## Code Administrator Consultation

# CMP384:

# Apply adjustments for inflation to manifest error thresholds using Indexation

**Overview:** To ensure that fixed manifest error thresholds stated within the CUSC account for inflation and are better aligned with current TNUoS tariffs to which they relate.

**Modification process & timetable**

1. **Proposal Form**
   08 February 2022
2. **Workgroup Consultation**
   17 June 2022 – 08 July 2022
3. **Workgroup Report**
   18 August 2022
4. **Code Administrator Consultation**
   30 August 2022 - 21 September 2022
5. **Draft Modification Report**
   22 September 2022
6. **Final Modification Report**
   12 October 2022
7. **Implementation**
   01 April 2023

**Have 5 minutes?** Read our Executive summary

**Have 20 minutes?** Read the full Code Administrator Consultation

**Have 40 minutes?** Read the full Code Administrator Consultation and Annexes.

**Status summary:** The Workgroup have finalised the proposer's solution. We are now consulting on this proposed change.

**This modification is expected to have a:**
**High impact** on All Users liable for Zonal TNUoS Charges
**Low impact** on National Grid ESO

| | | |
|---|---|---|
| **Governance route** | This modification has been assessed by a Workgroup and Ofgem will make the decision on whether it should be implemented. | |
| **Who can I talk to about the change?** | **Proposer:** Ryan Ward, Scottish Power Renewables ryan.ward@scottishpower.com<br><br>Phone: 0141 614 0000 | **Code Administrator Chair**: Ren Walker Lurrentia.walker@nationalgrideso.com<br><br>Phone: 07976 940 855 |
| **How do I respond?** | Send your response proforma to cusc.team@nationalgrideso.com **by 5pm on 21 September 2022.** | |

# Contents

# Executive summary

This modification will ensure that fixed manifest error thresholds stated within Section 14 of the CUSC account for inflation and are better aligned with current TNUoS tariffs to which they relate.

## What is the issue?

The CUSC Section 14.17.34 contains fixed manifest error thresholds which were set and codified at appropriate levels at the time of consideration in October 2006 but have not been subject to inflation since.

## What is the solution and when will it come into effect?

**Proposer's solution:**

Applying RPI to the manifest error thresholds covered in CUSC Sections 14.17.34 until 31st of March 2021, to reflect a revised threshold value in 2020/21 real terms. Then indexing it to the Transmission Owner Price Index (TOPI) thereafter.

**Implementation date:**
1st April 2023.

**Summary of potential alternative solution(s) and implementation date(s):**

No alternatives have been raised by the Workgroup. However, the Workgroup did hold discussions on some other possible solutions. Which included:

- Different solutions for Generators v Suppliers;
- Different solutions for Local v Wider elements of the charge;
- Smearing the charges across Users;
- Different thresholds and timings for a Credit v Charge;
- Linking thresholds to a percentage of the Users annual TNUoS bill and
- Linking thresholds to Maximum Allowed Revenue (MAR)
- Retrospectivity to the 2021/22 charging year

**Workgroup conclusions:** The Workgroup unanimously concluded that the Original, better facilitated the Applicable CUSC Objectives than the Baseline.

## What is the impact if this change is made?

It will ensure that the manifest error thresholds move in line with inflation. So that they remain proportionate, relevant and reduce the possibility of an over/under recovery impacting Users directly liable for Zonal TNUoS Charges, late in the process.

## Interactions

This modification has no interactions with any other modifications, codes/standards, or other industry-wide work.

This modification has no interactions with Electricity Balancing Regulation (EBR) Article 18 Terms and Conditions.

## What is the issue?

The CUSC Section 14.17.34 contains fixed manifest error[1] thresholds which were set and codified at appropriate levels at the time of consideration in October 2006, but which have not been subject to inflation since.

