangements). | <p>Neither. We feel that the costs will outweigh any practical benefit of the Modification.</p> |

| Question | Response |
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| <p>Sections 3 and 4 of this document suggest that the “Period for Provision of Minimum Credit Cover”, should last until the end of the second Business Day after the day on which the notice was issued to the Party. Is this an appropriate length of time, in your view?</p> | <p>Yes. However, given that the Modification Proposal is meant to assist the security of the market, not inhibit trading, we would like to see this reviewed if it appears to be impractical.</p> |
| <p>Section 4.3 describes a number of options for implementing the Alternative Modification Proposal, one of which uses data from the Interim Information run. Assuming that this would reduce the cost of implementation, would you regard it as acceptable?</p> | <p>Yes, but only if the P2 adjustments to the Interim Initial run can be made in a timely manner. We would like clarification on whether this would mean that P11 could only be implemented at the same time as P2. If this is the case, the Innogy Group believe that P11 constitutes needless gold-plating.</p> |
| <p>One of the features of the Alternative Modification Proposal is that the calculation and monitoring of Minimum Level of Credit Cover values takes place on an occasional basis (i.e. once every six months, and when the Party goes into credit default or reduces their Credit Cover). Section 4 of this document suggests that the key advantage of this is the potential cost saving, and that if in fact there is no cost saving, the calculation and monitoring should take place on a daily basis, as originally proposed in P11. Do you agree with this?</p> | <p>Yes.</p> |
| <p>Are there any other Alternative Modification Proposals that would, in your view, better achieve the Applicable BSC Objectives?</p> | <p>Whilst Innogy believe there are no other Alternative Modifications that would better facilitate the Applicable BSC Objectives, we do not believe that the Alternative Modification better achieves the BSC Objectives either. We feel that this is inefficient and uneconomic in the light of changes already in progress, and consequently does not "promote efficiency".</p> |

P11_ASS_005 – British Gas Trading

| Question | Response |
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| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel Modification Proposal P11 (as described in section 3 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>P11 does not provide a good measure of potential indebtedness as</p> <ol style="list-style-type: none"> 1. Energy Indebtedness (EI) does not accurately reflect actual indebtedness, 2. Behaviour of a distressed party may change prior to default, invalidating historic data, 3. Due to the seasonal structure of EI values in one season may not be a good predictor of exposure in other periods. |
| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel the Alternative Modification Proposal (as described in section 4 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>Historic indebtedness is not necessarily a good measure of indebtedness if a part is in distress.</p> |
| <p>To the extent that you feel able to express a view, given that the costs of the two options will not be known until later in the Assessment Procedure, do you prefer:</p> <ul style="list-style-type: none"> • Modification Proposal P11 (as described in section 3 of this document). • The Alternative Modification Proposal (as described in section 4 of this document). • Neither (i.e. no change to the existing arrangements). | <p>Once P2 is implemented the credit arrangements in the BSC will be very robust. Calculated indebtedness will provide a good measure of actual indebtedness and the speed of the level ½ default process prevents large amounts of additional indebtedness being built up.</p> <p>If the industry feels that a minimum level of credit is required calculation using the alternative modification would be the preferred approach as it uses a measure of historic indebtedness that reflects actual indebtedness.</p> |

| Question | Response |
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| <p>Sections 3 and 4 of this document suggest that the “Period for Provision of Minimum Credit Cover”, should last until the end of the second Business Day after the day on which the notice was issued to the Party. Is this an appropriate length of time, in your view?</p> | <p>It would be appropriate to place participants into default when they still have unused credit without giving them banking time to post additional collateral.</p> |
| <p>Section 4.3 describes a number of options for implementing the Alternative Modification Proposal, one of which uses data from the Interim Information run. Assuming that this would reduce the cost of implementation, would you regard it as acceptable?</p> | |
| <p>One of the features of the Alternative Modification Proposal is that the calculation and monitoring of Minimum Level of Credit Cover values takes place on an occasional basis (i.e. once every six months, and when the Party goes into credit default or reduces their Credit Cover). Section 4 of this document suggests that the key advantage of this is the potential cost saving, and that if in fact there is no cost saving, the calculation and monitoring should take place on a daily basis, as originally proposed in P11. Do you agree with this?</p> | |
| <p>Are there any other Alternative Modification Proposals that would, in your view, better achieve the Applicable BSC Objectives?</p> | <p>Credit arrangements, once P2 is implemented, properly protect the market without imposing unnecessary costs.</p> |

P11_ASS_006 – SEEBOARD

We are concerned that these changes seem to overlap with a number of other initiatives. Our present understanding is that this new method will not fully replace the current method. As such this seems to be a piecemeal approach rather than dealing with a full end to end solution.

We therefore do not believe that Modification Proposal 11 is ready to take forward to the final assessment stage.

Sue Fraser
for DAVE MORTON
0190 328 3465

P11_ASS_007 – British Energy Power & Energy Trading Ltd

Response on behalf of British Energy Power & Energy Trading Ltd, British Energy

Generation Ltd & Eggborough Power Ltd

General Comments

On balance, although we cannot be sure that the proposal or alternative will better achieve the BSC objectives, we support the alternative proposal until such time as better methods can be found. We do not support the original proposal because of its use of estimated indebtedness rather than actual data.

