

ASSESSMENT CONSULTATION for Modification Proposal P219 Consistency between Forecast and Out-turn Demand

Prepared by P219 Modification Group

For Review	Date of Issue	24 January 2008	Version Number	1.0
For Attention Of	BSC Parties and other interested parties (including Demand Side Working Group Members)			
Responses Due	5pm on 1 February 2008 to: modification.consultations@elexon.co.uk			
Overview or Purpose of Document:				
<p>Proposed Modification P219 seeks to address potential ambiguity surrounding the forecast and out-turn data reported on the BMRS (Balancing Mechanism Reporting System) and to align the BSC definitions with that of the Grid Code. P219 aims to achieve this by providing two sets of data to the BMRS for both Demand Forecast and Demand Out-turn. P219 will introduce into the BSC the definition of Transmission System Demand and amend several definitions as stated in the Modification Proposal, all of which will be aligned with the definitions contained within the Grid Code.</p> <p>No Alternative Modification has been developed.</p>				
Purpose of Consultation				
This consultation seeks respondents views regarding P219 and, in particular:				
<ul style="list-style-type: none">• Whether the Proposed Modification would better facilitate the achievement of the Applicable BSC Objectives¹ when compared to the current Code baseline;• To Identify and quantify, where possible, any benefits from Proposed Modification P219; and• Whether those benefits outweigh implementation costs; and				
You are invited to respond to the questions contained in the attached pro-forma.				
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¹ A copy of the Applicable BSC Objectives is provided in Appendix 1.

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Summary of Impacted Parties and Documents

As far as the Modification Group has been able to assess, the following parties/documents would be impacted by P219.

Please note that this table represents a summary of the full impact assessment results in Appendix 3.

Parties		BSC Sections		Code Subsidiary Documents	
Distribution System Operators	<input type="checkbox"/>	A	<input type="checkbox"/>	BSC Procedures	<input type="checkbox"/>
Generators	<input checked="" type="checkbox"/>	B	<input type="checkbox"/>	Codes of Practice	<input type="checkbox"/>
Interconnectors	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	BSC Service Descriptions	<input checked="" type="checkbox"/>
Licence Exemptable Generators	<input checked="" type="checkbox"/>	D	<input type="checkbox"/>	Party Service Lines	<input type="checkbox"/>
Non-Physical Traders	<input checked="" type="checkbox"/>	E	<input type="checkbox"/>	Data Catalogues	<input type="checkbox"/>
Suppliers	<input checked="" type="checkbox"/>	F	<input type="checkbox"/>	Communication Requirements Document	<input type="checkbox"/>
Transmission Company	<input checked="" type="checkbox"/>	G	<input type="checkbox"/>	Reporting Catalogue	<input type="checkbox"/>
Party Agents		H	<input type="checkbox"/>	Core Industry Documents	
Data Aggregators	<input type="checkbox"/>	I	<input type="checkbox"/>	Ancillary Services Agreement	<input type="checkbox"/>
Data Collectors	<input type="checkbox"/>	J	<input type="checkbox"/>	Data Transfer Services Agreement	<input type="checkbox"/>
Meter Administrators	<input type="checkbox"/>	K	<input type="checkbox"/>	Distribution Code	<input type="checkbox"/>
Meter Operator Agents	<input type="checkbox"/>	L	<input type="checkbox"/>	Distribution Connection and Use of System Agreement	<input type="checkbox"/>
ECVNA	<input type="checkbox"/>	M	<input type="checkbox"/>	Grid Code	<input type="checkbox"/>
MVRNA	<input type="checkbox"/>	N	<input type="checkbox"/>	Master Registration Agreement	<input type="checkbox"/>
BSC Agents		O	<input type="checkbox"/>	Supplemental Agreements	<input type="checkbox"/>
SAA	<input type="checkbox"/>	P	<input type="checkbox"/>	Use of Interconnector Agreement	<input type="checkbox"/>
FAA	<input type="checkbox"/>	Q	<input checked="" type="checkbox"/>	BSCCo	
BMRA	<input checked="" type="checkbox"/>	R	<input type="checkbox"/>	Internal Working Procedures	<input type="checkbox"/>
ECVAA	<input type="checkbox"/>	S	<input type="checkbox"/>	BSC Panel/Panel Committees	
CDCA	<input type="checkbox"/>	T	<input type="checkbox"/>	Working Practices	<input type="checkbox"/>
TAA	<input type="checkbox"/>	U	<input type="checkbox"/>	Other	
CRA	<input type="checkbox"/>	V	<input checked="" type="checkbox"/>	Market Index Data Provider	<input type="checkbox"/>
SVAA	<input type="checkbox"/>	W	<input type="checkbox"/>	Market Index Definition Statement	<input type="checkbox"/>
Teleswitch Agent	<input type="checkbox"/>	X	<input checked="" type="checkbox"/>	Connection and Use of System Code	<input type="checkbox"/>
BSC Auditor	<input type="checkbox"/>	Z	<input type="checkbox"/>	System Operator-Transmission Owner Code	<input type="checkbox"/>
Profile Administrator	<input type="checkbox"/>			Transmission Licence	<input type="checkbox"/>
Certification Agent	<input type="checkbox"/>				
Other Agents					
Supplier Meter Registration Agent	<input type="checkbox"/>				
Unmetered Supplies Operator	<input type="checkbox"/>				
Data Transfer Service Provider	<input type="checkbox"/>				