## Why change?

The manifest error thresholds contained in the CUSC are fixed and were set after a decision on GB ECM-05[2] charging modification. Prior to 2006, there had been no accounting for manifest errors. The subject of GB ECM-05 was the impact on Users being overcharged. A threshold was set that was an appropriate and proportionate level of materiality and User uncertainty was limited by restricting any changes to manifest errors found within the charging year. Thresholds should be set to balance the effect that over/under-recovery adjustments to TNUoS, caused by manifest errors, have on Users. If set too low, Users could be significantly impacted in a way that they are unable to incorporate into prices. This is especially true if the error is found late in the charging year. When the error thresholds were set 16 years ago, the TNUoS revenue was much lower than £3.5bn[3] which is where the 2022/23 TNUoS revenue currently stands. The Proposer considers it appropriate to update these thresholds.

At TCMF of 4th February[4], ESO tabled that, by using the current CUSC thresholds (section 14.17.34), three Generator Users will be impacted. According to the information provided by ESO, the individual impact to each User is at least ±£250k. In line with CUSC section 14.17.32 the values will be invoiced in April 2022 to be paid in May 2022. The Proposer considers it appropriate to update the thresholds to ensure the balance of impacts on Users remains and that Users in this charging year and going forward are not disproportionately affected.

## What is the solution?

## Proposer's solution

Apply an indexation approach to the manifest error thresholds (covered in sections 14.17.32 – 14.17.35). In simple terms, applying RPI until 31st of March 2021 and then the Transmission Owner Price Index (TOPI)[5] thereafter.[6]

[1] An 'error' is defined when an input into the TNUoS charging model has been incorrectly applied. When the error breaches the specified criteria currently set out within the CUSC it is termed as a Manifest Error. This modification seeks to adjust the threshold of when a Manifest Error applies to better reflect relative cost charged by NGESO. Currently the value at which a Manifest Error is triggered is fixed.
[2] Decision in relation to use of system charging methodology modification proposal GB ECM-05: Manifest data errors in the calculation of TNUoS | Ofgem.
[3] See Table 15 of draft 2022/23 tariff publications https://www.nationalgrideso.com/document/223556/download.
[4] https://www.nationalgrideso.com/document/235651/download.
[5] TOPI is defined as the price index adjustment method as described in Part F of Special Condition 2.15 of the Relevant Transmission Licensee's Transmission Licence (TOPI makes use of CPIH (the Consumer Prices Index Including Owner Occupiers' Housing Costs)).
[6] Note that CMP356 (CMP355 & CMP356 'Updating the Indexation methodology used in TNUoS and Transmission Connection Asset charges for RIIO2 (CMP355) & Definition changes for CMP355 (CMP356)' | National Grid ESO) was previously raised to support CMP355 by adding the definition of Transmission Owner Price Index (TOPI) to Section 11 of the CUSC.

The Proposer decided to amend his original solution so that it no longer applied retrospectively to the 2021/22 charging year but wanted to know if this could be implemented 10 working days after an Authority decision. The National Grid ESO internal legal team advised that as this is a Section 14 change, and it does not fall under any of the category of provisions within the CUSC which would allow a mid-year implementation it would need to be implemented on the 1st April. Based on this information, the Proposer confirmed that it would now be implemented and take effect from the 1st April 2023, the beginning of the next charging year.

## Workgroup considerations

The Workgroup convened 5 times to discuss the perceived issue, detail the scope of the proposed defect, devise potential solutions and assess the proposal in terms of the Applicable Code Objectives.

### Consideration of the proposer's solution

**How current manifest error thresholds were derived**

The Workgroup explored the background behind GB ECM-05, why it was raised and how current manifest error thresholds were derived. As well as the materiality of the thresholds and impacts on generators. Further information on this can be found in Annex 5c.

**What constitutes an "error"**

The Workgroup felt that there were ultimately two broad categories of error. Human error, where the incorrect data is input into the model or a more fundamental forecasting error.

The Proposer explained that a manifest error is currently defined in CUSC Section 14.17.33 as one of the following:

a) An error in the transfer of relevant data between the transmission licensees or distribution network operators
b) An error in the population of the transport model with relevant data
c) An error in the function of the transport model
d) An error in the population of the inputs, or function of the tariff model.

