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# Performance Assurance Document for the (Gas) Energy Settlement Performance Assurance Scheme

Spring 2020

Version 3.0

Prepared and maintained by the Uniform Network Code Committee or any relevant Sub-committee.

This document does not include any confidential, personal or sensitive information.

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CHANGE HISTORY

Version	Status	Issue Date	Author	Comments
1.0		May 2016		From UNC 0506V – as approved
2.0		March 2017		Updated to reflect committee views of how the framework will work in practice. Approved at March UNCC meeting

DOCUMENT CONTROLS

Reviewer	Role	Responsibility	Date

## Acronyms and Definitions

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### ACRONYMS USED IN THIS DOCUMENT

PAC	Performance Assurance Committee
PAFA	Performance Assurance Framework Administrator
PAF	Performance Assurance Framework (known formally as the Performance Assurance Scheme)
CDSP	Central Data Services Provider

### DEFINITIONS

The following terms shall have the following meanings:

**‘Change’**

means a proposal for the addition to, variation of, or removal of any of the services within the Performance Assurance Framework Administrator Scope

**‘Confidential Information’**

means all information provided to PAC unless otherwise stated

**‘Employer Assurance Document’**

means a document signed by an Office Bearer of the employer of the Performance Assurance Committee (PAC) Member assuring that the PAC Member can attend PAC meetings and that they are attending and voting at PAC meetings in the interest of the GB gas market and that they will not be representing any commercial interest or commercial body

**‘Energy Settlement’**

means the allocation and reconciliation of energy at supply point level

**‘Performance Assurance Committee Member - Confidentiality Agreement’**

means a document signed by the Performance Assurance Committee Member assuring that they are attending and voting at Performance Assurance Committee meetings in the interest of the GB gas market and that they will not be representing the commercial interest of any commercial body and that they will not divulge confidential matters nor confidential information.

**‘Performance Assurance Committee Document’**

means the series of documents detailed in Section 8 of this Framework Document, prepared and maintained to support the general operation of the Performance Assurance Scheme. These documents are governed by the Performance Assurance Committee

**‘Performance Assurance Framework’**

has the same meaning as ‘Performance Assurance Scheme’ as described in the legal text for UNC Modification 0506V;

**‘Performance Assurance Framework (PAF) Year’**

means the year commencing on 01 October each year

**‘Performance Assurance Framework Administrator Scope’**

means the scope of works set by the Performance Assurance Committee and agreed with the Performance Assurance Framework Administrator (PAFA) as set out in Document 4

**‘Performance Assurance Scheme Party’**

means the scheme party referred to or described in Section 3.4

**‘Performance Report(s)’**

means a report or reports defined in the Performance Report Register

**‘Performance Report Register’**

means the register of agreed reports defined in Document 1

**‘Report Specification’**

means the report specification defined in Document 2

**‘Risk Register’**

means the register of risks defined in Document 3

# Performance Assurance Framework

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To be inserted



# PAC Appointments and Requirements

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## .1.0 Definitions

Tbc

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## 2.0 Introduction

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## 3.0 Composition of PAC Membership

3.1 The PAC will be made up of members who together provide expertise across gas Settlement, including experience within the different types of organisation that are assured under the PAC.

3.2 Its membership shall encompass different roles within gas Settlement and different categories of business within each role.

3.3 The PAC comprises of a Shipper and Transporter constituency. The Shipper constituency comprises of 9 Shipper User Members, all of who have voting rights (as determined by the annual User Representative process) and the Transporter constituency comprises of 3 Transporter-appointed Members (comprising 2 large distribution Transporters and 1 AIGT nominee), all of whom have voting rights.

3.4 NTS will not have membership rights.

3.5 Ofgem will have the right to provide a PAC representative, at their own discretion, who will be in an advisory capacity only. Ofgem shall advise the Joint Office of their nominated representative on an annual basis or less frequently in the event of no change to the representative. For the avoidance of doubt, the Ofgem representative is not a PAC Member.

