



## CONSULTATION DOCUMENT VOLUME 1

### **CUSC Amendment Proposal CAP187 Code Governance Review: Environmental Assessment and the Relevant Objectives**

*The purpose of this document is to  
consult on Amendment Proposal CAP187  
with CUSC Parties and other interested  
Industry members*

Amendment Ref	CAP187
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Prepared by	National Grid

**Please note responses to this consultation are due by 5pm on  
5<sup>th</sup> August 2010 to [cusc.team@uk.ngrid.com](mailto:cusc.team@uk.ngrid.com)**

<b>I DOCUMENT CONTROL</b>
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**a National Grid Document Control**

Version	Date	Author	Change Reference
1.0	14/07/10	National Grid	Version for Publication

**b Distribution**

Name	Organisation
The Gas and Electricity Markets Authority	Ofgem
CUSC Parties	Various
Panel Members	Various
National Grid Industry Information Website	

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## **1.0 SUMMARY AND RECOMMENDATIONS**

### **Executive Summary**

- 1.1 CAP187 'Code Governance Review: Environmental Assessment and the Relevant Objectives' is part of a series of proposals raised by Electricity Transmission plc (National Grid) to implement the Final Proposals of the wider Code Governance Review, initiated by Ofgem in November 2007. The review sought to address the concerns that the existing code arrangements may be too complex and inaccessible to smaller market participants. Following an Industry Workshop, this Amendment Proposal was presented to a Special CUSC Amendments Panel meeting on 9<sup>th</sup> July 2010. It was recommended that this Amendment Proposal proceeds directly to wider consultation by The Company.
- 1.2 CAP187 seeks to incorporate into the CUSC the requirement that an evaluation of the quantifiable impact of an Amendment Proposal on greenhouse gas emissions should be conducted, where the impact is likely to be material and in accordance with guidance issued by the Authority. This is part of the mandatory requirements under the new Electricity Transmission Licence Modifications which were implemented on 5<sup>th</sup> July 2010.

### **Amendment Panels View**

- 1.4 At the Special Amendments Panel meeting on 9<sup>th</sup> July 2010, the Panel agreed that CAP187 should proceed directly to wider consultation by the Company for a period of three weeks.

### **National Grid's View**

- 1.5 As Proposer, National Grid supports the implementation of CAP187 on the basis that it better facilitates the Applicable CUSC Objectives by adhering to the mandatory requirements under the revised Electricity Transmission Licence.

## 2.0 PURPOSE AND INTRODUCTION

- 2.1 This is a consultation document issued by National Grid under the rules and procedures specified in the Connection and Use of System Code (CUSC) as designated by the Secretary of State.
- 2.2 Further to the submission of Amendment Proposal CAP187, this document seeks views from industry members relating to the Amendment Proposal.
- 2.3 CAP187 was proposed by National Grid and submitted to the CUSC Amendments Panel for consideration at their meeting on 9<sup>th</sup> July 2010. Following an Industry Workshop and discussions as part of all of the Proposals at the Governance Standing Group, the Amendments Panel determined that CAP187 was appropriate to proceed to wider industry consultation by National Grid.
- 2.4 Representations received in response to this consultation document will be included in National Grid's Amendment Report that will be furnished to the Authority for their decision.
- 2.6 This consultation document has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website, at [www.nationalgrid.com/uk/Electricity/Codes/](http://www.nationalgrid.com/uk/Electricity/Codes/). This document invites views upon CAP187 and the **closing date for responses is 5pm on 5<sup>th</sup> August 2010.**
- 2.7 The Consultation timetable is attached as Annex 4 to this document.

### **3.0 PROPOSED AMENDMENT**

- 3.1 CAP187 proposes that Working Groups and the Panel carry out an assessment of the impact of an Amendment Proposal on greenhouse gas emissions, where the impact is likely to be material, as part of their deliberations. This is part of a suite of work strands conducted during the Code Governance Review.
- 3.2 This Proposal was presented to the Industry at an Industry Workshop on 23<sup>rd</sup> June 2010 and followed up at GSG meetings on 28<sup>th</sup> June 2010 and 1<sup>st</sup> July 2010. The Amendment Proposal was then presented to the Amendments Panel on 9<sup>th</sup> July 2010. At the Panel meeting, an accidental omission was identified in the legal text which the Panel agreed should be amended prior to sending CAP187 to consultation. In addition, the Authority Representative notified the Panel of the publication of an updated version of the guidance. The legal text and updated guidance are provided as Annex 2 and 3 of this consultation document.
- 3.3 CAP 187 requires that an evaluation of the quantifiable impact of an Amendment Proposal on greenhouse gas emissions needs to be conducted when preparing and consulting on an Amendment Report, where the impact is likely to be material and in accordance with guidance issued by the authority. Where relevant this evaluation should be undertaken for both original and alternative solutions.
- 3.4 When assessing against the Applicable CUSC Objectives, if the Panel considers that the Proposal may have a material impact on greenhouse gas emissions, then the environmental costs and benefits associated with the emissions should be assessed using the latest guidance. Currently the latest guidance is dated July 2010.