Our understanding is that the proposal, if implemented, will examine a party's history of BSC balancing mechanism indebtedness over the past year to determine a minimum required credit level for the present, and that the proposal does not directly impact proposals to improve the calculation of current actual real indebtedness.

We note that a relatively short period of increased indebtedness (either due to balancing shortfall or extreme prices) could set a minimum credit level for the affected party for up to a year following. Practically, this would probably only significantly affect those parties whose indebtedness varies significantly with time and which currently provide credit cover less than historic maxima. However, occurrences of extreme prices could affect all parties with physical volumes subject to imbalance.

The proposal does not provide significant additional protection against parties with historically "good" balancing performance (including pure traders with closed positions at gate closure), nor does it protect against parties with a low credit rating or a history of late payment, or against further indebtedness which may arise after the credit problem is first identified.

More analysis would be required to make a definitive quantitative decision as to whether the proposal better achieves the BSC Objectives, there being a trade-off between the cost of providing possibly unnecessary credit cover and the probability and cost of payment default by parties. It is not obvious that past indebtedness is a clear indicator of future indebtedness and credit risk. We suspect that more effective methods of achieving real protection against payment default exist.

| Question | Response |
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| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel Modification Proposal P11 (as described in section 3 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>Pure Trading parties and parties performing 100% volume reallocation to others may have no imbalance and no real indebtedness under the BSC under normal circumstances. A £50K (or similar) minimum minimum credit amount applied to such parties is arbitrary, and since it provides little protection, is probably inefficient. The use of historic system calculated "Actual Indebtedness" into the minimum credit calculation will introduce unnecessary errors given availability of real indebtedness data.</p> |
| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel the Alternative Modification Proposal (as described in section 4 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>Increasing the indebtedness calculation period beyond 29 days could provide additional protection for additional debts occurring after a credit problem is identified.</p> <p>We do not believe that a "ceiling" (sic) minimum value of £50k would be effective or efficient. No such value should be specified. During the first 3 months of operation of a party, the "live" indebtedness checks against posted credit should suffice.</p> |
| <p>To the extent that you feel able to express a view, given that the costs of the two options will not be known until later in the Assessment Procedure, do you prefer:</p> <ul style="list-style-type: none"> • Modification Proposal P11 (as described in section 3 of this document). • The Alternative Modification Proposal (as described in section 4 of this document). • Neither (i.e. no change to the existing arrangements). | <p>The Alternative Modification is preferred to the original, but only slightly preferred to no change.</p> |

| Question | Response |
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| <p>Sections 3 and 4 of this document suggest that the "Period for Provision of Minimum Credit Cover", should last until the end of the second Business Day after the day on which the notice was issued to the Party. Is this an appropriate length of time, in your view?</p> | <p>Two days seems very short to organise increased credit cover (especially if method is Letter of Credit).</p> |
| <p>Section 4.3 describes a number of options for implementing the Alternative Modification Proposal, one of which uses data from the Interim Information run. Assuming that this would reduce the cost of implementation, would you regard it as acceptable?</p> | <p>II data quality, particularly imbalance price calculation and metered volumes, must improve before II data is used in credit calculations. Real indebtedness (from settlement payment runs) should be used for historic indebtedness calculations. We expect data quality at the Settlement Final run to improve with time.</p> |
| <p>One of the features of the Alternative Modification Proposal is that the calculation and monitoring of Minimum Level of Credit Cover values takes place on an occasional basis (i.e. once every six months, and when the Party goes into credit default or reduces their Credit Cover). Section 4 of this document suggests that the key advantage of this is the potential cost saving, and that if in fact there is no cost saving, the calculation and monitoring should take place on a daily basis, as originally proposed in P11. Do you agree with this?</p> | <p>Yes, if no increase in cost, the monitoring should be more frequent.</p> |
| <p>Are there any other Alternative Modification Proposals that would, in your view, better achieve the Applicable BSC Objectives?</p> | <p>If only.</p> |

P11_ASS_008 – London Electricity

| Question | Response |
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| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel Modification Proposal P11 (as described in section 3 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>This modification improves on the current situation as it reduces risks to participants, however we believe that a fixed minimum level of credit of £50k may distort competition as it may discriminate against smaller players.</p> <p>If it is expensive to calculate minimum levels on a daily basis it may be acceptable to calculate them less frequently.</p> |
| <p>Are there any specific issues that you feel the Modification Group should take into account when deciding whether or not to recommend to the Panel the Alternative Modification Proposal (as described in section 4 of this document). For example, do you believe that any specific feature of the Modification Proposal either facilitates, or fails to facilitate, achievement of the Applicable BSC Objectives?</p> | <p>The Alternative modification is preferable to the original, as it does not include the £50k minimum level of cover. The use of all trading charges in the calculation will give a far better indication of the real level of indebtedness than current estimates.</p> <p>Monitoring at the stated points should be sufficient but this should be reviewed at an appropriate time.</p> <p>Option A would be better for calculating the MLCC as it would avoid arranging two changes to the Letter of Credit. This would have to be within the time scales permitted by ordinary banking hours.</p> |
| <p>To the extent that you feel able to express a view, given that the costs of the two options will not be known until later in the Assessment Procedure, do you prefer:</p> <ul style="list-style-type: none"> • Modification Proposal P11 (as described in section 3 of this document). • The Alternative Modification Proposal (as described in section 4 of this document). • Neither (i.e. no change to the existing arrangements). | <p>We prefer the alternative modification because it will be more inclusive of competition by not having a minimum credit level of £50k.</p> |