1 Purpose for second Consultation

The initial P219 Assessment Report was presented to the BSC Panel on 17 January 2008. The Panel agreed that further evidence was required on the likely benefits of P219 (whether tangible or intangible) in order for a decision to be made and that further assessment of P219 should be undertaken.

The Panel has requested that ELEXON issue a further consultation so that Parties may have the opportunity to consider costs of the Proposed Modification P219 (which were not available when the previous consultation was issued) when assessing whether P219 better facilitated the achievement of the Applicable BSC Objectives. Understanding the difficulty in obtaining benefits by way of a consultation the Panel suggested that the document describe a number of potential benefits and ask Parties if they could quantify the value of these benefits on a confidential basis. Examples of such benefits have been described within this Consultation document.

Respondents are urged to describe as fully as possible whether the potential P219 benefits arising will give Parties a material benefit or provide a benefit to the industry as a whole. Respondents are also requested to quantify such benefits where possible.

The purpose of this second Consultation is to get a better understanding of the detail of benefits of Modification P219 in order to weigh against the costs of implementation.

The BSC implementation costs for P219 are approximately £ 180,000 (please refer to Section 6 for a detailed breakdown) and implementation costs for National Grid are £ 300,000. This puts the total implementation cost for P219 at £ 480,000.

2 Introduction (Summary of first Consultation)

As part of the initial Assessment Procedure Consultation (issued on 27 November 2007) participants were asked whether they believed that the Proposed Modification P219 better facilitated the Applicable BSC Objectives (b), (c) and (d). At the time the initial consultation was issued, a detailed impact assessment outlining the implementation costs of the Proposed were not available for BSC Parties. The unanimous view from consultation respondents was that the increase in transparency and consistency would be beneficial to all participants but did not quantify this benefit in sufficient detail for the Panel to make a considered recommendation.

The 7 responses (39 BSC Parties and 1 non party) indicated that there were no possible alternate solutions for P219 which mirrored the view of the P219 Modification Group, that P219 was well defined.

There were no comments regarding the display of data on the BMRS. The Consultation and Impact Assessment for P219 were issued in parallel to allow P219 to meet its two month Assessment Procedure timetable.

When asked how respondents would use the P219 data items, respondents stated that:

- Data would be used as a comparable data set to offset errors in own demand data, thereby reducing imbalance costs;
- To review quality of forecast data;
- To assist operational business decisions; and
- To assist trading, balancing and demand triad forecasting activities;

Respondents felt that P219 would benefit to smaller and new market participants. Respondents also felt that the provision of transparent and readily available information should increase competition in the market.