### **6.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES**

#### **Proposed Amendment**

- 6.1 The Proposer considers that CAP187 would better facilitate the CUSC Objective(s);

**(a) the efficient discharge by the Licensee of the obligations imposed upon it by the act and the Transmission Licence;**

This is a mandatory requirement under the new Electricity Transmission Licence Modifications which were implemented on 5<sup>th</sup> July 2010.

### **7.0 PROPOSED IMPLEMENTATION**

- 7.1 National Grid proposes CAP187 should be implemented 10 business days after an Authority decision. In accordance with 8.19.10(b) views are invited on this proposed implementation date.

### **8.0 IMPACT ON THE CUSC**

- 8.1 CAP187 requires amendments to Section 8 of the CUSC in relation to requiring Working Groups and the Amendments Panel to assess the quantifiable impact of an Amendment Proposal on greenhouse gas emissions, where applicable. The findings would subsequently be included in the Amendment Report and therefore an addition is required in Section 8 to include this provision.
- 8.2 The CUSC will also require an addition to incorporate the views of the Proposer on the CUSC Amendment Proposal Form as to whether they believe that their Proposal has an impact on greenhouse gas emissions and, if so, what they believe that impact to be.

## **9.0 IMPACT ON INDUSTRY DOCUMENTS**

### **Impact on Core Industry Documents**

- 9.1 CAP187 has no impact upon Core Industry Documents.

### **Impact on other Industry Documents**

- 9.2 CAP187 has no impact upon other Industry Documents, however, National Grid intends to raise similar proposals to both the Balancing and Settlement Code (BSC) and the Uniform Network Code (UNC) in line with the timetable which has been published to the industry in June 2010.

## **10.0 NATIONAL GRID VIEW**

- 10.1 As Proposer, National Grid supports the implementation of CAP187 on the basis that it better facilitates the Applicable CUSC Objectives by adhering to the mandatory requirements in its Electricity Transmission Licence.

## **11.0 VIEWS INVITED**

- 11.1 National Grid is seeking the views of interested parties in relation to the issues raised by Amendment Proposal CAP187 and issues arising from the proposed timescale for implementation of CAP187.
- 11.2 Please send your responses to this consultation to National Grid by no later than 5pm on **5<sup>th</sup> August 2010**.
- 11.3 Please address all comments to the following e-mail address:  
[Cusc.Team@uk.ngrid.com](mailto:Cusc.Team@uk.ngrid.com)

## ANNEX 1 – AMENDMENT PROPOSAL FORM

<b>CUSC Amendment Proposal Form</b>	<b>CAP:187</b>
Title of Amendment Proposal:	
<b>Code Governance Review: Environmental Assessment and the Relevant Objectives</b>	
Description of the Proposed Amendment ( <i>mandatory by proposer</i> ):	
<p>This Amendment Proposal is part of a series of proposals raised by National Grid to implement the Final Proposals of the wider Code Governance Review which was initiated by Ofgem in November 2007. The review sought to address concerns that the existing code arrangements may be too complex and inaccessible to smaller market participants. Given the Authority's evolving role with the introduction of additional statutory duties and the right of appeal to the Competition Commission, such a review was considered to be conducted at an appropriate time.</p>	
<p>Ofgem published its Final Proposals for the Code Governance Review in March 2010, followed by its statutory consultation on licence modifications on 3<sup>rd</sup> June 2010. National Grid Electricity Transmission plc has not objected to the licence modifications. As part of the suite of work strands conducted by the Code Governance Review, it was proposed that the relevant code panels carry out an assessment of the impact on Greenhouse Gas Emissions as part of their deliberations on whether to recommend acceptance or rejection of a modification proposal.</p>	
<b>Background</b>	
<p>The introduction of the EU Emissions Trading Scheme (ETS), amongst other policy schemes, has meant that a market value can be placed on the cost of greenhouse gas emissions including carbon dioxide. In addition, the Government also issued guidance on valuing carbon which can be used to assess environmental costs and benefits. In June 2008, guidance was provided by the Authority specifying that the cost of greenhouse gas emissions should be taken into account when assessing code modification proposals. However, there was uncertainty surrounding the detail of this and it was not enforced as mandatory. Following a consultation period the guidance was revised which set out a 'dual pricing' approach to valuing carbon. It is now considered that it is possible to take account of environmental costs and benefits in the same way that the code panels and industry consider other economic costs and benefits when assessing a modification proposal against the relevant code objective governing efficient and economic network operation.</p>	
<b>Final Proposals</b>	
<p>The Final Proposals stipulate that an evaluation of the quantifiable impact of an Amendment Proposal on greenhouse gas emissions needs to be conducted when preparing and consulting on an Amendment Report, where the impact is likely to be material and in accordance with guidance issued by the Authority. Where relevant, this evaluation should be undertaken for both original and alternative solutions. When assessing an Amendment Proposal against the Applicable CUSC Objectives, if the Amendments Panel considers that an Amendment Proposal may have a material impact on greenhouse gas emissions, then the environmental costs and benefits associated with the emissions should be assessed,</p>	