The Workgroup reviewed these four definitions of manifest error and applied it to a number of areas where one could occur (please see table below). The Workgroup members were satisfied that the four categories could be applied to each of the instances they could think of. Fundamentally it was the magnitude of the error and reviewing the materiality of the thresholds that was more important (and considered as the defect), rather than the area in which one occurred or the definition of what constituted an error.

Based on these findings the Workgroup agreed that Term of Reference (f) "Consider what constitutes as an error" was no longer relevant and no further work needed to be done on this.

| **Inputs into the Transport Model** |
|---|
| |
| **Transmission Entry Capacity (TEC)** |
| TEC used in the model differs to the TEC declared |

| |
|---|
| Formula errors in the model |
| |
| **Circuit** |
| Circuits do not match the nominated source of information (as at 2022 source is Electricity Ten Year Statement) |
| Source information is incorrect, but Model reflects accurate view |
| |
| **Nodal Demand** |
| Demand input does not match the nominated source of information (as at 2022 source is wk24 data supplied by the Distribution companies) |
| Source information is incorrect, but Model reflects accurate view |
| |
| **Expansion Constant/Factors** |
| Input error into the Model |
| Methodology not followed accurately leading to incorrect inputs |
| |

| |
|---|
| **Inputs in the Tariff Model** |
| |
| **Revenues** |
| Revenue values entered into the Model incorrectly |
| Demand forecast has been inputted incorrectly |
| |
| **Calculation of Generation/Demand Split** |
| Input error into the Model |
| Inputs calculated incorrectly |

**Number of manifest errors since GB ECM-05 was introduced**

The Workgroup established that:

- Under the current manifest error thresholds, since 2013 no other incidences of manifest error were identified, besides the three Users impacted in 2021/22.
- Looking at a larger range of £150k to £350k, within the last five years seven manifest errors were identified. These were all for generation customer charges for 2021/22 TNUoS tariffs. Of those seven, only three Generator Users were impacted because of current manifest error thresholds.
- Under the revised thresholds proposed by CMP384, only 1 out of those 3 Users would have been impacted in 2021/22.

The Workgroup concluded that manifest errors were rare. But when they did occur, they could be quite large errors and effect multiple Users.

**Disproportionate impacts on different parties**

A Workgroup member questioned whether a monetary threshold was still relevant for the current market, given that the number of players had increased and there were a lot more smaller players coming in. Even if this is linked to RPI/TOPI.

The Proposer felt that the threshold increase would provide an additional £120,000 buffer for small Generators. The Workgroup highlighted that this was only the case in the event of a windfall loss rather than a gain, and that some Users may want to see thresholds decreased, this needed to be fair in both senses.

The Workgroup went on to discuss whether they needed different solutions for Generators and Suppliers. As an error is locational and could affect an individual Generator a lot more than a Supplier who is normally GB based, who would be charged the wider tariff and not the local circuit/substation charge.

The Proposer highlighted that in GB ECM-05, Ofgem's view was that no classes of Users were discriminated against. Therefore, the proposer did not feel an over complicated solution was needed here.

**Consideration of other options**

**Alternative approaches discussed**

The Workgroup discussed several possible alternate approaches (listed below), but decided against raising any Workgroup alternatives. This is because the Workgroup concluded that indexation was the most pragmatic approach to take. It is broadly in line with what is currently going on in the other areas of the CUSC, and provides a clear, simple, easy to understand solution.

The possible alternative approaches discussed were:

**Local v Wider elements of the charge**

One view within the Workgroup was that the solution worked very well for an error which affected an individual Users local element of the charge. But the threshold seemed arbitrary when it came to errors that affected wider elements of the charge that no one can currently benefit from. They felt this was un-competitive, and a potential solution for consideration could be that if the error affects wider elements of the charge, all Users would be subjected to a reconciliation. However, if it just affects the individual locational element then just that individual User is reconciled.