None of the Respondents felt that implementation of P219 brought about any confidentiality issues.

The other comments made by respondents were:

- That the value of such information to the market is difficult to realise until such information is made available and is understood by the relevant market participants;
- A Demand reporting system more harmonised with gas;
- The main beneficiaries could be small Half Hourly customers on day-ahead contracts.
- Implementation before the **next** triad season as opposed to **during** a triad season would be preferable in order to avoid changes to the respondent's monitoring systems.

3 Potential P219 benefits

The Group has suggested the following examples to demonstrate how a benefit may be realised under P219. The benefit may be to the industry as a whole or to individual (small or new market participants) Parties. This consultation seeks views and any quantification of these potential benefits through the attached consultation questions.

1. Reduction in total market Imbalance:

If you believe that a percentage of the total market Imbalance cash flow could be attributed to inconsistency in the current forecast data available (i.e. through inability of Parties to better balance their Settlement positions), then the publication of consistent data should improve the overall level of Imbalance. The total Market Imbalance cash flow for the year 2007 (1/1/2007 to 31/12/2007) was approximately £158 million. Even a very small percentage saving in the total Imbalance Charges would outweigh the implementation costs of P219 and we would therefore welcome industry views on the likely impact of P219 (if any) on the level of imbalance.

If it is assumed that the total market Imbalance cost remains constant at the 2007 level of £158 million, the Net Present Value of the Imbalance Charges over a five year period (assuming a discount rate of 5%) would be £684 million.

Total imbalance cost in first year (£m):	158
Discount rate:	5%
Net present value of imbalance costs (£m):	684.06 ²

The cost of implementing P219 is approximately £ 480,000 which is 0.07% of the total market Imbalance for five years. Thus in order to achieve a net positive benefit in implementing P219, the market Imbalance must reduce by 0.07%.

² NPV = $\sum(\text{Total imbalance cost})/(1+\text{discount rate})$

	P219
Implementation Cost (£k)	480
%age:	0.07%

$$\text{i.e. } \frac{480,000}{684,060,000} = 0.0007$$

$$= 0.07\%$$

Question 5 in the P219 Consultation questionnaire seeks your views on this assumption, and whether P219 would have any impact in reducing Imbalance costs due to erroneous Forecasting, and as a consequence the total market Imbalance.

2. Reduction in third party costs (e.g. Energy Consultancies)

Market participants may not have access to clear and consistent information, including Demand Forecast and Out-turn information. As a consequence such participants may use the services provided by energy consultancies in order to Forecast their market Settlement positions. Additionally the value of information could be confirmed by the presence of commercial publications as they reduce search costs and pool resources to understand the market.

Thus it could be said that:

- a Energy buyers are prepared to pay for information on and about the market;
- b A subscription to a Heren market report costs approximately £1,900 per year per user based on 2005 prices;
- c A subscription from Enapps which would allow a user to browse basic market information costs approximately £3000 per year per user;
- d A subscription to other commercial market reports is at least £1500 per year and above e.g. subscription from Platts, Mc Closky's etc.
- e Cost of making buying mistake due to lack of knowledge about the market could prove disastrous.

Additionally Parties may wish to currently receive this comparable forecast and out-turn data and the value of such comparable information may hold. Your views would be welcomed on what a Party would be prepared to pay for such information.

Questions 6 and 7 of the Consultation questionnaire seek to address whether the data items proposed under P219 could have any impact on third party costs and the value of the P219 information. Parties are invited to indicate if their response is confidential and this will be anonymised by ELEXON with the detail provided only to the Panel and Ofgem.

3. Value of transparent and consistent information

In addition to the arguments made in the initial P219 Assessment Procedure consultation (listed in section 2 of this document), it could be argued that:

- New market entrants need to understand the market for e.g. the inconsistent data items that are reported on the BMRS.
- The provision of clear transparent information enables the participants to make better informed decisions and as a consequence improve market efficiency and competition
- Maintenance of infrastructure to obtain information for forecasting market Settlement positions is eased.