using the latest guidance from Ofgem on the treatment of carbon costs and evaluation of the greenhouse gas emissions. At the time of drafting this Proposal, the latest version of this guidance was issued in March 2010 as Appendix 4 to the Code Governance Review Final Proposals document (ref: 43/10), and is attached as an appendix to this Amendment Proposal for reference. This could result in employing the relevant expertise to undertake such assessment, although we do not propose to make this an explicit requirement within the CUSC. Ofgem has since issued further guidance in July 2010 which is attached as an appendix to this document and it is this guidance that should be used when assessing a proposal.

**Description of Issue or Defect that Proposed Amendment seeks to Address (*mandatory by proposer*):**

This Amendment Proposal results from the licence modifications required to implement the Code Governance Review Final Proposals. National Grid Electricity Transmission plc has not objected to the licence modifications and therefore has an obligation to make the changes and additions to the CUSC where applicable.

**Impact on the CUSC (*this should be given where possible*):**

Section 8 of the CUSC will be amended to require Working Groups and the Amendments Panel to assess the quantifiable impact of an Amendment Proposal on greenhouse gas emissions, where applicable. The findings would subsequently be included in the Amendment Report and therefore an addition is required in Section 8 to include this provision.

Following feedback at a CUSC Panel meeting the Legal Text has been modified slightly to include further clarification. This version of the Legal Text has been added as Appendix 3 of this document.

The CUSC will also require an addition to incorporate the views of the Proposer on the CUSC Amendment Proposal Form as to whether they believe that their Proposal has a material impact on greenhouse gas emissions and, if so, what they believe that impact to be. National Grid also intends to update the proposal form itself, although this does not form part of the CUSC.

**Impact on Core Industry Documentation (*this should be given where possible*):**

None anticipated.

**Impact on Computer Systems and Processes used by CUSC Parties (*this should be given where possible*):**

None identified.

**Details of any Related Modifications to Other Industry Codes (*where known*):**

National Grid intends to raise similar proposals to both the BSC and the UNC, in line with the timetable which has been published to the industry in June 2010. These modification proposals will not interact with the changes proposed to the CUSC.

Justification for Proposed Amendment with Reference to Applicable CUSC Objectives\*\* (**mandatory by proposer**):

National Grid considers that implementation of this Amendment Proposal would better facilitate the following Applicable CUSC Objective:

**(a): "the efficient discharge by the licensee of the obligations imposed upon it under the Act and by this licence",**

This is a mandatory requirement under the new Licence Modifications and therefore justifies this Proposal.

<b>Details of Proposer:</b> Organisation's Name:	National Grid Electricity Transmission plc
Capacity in which the Amendment is being proposed:  (i.e. CUSC Party, BSC Party or "National Consumer Council")	CUSC Party
<b>Details of Proposer's Representative:</b> Name: Organisation: Telephone Number: Email Address:	Emma Clark National Grid Electricity Transmission plc 01926 655223 <a href="mailto:emma.clark@uk.ngrid.com">emma.clark@uk.ngrid.com</a>
<b>Details of Representative's Alternate:</b> Name: Organisation: Telephone Number: Email Address:	Alex Thomason National Grid Electricity Transmission plc 01926 656379 Alex.thomason@uk.ngrid.com
<b>Attachments: Yes</b>  Appendix 1 - Proposed Legal text Appendix 2 - Ofgem Guidance on the treatment of carbon costs under the current industry objectives, March 2010. Appendix 3 – Revised Legal text Appendix 4 Latest Ofgem Guidance July 2010.	

**Notes:**

1. Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.