**Different solutions for Generators v Suppliers**

A Workgroup member questioned whether they needed different solutions for Generators and Suppliers. As an error is locational and would affect an individual Generator a lot more than a Supplier who is normally GB based who would be charged the wider tariff and not the local circuit/substation charge.

**Smearing the charges across Users**

Another view discussed by the Workgroup was whether individual Users should have to pick up the cost of a manifest error charge at all. Or whether the threshold should be removed, and the charge should just be smeared across all Users instead. This is how it currently works if the threshold is not met. The charge is rolled into year +2 under/over

recovery (K), which means it is not felt by Users as it is incorporated within the forecasts and allows Users to budget for this.

The Workgroup went onto discuss whether it was more appropriate, to see a windfall gain/loss or to be able to incorporate this into their budgets based on forecast tariffs. Workgroup members highlighted that Users who receive a manifest error charge cannot reflect these in forward commercial terms, as doing so would make them appear less competitive.

**Different thresholds and timings for a Credit v Charge**

Workgroup members discussed whether they should have different thresholds for a manifest error that has caused a credit versus a charge, as well as timings on when this is paid back. This is because these errors tend to generally appear towards the end of the charging year when tariffs are being set for the following year. Which means Users are less able to pass them onto their customers.

Could the reconciliation instead be applied in the following charging year or within the K factor (adjustment mechanism). This would give Users the opportunity to set their tariffs to recover this difference, so it is not seen as an unexpected loss or profit. Some Workgroup members felt that the current status quo was too heavily weighted towards being able to recover rather than on an un-expected loss caused by someone else's error. They felt there was enough rationale and justification for different approaches.

Another view within the Workgroup was that this could be hard to justify and for consistency it may be more reasonable to keep them the same.

**Linking thresholds to a percentage of the Users annual TNUoS bill**

Another possible alternative discussed by a Workgroup member was whether the threshold should be changed to a percentage of the User's annual TNUoS bill. The Proposer highlighted that there were variations in TNUoS tariffs north and south of the Scottish border, which could be a stumbling block to this approach. This may mean larger TNUoS bill payers would be less likely to face a reconciliation, whilst smaller players would be more sensitive to the materiality threshold. The Workgroup highlighted that in GB ECM-05, CUSC Section 14.17.34 (b)[7] had been added to make sure larger generators were captured. An alternative based on the percentage of a TNUoS charge may neglect this fact.

**Linking thresholds to Maximum Allowed Revenue (MAR)**

Another view within the Workgroup was that the threshold could be linked to the MAR rather than inflation. As the average TNUoS charge paid by Users is probably higher than

[7] CUSC Section 14.17.34
– A manifest error shall be considered material in the event that such an error or, the net effect of multiple errors, has an impact of the lesser of either:
a) an error in a User's TNUoS tariff of at least +/-£0.50/kW; or
b) an error in a User's TNUoS tariff which results in an error in the annual TNUoS charge of a User in excess of +/-£250,000

the threshold of any inflation index. This may not be an easy solution, but it would keep Users tariffs and what they are charged in line with the threshold.

**Retrospectivity to the 2021/22 charging year**

The Proposer suggested raising an alternative that would apply retrospectively to the 2021/22 charging year. However, there was no real support for this approach to be taken within the Workgroup. One view was that the modification should be forward looking, and previous years errors should be governed by the rules that were in place at the time. Another view was that this would be very difficult to achieve because revenues had already been distributed to the TO's and there would be issues around Reconciliation Final (RF) reads versus Initial Settlement Run (SF) reads if they tried to get this money back.

## Workgroup consultation summary

The Workgroup held their Workgroup Consultation between 17 June 2022 – 08 July 2022 and received 4 non - confidential responses. The full responses along with a summary of the responses can be found in Annexes 6 and 7.