- This may have cost implications in enabling IT systems to be compatible with the data items proposed under P219.

Question 8 of the Consultation questionnaire seeks respondents views on whether there may be any benefit of transparent and consistent information proposed under P219.

4 Implementation Approach and Costs

4.1 Modification Group's Discussions

The Group proposed a combination of implementation options based on the assumptions of the Transmission Company's lead time of 4 months and a BSC Agent lead time of 4½ months:

- 6th November 2008 if a decision is reached on 29th May 2008 **or** June 2009 if a decision is reached after 29th May 2008 but before 15th January 2009.
- A combined cost benefit (cost saving) will be achieved if a decision is reached before or by 3rd April 2008, for both P219 and P220, with an implementation date of 6th November 2008.

5 Results of Proposed Modification Impact Assessment

The table below indicates the estimated Implementation costs for P219 as a standalone project in either a November 2008 or June 2009 release. Please note that:

- Currently BSC Agent services are the subject of a procurement exercise through ELEXON's Project Isis and that suggested release dates will interact with the new BMRA system and the chosen Service Provider.
- **Impact assessment costs for P219 without the High Grade BMRA website are shown in brackets.**
- ELEXON has estimated an additional cost for a new Service Provider (**£30,000 for November 2008 and £60,000 for a June 2009 Implementation date**) to test and deploy the ported software. It should be noted that this cost is an estimate with a wide tolerance and a more accurate estimate will not be available until the chosen Service Provider is appointed.
- For a November 2008 Implementation Date, there are costs for development and deployment on the **existing Tru-64 system** and an **additional cost to port** the changes to the **new HP-UX and Oracle 10g system**.
- For June 2009 the changes brought about by P219 would be directly implemented into the **new HP-UX and Oracle 10g system** with no porting required and thus the overall cost estimate would be slightly lower.

PROPOSED MODIFICATION IMPLEMENTATION COSTS³

		November 2008	June 2009	Tolerance
Service Provider⁴ Cost	Development, testing & deployment	£ 130,800 (£ 117,900)	£ 140,600 (£ 126,700)	+/-30%
	Porting	£ 21,000 (£22,400***)	N/A	+/-30%
	Total Service Provider Cost	£ 151,800 (£140,300***)	£ 140,600 (£126,700***)	+/-30%
Implementation Cost	External Audit	£ Nil	£ Nil	N/A
	Design Clarifications	£ Nil	£ Nil	N/A
	Additional Resource Costs	£ Nil	£ Nil	N/A
	Additional Testing and Audit Support Costs	£ Nil	£ Nil	N/A
Total Demand Led Implementation Cost	£ 151,800 (£140,300***)	£ 140,600 (£126,700***)	N/A	

ELEXON Implementation Resource Cost (waiting for these to come in)		184 Man days £40,480	184 man days £40,480	+/- 40%
Total BSC Implementation Cost		£ 180,780	£ 176,180	+/- 35%
National Grid Cost⁵		£ 300,000	£ 300,000	n/a
Total Implementation Cost		£ 480,780	£ 476,180	+/- 35%

³ An explanation of the cost terms used in this section can be found on the BSC Website at the following link: http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

⁴ BSC Agent and non-BSC Agent Service Provider and software costs.

⁵ Please note that National Grid costs are not recovered under the BSC.

*** Please note that any June 2009 delivery will have to be re-assessed once the 'Application Management and Development' contract extension terms have been agreed. The complete costs for June 2009 are not known as the contract with the current Service Provider (BSC Agent) ends and they are dependent on the agent that is procured.

a) BSC Agent Impact

NOTE: There are other changes in the industry that could impact P219. CP1217 'Discontinuing the BMRS High Grade website' could potentially have an impact on P219 costs but would not affect the implementation of P219 if it were to be approved.

The BMRA would be required to amend and test its systems in order to publish the data made available under P219. The changes would include a Summary page (scheduled for Q1 2008), additional data items on each existing graph with the option to toggle ON or OFF different data sets and the creation of new TIBCO messages.