| Question | Response |
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| <p>Sections 3 and 4 of this document suggest that the “Period for Provision of Minimum Credit Cover”, should last until the end of the second Business Day after the day on which the notice was issued to the Party. Is this an appropriate length of time, in your view?</p> | <p>Yes, two days is the minimum amount of time as this should be sufficient for cover to be arranged.</p> |
| <p>Section 4.3 describes a number of options for implementing the Alternative Modification Proposal, one of which uses data from the Interim Information run. Assuming that this would reduce the cost of implementation, would you regard it as acceptable?</p> | <p>The Interim Information run will not include adjustments for modification P18a. This may have a large effect on the level of system prices and could lead to large distortions to the level of credit required. If modification P18a can be incorporated into the II run then we would accept its use. Otherwise we would prefer the full solution providing the cost is not prohibitive.</p> |
| <p>One of the features of the Alternative Modification Proposal is that the calculation and monitoring of Minimum Level of Credit Cover values takes place on an occasional basis (i.e. once every six months, and when the Party goes into credit default or reduces their Credit Cover). Section 4 of this document suggests that the key advantage of this is the potential cost saving, and that if in fact there is no cost saving, the calculation and monitoring should take place on a daily basis, as originally proposed in P11. Do you agree with this?</p> | <p>If there is no difference in cost we prefer daily monitoring. If this is too expensive we suggest that monthly monitoring is appropriate. A review of the frequency of monitoring may be required if this alternative option is selected.</p> |
| <p>Are there any other Alternative Modification Proposals that would, in your view, better achieve the Applicable BSC Objectives?</p> | |

A2.1 – Impact Assessment Responses

The responses received to the impact assessment (CPC052) are summarised in the following table:

| Party | Approve / Reject | Comments |
|--|------------------|---|
| Tony Harris London Power Networks (London SMRA Agent) | Approve | I agree with the proposed changes. Impact - No We will require 0 day's notification prior to implementation of the changes Comments: As a Distribution Business we are in favour of a change that allows for greater confidence in the effectiveness of determining and maintaining adequate Security Cover of market participants. |
| Andy Kirby Maverick Energy | Reject | I disagree with the proposed changes. Impact – Yes. We will require as many days notification as possible, prior to the implementation of the changes. Comments: Our current position has proved to be more than adequate. A change is unnecessary in our view. |
| Helen Lees Npower Ltd | Reject | I disagree with the proposed changes. Comments: We disagree to the proposed changes on the grounds that they will require significant system changes, and the introduction of manual processes, the cost of which we believe outweighs any benefit of introducing the change. Particularly, bearing in mind that P2 will be introduced in September 2002 which will resolve the issues. |
| Helen Lees Npower Yorkshire Ltd | Reject | I disagree with the proposed changes. Comments: We disagree to the proposed changes on the grounds that they will require significant system changes, and the introduction of manual processes, the cost of which we believe outweighs any benefit of introducing the change. Particularly, bearing in mind that P2 will be introduced in September 2002 which will resolve the issues. |
| Rachael Gardener GPU Power UK | Reject | No Comment. |
| Dave Morton SEEBOARD | Reject | I disagree with the proposed changes Comments: We are concerned that these changes seem to overlap with a number of other initiatives. Our present understanding is that this new method will not fully replace the current method. As such this seems to be a piecemeal approach rather than dealing with a full end to end solution. We therefore do not believe that Modification Proposal 11 is ready to take forward to the final assessment stage. |
| Anne Stone London Electricity | Approve | I agree with the proposed changes. Impact – Yes Comments: See attachment |

| Party | Approve / Reject | Comments |
|--|------------------|--|
| Edward Coleman TXU | Reject | I disagree with the proposed changes. Impact –Yes. Comments: This would mean significant change to our systems and dependent upon which option is chosen would have between 50 and 90 man-days of effort. |
| Stephen Mooney Bridge of Cally Energy Investments Ltd. | Reject | I disagree with the proposed changes. Impact – Yes. Notification required – 31 days. |
| Corrina Harvey IMServ Europe | | Comment – No Impact |
| Clive Cushen ELEXON Ltd. | | Impact – Yes Comments: The following Design Authority maintained products are impacted by this Modification and apply equally to P11 and the Alternative: Business Process Model - estimated 4 mandays inc. reviews. Neta Data File Catalogue - estimated 3 mandays inc. reviews. Reporting Catalogue - estimated 2 mandays inc. reviews. |