The Workgroup met to discuss and consider all the responses received and noted the following trends and key points within the industry's responses:

- No alternatives were raised
- Respondents believed that CMP384 Original proposal better facilitates applicable objectives (a), (b), (c) and (e)
- The majority of respondents supported the implementation approach for CMP384. One respondent noted that their preference would have been for CMP384 to be effective from this charging year.
- All respondents supported the new manifest error thresholds and the effect they will have on Users being just below/above the threshold, outlining the following reasons:
    - Sensible to set new thresholds using an established and transparent methodology.
    - Will result in fewer instances of a reconciliation which is a positive outcome for Users.
- All respondents agreed there should not be a different threshold and or timings for reconciliation of a credit v charge. Noting the following:
    - This could raise further and more complicated processes to reconcile the funds between these parties, particularly for NGESO.
    - For consistency and fairness, credits & charges should be set at the same threshold and be collected / paid in the same timeframe.
    - A mechanism to allow an expedited reconciliation is fairer over different cost recovery scenarios that are socialised amongst a wider group.
- There is no pre/warning or alert system in place to make Users aware that a manifest error has been identified or how close they are to hitting the threshold. Workgroup members agreed that a reporting system was needed to give Users early visibility of the cumulative effect of any errors that are identified within that charging year. This will then allow them to better manage any risks of receiving a future bill. Workgroup Members did not feel that this needed to be codified within

the CUSC; but could be something as simple as NGESO providing quarterly updates at the Transmission Charging Methodologies Forum (TCMF). Which could include the number of errors identified and how close Users were in percentage terms from hitting the threshold. The ESO, in principle agreed to provide a periodic update to industry.

## Legal text

CUSC Section 14.17.34 will be amended to reflect a revised threshold value in 2020/21 real terms and to state going forward that it will be indexed by TOPI.

The legal text for this change can be found below, and is also available in Annex 8:

14.17.34 A manifest error shall be considered material in the event that such an error or, the net effect of multiple errors, has an impact of the lesser of either:

a) an error in a User's TNUoS tariff of at least ~~±/-£0.50/kW~~ +/-£0.76/kW; or

b) an error in a User's TNUoS tariff which results in an error in the annual TNUoS charge of a User in excess of ~~±/-£250,000~~ +/-£377,735.

*Thresholds are stated in 2020/21 money and will be indexed annually by the Transmission Owner Price Index (TOPI) thereafter, starting from the 1st April 2021.*

## What is the impact of this change?

| Proposer's assessment against CUSC Charging Objectives | |
|---|---|
| **Relevant Objective** | **Identified impact** |
| (a) That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity; | **Positive**<br>The proposal will ensure that the manifest error thresholds are increased in line with inflation so that they remain relevant and reduce the possibility of an over/under recovery impacting Users directly which creates an unlevel playing field. |
| (b) That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection); | **Positive**<br>The proposal will ensure that pass-through from manifest error is proportionate since it will index the threshold commensurate with TO price control volume indexation. |
| (c) That, so far as is consistent with sub-paragraphs (a) and (b), the use of system | **Positive** |

| | |
|---|---|
| charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees' transmission businesses; | The proposal will ensure that pass through of manifest errors is proportionate since the value set in 2006 would now be indexed with inflation. |
| (d) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and | **Neutral** |
| (e) Promoting efficiency in the implementation and administration of the system charging methodology. | **Positive**<br>The proposal will reduce ad hoc unexpected and inaccurately appropriated charges, late in the process. |
| *The Electricity Regulation referred to in objective (d) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006. | |

## Workgroup vote

The Workgroup met on 10 August 2022 to carry out their workgroup vote. The full Workgroup vote can be found in Annex 9. The table below provides a summary of the Workgroup members view on the best option to implement this change.