2. The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.

The completed form should be returned to:

Steven Lam  
Commercial  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Or via e-mail to: [steven.lam@uk.ngrid.com](mailto:steven.lam@uk.ngrid.com)

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

3. Applicable CUSC Objectives\*\* - These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1. Reference should be made to this section when considering a proposed amendment.

## ANNEX 2 – REVISED PROPOSED LEGAL TEXT

The following amendments shall be made at Section 8 of CUSC:

At Paragraph 8.15.2 add the following as (g) and renumber accordingly

- (g) the reasoned opinion of the **Proposer** as to whether the **Proposed Amendment** would have a quantifiable effect on greenhouse gas emissions, where the impact is likely to be material, assessed in accordance with such current guidance on the treatment of carbon costs and evaluation of the greenhouse gas emissions as may be issued by the **Authority** from time to time;

Amend 8.20.2(d) as follows:

- (d) an analysis of whether (and, if so, to what extent) the **Proposed Amendment** would better facilitate achievement of the **Applicable CUSC Objective(s)**, including, where the impact is likely to be material, an assessment of the quantifiable impact of the **Proposed Amendment** on greenhouse gas emissions, to be conducted in accordance with such current guidance on the treatment of carbon costs and evaluation of the greenhouse gas emissions as may be issued by the **Authority** from time to time, and providing a detailed explanation of the **Amendments Panel's** reasons for that assessment;

Amend 8.20.2(e) as follows:

- (e) an analysis of whether (and, if so, to what extent) **any Working Group Alternative Amendment** would better facilitate achievement of the **Applicable CUSC Objective(s)** as compared with the **Proposed Amendment** and any other **Working Group Alternative Amendment** and the current version of the **CUSC**, including, where the impact is likely to be material, an assessment of the quantifiable impact of the **Working Group Alternative Amendment** on greenhouse gas emissions, to be conducted in accordance with such current guidance on the treatment of carbon costs and evaluation of the greenhouse gas emissions as may be issued by the **Authority** from time to time, and providing a detailed explanation of the **Amendments Panel's** reasons for that assessment;

## **ANNEX 3 – LATEST OFGEM GUIDANCE ON THE TREATMENT OF CARBON COSTS UNDER THE CURRENT INDUSTRY CODE OBJECTIVES.**

### **1. Introduction**

1.1 The clarification and guidance contained in this document relate to the following codes: the Balancing and Settlement Code, the Connection and Use of System Code, the Uniform Network Code, the Distribution Connection and Use of System Agreement, the System Operator Transmission Owner Code, the Uniform Network Code for Independent Gas Transporters, the Grid Code and the Distribution Code.

1.2 These codes govern many aspects of the electricity and gas markets arrangements. It is a feature of all of these codes that they are capable of being modified in accordance with industry led modification procedures. Under these modification procedures code panels and/or other industry parties need to assess proposed modifications against certain objectives. While the precise objectives vary from code to code, they all contain an objective relating, broadly, to the efficient and economic operation of the relevant network system.

1.3 This document sets out our position on the scope for considering carbon costs within the existing code governance framework. It also contains some guidance to code panels, administrators and industry participants as to how they could take account of this clarification in practice.

### **2. Relevant, recent developments**

2.1 The introduction of policy instruments such as the EU Emissions Trading Scheme (ETS) in 2005 has facilitated the emergence of a market value for carbon dioxide emissions in the sectors covered under the ETS. In addition, the Government has issued revised guidance on valuing greenhouse gas emissions<sup>1</sup>. The revised approach to carbon valuation in the non-traded sector is based on estimates of the abatement costs that need to be incurred to meet specific emissions reduction targets.

2.2 These developments mean that it is possible to place a quantifiable value on carbon dioxide and other greenhouse gas emissions and that this value can be used when assessing the impact on these emissions of proposed code modifications.

### **3. Significance of developments within existing code arrangements**

3.1 We consider that it is possible to take account of these environmental costs and benefits, in the same way that we (and the code panels and industry) would consider other economic costs and benefits, when assessing a modification proposal against the relevant code objective governing efficient and economic network operation.

3.2 In view of this, we would expect that such costs and benefits should be taken into account (where relevant) by the code panels and industry participants when assessing a modification proposal against the relevant code objective governing efficient and economic network operation.