The costs and lead time provided by the BSC Agent is best summarised in the following table. Currently four options exist whereby:

- Implemented in November 2008 on the current Live Tru-64 system and later ported to the HP-UX/10g system **with** the High Grade website (without CP1217).
- Implemented in November 2008 on the current Live Tru-64 system and later ported to the HP-UX/10g system **without** the High Grade website (with CP1217).
- Implemented in June 2009 on the new HP-UX/10g system **with** the High Grade website (without CP1217).
- Implemented in June 2009 on the new HP-UX/10g system **without** the High Grade website (with CP1217).

There is a cost saving if P219 were to be implemented without the High Grade BMRA website where the cost saving for a November 2008 release would be approximately £21,500 and approximately £34,100 if for a June 2009 implementation.

The BSC Agent advised that there could be a cost saving if P219 and P220 were implemented together but that the P220 assessment was not complete. As a consequence the BSC Agent suggested that any possible implementation savings will be identified more fully in the forthcoming P220 Assessment, the details of which can be found in the forthcoming P220 Consultation.

b) BSC Party and Party Agent Impact

Respondents (two out of three) noted that there would be some impact on their systems but they did not expect the costs to be excessive and would require at least three months notice to implement the required changes. Further information and a list of Impacts can be found in Appendix 4 of the P219 Assessment report.

c) Transmission Company Impact

The Transmission Company has suggested that there is no direct impact on the ability of the Transmission Company to carry out its obligations efficiently under the Transmission Licence. The Transmission Company suggested that system and documentation changes are needed and that there is a £100,000 initiation cost, part of which has already been met by undertaking feasibility assessment work for improvements to information provision. The total estimated cost quoted by the Transmission Company is £300,000 with an implementation timescale (P219 only) of 3 to 4 months.

The Transmission Company noted in its analysis a cost saving of £200,000 from the total summated costs for P219 and P220, if both P219 and P220 were to be implemented together with an estimated implementation timescale of 6 months.

A detailed impact assessment for the Transmission Company can be found in Appendix 4 of the P219 Assessment Report.

d) BSCCo Impact

BSCCo would require approximately 6 months to Implement P219.

BSCCo would be required to:

- Make changes to the impacted CSDs, carry out testing on the amended software;
- Update Local Working Instructions to reflect the new processes; and
- Provide assurance to the implementation project.

In total this would require 184 man days of effort for either a November 2008 or June 2009 release. However the costs for a November 2008 release would amount to £480,780 and £476,180 for a June 2009 release. For a detailed list of impacts please see Appendix 4 of the P219 Assessment Report.

6 Summary of Modification Group's Assessment (from the initial P219 Consultation)

6.1 Assessment of Applicable BSC Objectives

The majority view of the Modification Group was that the Proposed Modification would better facilitate the achievement of **Applicable BSC Objectives (b), (c) and (d)** when compared to the current Code baseline for the following reasons:

Applicable BSC Objective (b)

The majority of the Group believed that the Proposed Modification P219 better facilitated Objective (b) for the following reasons:

- The provision of consistent and transparent information should improve self-balancing by the market participants and therefore help improve the efficient, economic and co-ordinated operation of the GB Transmission System. P219 would also lessen the number of queries to the Transmission Company regarding the current inconsistencies in Demand data; and
- Any benefits gained from consistent and clear information outweigh the implementation costs.

The remaining Group member who did not feel that P219 better facilitated this BSC Objective stated that P219 had no impact on the achievement of this Applicable BSC Objective and therefore remained neutral.

Applicable BSC Objective (c)

The majority of the Group believed P219 better facilitated Applicable Objective (c) by removing the current ambiguity in Demand data and increasing the availability of improved market information to all participants. As a consequence, the Group felt that this would enable smaller market participants to compete against more established participants thereby promoting effective competition.

The remaining Group member held that there was a marginal gain from this consistent and transparent market information and therefore was neutral on BSC Objective (c).