The Applicable CUSC (charging) Objectives are:

**CUSC charging objectives**

a) That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;
b) That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);
c) That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees' transmission businesses;
d) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and
e) To promote efficiency in the implementation and administration of the system charging methodology

*The Electricity Regulation referred to in objective (d) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity

(recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

The Workgroup concluded unanimously that the Original better facilitated the Applicable Objectives than the Baseline.

| Option | Number of voters that voted this option as better than the Baseline |
|---|---|
| Original | **6** |

**Best Option**

| Workgroup Member | Company | BEST Option? | Which objective(s) does the change better facilitate? (if baseline not applicable) |
|---|---|---|---|
| Ryan Ward | **Scottish Power** | **Original** | **(a), (b), (c) & (e)** |
| Ken Doyle | **National Grid ESO** | **Original** | **(a), (b), (c) & (e)** |
| Binoy Dharsi | **EDF Energy** | **Original** | **(a), (b), (c) & (e)** |
| Damian Clough | **SSE Generation Ltd** | **Original** | **(a), (b), (c) & (e)** |
| Alan Currie | **Ventient Energy** | **Original** | **(a), (b), (c) & (e)** |
| Claire Hynes | **RWE** | **Original** | **(a), (b), (c) & (e)** |

## When will this change take place?

**Implementation date**
This proposal will be implemented and take effect from the 1st April 2023.

**Date decision required by**
By 31 January 2023.

**Implementation approach**
No process or system changes are required.

## Interactions

| | | | |
|---|---|---|---|
| ☐Grid Code | ☐BSC | ☐STC | ☐SQSS |
| ☐European Network Codes | ☐ EBR Article 18 T&Cs[8] | ☐Other modifications | ☐Other |

No further interactions identified.

[8] If the modification has an impact on Article 18 T&Cs, it will need to follow the process set out in Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195) – the main aspect of this is that the modification will need to be consulted on for 1 month in the Code Administrator Consultation phase. N.B. This will also satisfy the requirements of the NCER process.

## How to respond

### Code Administrator consultation questions

- Do you believe that CMP384 Original proposal better facilitates the Applicable Objectives?
- Do you support the proposed implementation approach?
- Do you have any other comments?

Views are invited on the proposals outlined in this consultation, which should be received **by 5pm on 21 September 2022**.

Please send your response to cusc.team@nationalgrideso.com using the response pro-forma which can be found on the CMP384 modification page.

*If you wish to submit a confidential response, mark the relevant box on your consultation proforma. Confidential responses will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

## Acronyms, key terms and reference material

| Acronym / key term | Meaning |
|---|---|
| BSC | Balancing and Settlement Code |
| CMP | CUSC Modification Proposal |
| CPIH | Consumer Prices Index including Owner Occupiers' Housing Costs (UK) |
| CUSC | Connection and Use of System Code |
| EBR | Electricity Balancing Regulation |
| ESO | Electricity System Operator |
| GEMA | Gas and Electricity Markets Authority |
| NGESO | National Grid Electricity System Operator |
| RPI | Retail Price Index |
| STC | System Operator Transmission Owner Code |
| SQSS | Security and Quality of Supply Standards |
| T&Cs | Terms and Conditions |
| TCMF | Transmission Charging Methodologies Forum |
| TNUoS | Transmission Network Use of System |
| TOPI | Transmission Operator Price Index |

**Reference material**

- Decision in relation to use of system charging methodology modification proposal GB ECM-05: Manifest data errors in the calculation of TNUoS | Ofgem https://www.ofgem.gov.uk/publications/decision-relation-use-system-charging-methodology-modification-proposal-gb-ecm-05-manifest-data-errors-calculation-tnuos
- Table 15 of draft 2022/23 tariff publications https://www.nationalgrideso.com/document/223556/download)

- TCMF presentation
  https://www.nationalgrideso.com/document/235651/download
- CMP355&356
  CMP355 & CMP356 'Updating the Indexation methodology used in TNUoS and Transmission Connection Asset charges for RIIO2 (CMP355) & Definition changes for CMP355 (CMP356)' | National Grid ESO

## Annexes

| Annex | Information |
|---|---|
| Annex 1 | Proposal form |
| Annex 2 | Terms of reference |
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| Annex 4 | Proposers Presentation – Workgroup meeting 1 |
| Annex 5 | 5a - GB ECM-05 Conclusions Report<br>5b - GB ECM-05 Ofgem decision letter<br>5c – Background on why GB ECM-05 was raised, what constitutes as a 'manifest error' and materiality of threshold. |
| Annex 6 | Workgroup Consultation Responses |
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