3.3 In practical terms, therefore, we expect that industry and/or code panels (as appropriate) should take the following steps:

- (a) When assessing a modification proposal against the relevant code objective governing efficient and economic network operation, if the relevant industry

<sup>1</sup> The guidance, entitled 'Carbon Valuation in UK Policy Appraisal: A Revised Approach' (dated July 2009), has been issued by DECC and is available at: [http://www.decc.gov.uk/en/content/cms/what\\_we\\_do/lc\\_uk/valuation/valuation.aspx](http://www.decc.gov.uk/en/content/cms/what_we_do/lc_uk/valuation/valuation.aspx)

participant and/or code panel consider that the impact of a modification will or may be to reduce or increase greenhouse gas emissions (and that this impact is likely to be material) then, to the extent that this impact will or might affect their assessment of the modification against the code objectives, the quantifiable environmental costs and benefits associated with the greenhouse gas emissions should be assessed (using the methods described in paragraph 3.4). The likely level of impact (materiality) will no doubt influence how the industry participant and/or the code panel go about this assessment. They may, for example, consider it appropriate to make enquiries of the relevant network operator. In addition, or alternatively, the relevant industry participant and/or code panel may decide it would be appropriate to employ the relevant expertise to undertake such assessment.

b) Where they have evaluated the environmental costs and benefits of greenhouse gas emissions, the relevant industry participant and/or code panel should use the results of this analysis to inform its assessment of the relevant modification against the efficient and economic network operation objective of the relevant industry codes.

3.4 Where an industry participant and/or code panel undertake an assessment of greenhouse gas emissions, the relevant industry participant and/or code panel undertaking the analysis should, where that assessment is of a level that would warrant it:

(a) quantify the impact on carbon dioxide and/or other greenhouse gas emissions in terms of tonnes of carbon dioxide using the updated guidance provided by DECC<sup>2</sup>. This guidance includes traded and non-traded prices for carbon for each year up to 2100 for the purpose of policy appraisal. The guidance also includes greenhouse gas global warming potentials which can be used to convert emissions of other greenhouse gases into tonnes of carbon dioxide equivalent in order to value these emissions using a 'non-traded price of carbon'<sup>3</sup>. Emissions of other greenhouse gases should, where relevant, include any effects on methane leakage from the gas transmission and distribution systems and sulphur hexafluoride leakage from electricity transmission and distribution;

(b) develop a range of cost scenarios for changes (increases or decreases) in emissions in sectors covered by the EU ETS generally valued at the 'traded price of carbon' and changes in emissions for sectors not covered by the EU ETS generally valued at a 'non-traded price of carbon'. We recognise that going forward, other mechanisms to measure the market value of greenhouse gases may be developed and this clarification and guidance should not be interpreted as precluding the use of any such mechanisms. Any assessment should therefore clearly state the source of values used. If the assessment uses values which differ from the prevailing DECC guidance, these should be robust and justifiable in the context of the analysis; and

(c) include scenarios using both a social discount rate and a commercial discount rate. In calculating the social discount rate, the relevant industry code participant and/or code panels should have regard to the guidance in the Treasury Green Book<sup>4</sup>

<sup>2</sup> Carbon values are expected to be updated every year. The latest carbon values can be found in 'Updated short term traded carbon values for UK public policy appraisal (June 2010)' at:

[www.decc.gov.uk/assets/decc/what%20we%20do/a%20low%20carbon%20uk/carbon%20valuation/1\\_20100610131858\\_e\\_@@\\_carbonvalues.pdf](http://www.decc.gov.uk/assets/decc/what%20we%20do/a%20low%20carbon%20uk/carbon%20valuation/1_20100610131858_e_@@_carbonvalues.pdf) <sup>3</sup> The DECC guidance (see footnote 1) provides details regarding conversion.  
<sup>4</sup> [http://www.hm-treasury.gov.uk/data\\_greenbook\\_index.htm](http://www.hm-treasury.gov.uk/data_greenbook_index.htm)

#### **ANNEX 4 – PROPOSED TIMETABLE FOR INDUSTRY CONSULTATION**

9 <sup>th</sup> July 2010	Special Amendments Panel meeting – agree whether to proceed to consultation
14 <sup>th</sup> July 2010	Publish industry consultation papers (for 3 weeks)
5 <sup>th</sup> August 2010	Consultation closes
11 <sup>th</sup> August 2010	Draft Amendment Reports published for industry comment
18 <sup>th</sup> August 2010	Deadline for industry comment
19 <sup>th</sup> August 2010	Draft Amendment Report published prior to Panel Recommendation Vote (with Panel papers)
27 <sup>th</sup> August 2010	Amendments Panel meeting – Panel Recommendation Vote
31 <sup>st</sup> August 2010	Send final Amendments Report to Authority
5 <sup>th</sup> October 2010	Indicative Authority decision date (25 Working Day KPI)
19 <sup>th</sup> October 2010	Indicative implementation date (10 Working Days after Authority decision)