Applicable BSC Objective (d)

The majority of the Group felt that P219 would better facilitate BSC Objective (d) as in their judgment P219 would lessen the number of queries to ELEXON with respect to the defect that P219 seeks to address.

The opposing Group member held that there was little evidence that P219 benefits smaller market participants. The member mentioned the lack of dialogue from smaller market participants (regarding P219) and the high impact assessment costs could not be justified. Thus the Group member held that P219 would not better facilitate BSC Objective (d).

6.2 Modification Group's Conclusions

The Group discussed the potential implementation options as described in Section 4 and acknowledged the uncertainties in relation to costs for a June 2009 release and preferred a November 2008 implementation.

The Group examined the lead times for the Transmission Company as 4 months, BSCCo as 6 months and that of the BSC Agent as 4.5 months and proposed a combination of implementation options that are described in Section 4 (above).

The Group accepted that there would be additional cost savings if a decision from the Authority for both P219 and P220 was received in April 2008 for a combined November 2008 release.

With respect to triad seasons a Modification Group member stated that in his opinion there was no impact of P219 on the triad forecasting.

In summary, the Modification Group agreed to the Proposed Modification P219 and therefore recommended the following implementation approach for P219:

- An Implementation Date for the Proposed Modification of 6th November 2008 if an Authority decision is received on or before 29th May, or June 2009 if the Authority decision is received after 29th May but on or before 15th January 2009;
- If a cost saving for both P219 and P220 is sought, the Authority would be required to make a decision on or before 3rd April 2008 for a combined P219 and P220 implementation in November 2008 **or** 23rd October 2008 for a combined implementation in June 2009.

7 Document Control

7.1 Authorities

Version	Date	Author	Reviewer	Reason for review
0.1	21/01/2008	Sherwin Cotta	Richard Clarke	For peer review
0.2	23/01/2008	Sherwin Cotta	John Lucas	For technical review
0.3	23/01/2008		P219 Modification Group	For Modification Group review
1.0	24/01/2008	P219 Modification Group	BSC Parties and other interested parties	For industry consultation

7.2 References

All related P219 documentation can be found at:

<http://www.elexon.co.uk/changeimplementation/ModificationProcess/ModificationDocumentation/modProposalView.aspx?propID=239>

Ref.	Document Title	Owner	Issue Date	Version
1	P219 Assessment Report http://www.elexon.co.uk/documents/Change_and_Implementation/modifications/219/P219_Assessment_Report_Attachments.zip	ELEXON	17/01/2008	1.0
2	CP1217 'Discontinuing the High Grade BMRS website' http://www.elexon.co.uk/changeimplementation/ChangeProcess/proposals/proposal_details.aspx?proposalId=715	ELEXON	9/11/07	1.0

Appendix 1: Applicable BSC Objectives

For reference the Applicable BSC Objectives, as contained in the Transmission Licence, are:

- a The efficient discharge by the licensee [i.e. the Transmission Company] of the obligations imposed upon it by this licence [i.e. the Transmission Licence];
- b The efficient, economic and co-ordinated operation of the GB transmission system;
- c Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;
- d Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

Appendix 2: Process Followed

Date	Event
26/10/2007	Modification Proposal raised by National Grid
09/11/2007	IWA presented to the Panel
13/11/2007	First Assessment Procedure Modification Group meeting held
27/11/2007	Requirements Specification issued for BSC Agent impact assessment
27/11/2007	Request for Party/Party Agent impact assessments request issued
27/11/2007	Request for Transmission Company analysis issued
27/11/2007	Request for BSCCo impact assessment issued
10/12/2007	BSC Agent impact assessment response returned
10/12/2007	Party/Party Agent impact assessment responses returned
10/12/2007	Transmission Company analysis returned
10/12/2007	BSCCo impact assessment returned
12/12/2007	Second Modification Group meeting held
17/01/2008	P219 Assessment Report presented to Panel
23/01/2008	Third Modification Group meeting held
24/01/2008	P219 issued for second consultation