## 4.0 Performance Assurance Committee Structure

4.1 For PAC to fulfil its role under the PAF, its membership must behave in a manner that is consistent with the principles of the PAF and the duties of the PAC.

4.2 Shipper-elected PAC Members are elected annually for appointment on the 1st October and any at other times when vacancies occur. These elections will be conducted by the Designated Person.

4.3 The period of appointment for PAC members will be [three] years. This will result in a greater degree of some continuity of committee members. The process is described and will be conducted according to the Guidelines for the User Representatives Appointment Process.

4.4 PAC Members are representatives in their own right and do not represent the company by which they are employed.

4.5 The Designated Person election rules permit no more than one Shipper User PAC Member per company and it will be for the nominating Party to consider the suitability of their nominee, in respect of experience and understanding of the issues that the PAC will deal with.

4.6 All PAC Members and their alternates will be required to sign a Confidentiality Assurance Document and their employer shall also be required to sign an Employer Assurance Document to assure that the Member will be attending and voting at the PAC in the interests of the GB gas industry and not representing any commercial interest or commercial body or interest group.

4.7 A list of all PAC Members, ~~and~~ standing alternates ~~for Transporter members and the pool of alternates for Shipper User members~~ is published on the Joint Office website.

4.8 A PAC Member may appoint an alternate ~~either~~ on a standing basis ~~or on a meeting by meeting basis~~. ~~Shipper User members may select their alternate from a pool of [5] Shipper User alternates. Shipper User pool alternates are elected annually for appointment on the 1st October and at other times when vacancies occur. These elections will be conducted by the Designated Person. Shipper User alternates may be appointed on a meeting by meeting basis.~~ Such appointments shall be made in writing or by email to [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk). Alternates need not necessarily come from the same company as the PAC Member. It will be for the PAC Member to consider the suitability of their alternate, in respect of experience and understanding of the issues that the PAC will deal with. ~~No members serving on a PAC on any date may be employed by the same company.~~ A single alternate may ~~not~~ represent more than one (1) PAC Member ~~, unless a quorum cannot be achieved without this happening.-~~

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## 5.0 Member Impartiality

5.1 PAC Members are appointed and they are:

- To provide support to the PAC in assuring gas Settlement.
- Expected to exercise their duties in an impartial and independent manner.
- Not representatives of their organisations or of their organisation's interests while sitting on PAC.

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## 6.0 Appointment ProcessMember Impartiality

- ~~[Lift and shift from proposal to UNCC or reference the 'Guidelines for the User Representatives Appointment Process?']~~

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## 7.0 Declarations of interest in PAC business

7.1 ~~PAC members are required to declare matters in which they have an interest such as:~~~~What is a matter in which a PAC member has an interest?~~

- PAC business which concerns a member's employer, an affiliate of their employer or a trade body with which the member or its employer are affiliated.

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7.2 ~~PAC members are required in such circumstances to:~~~~What is required of a PAC member when they have an interest in PAC business?~~

- Declare their interest to the PAC and PAFA as soon as they become aware of it
- ~~Do not~~ participate in decision-making concerning the interest
- ~~Do not~~ receive PAC information relevant to the interest

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## 8.0 Non-Disclosure of PAC business

8.1 PAC members will treat all PAC business as confidential unless PAC, having regards to its mission and objectives as defined in ~~[reference]~~ the Framework Objectives determines to treat a piece of business as non-confidential.

8.2 The duty of PAC members to not disclose confidential PAC business endures beyond the PAC member's appointment term.

8.3 PAC members will be required to sign a non-disclosure agreement to this effect.

## 9.0 Consequences of not declaring an interest or of disclosure of business

9.1 This is a material breach of the member's obligations toward the PAC.

9.2 If the PAC or the PAFA becomes aware of a possible breach of a member's obligations, it shall refer the matter to the UNCC, along with all relevant evidence, including, but not limited to, information on the materiality of the breach, its wilfulness and any other breaches that have occurred or that it believes to have occurred.

9.3 The UNCC shall, having regard to the circumstances, including the materiality of the breach, its wilfulness, and any other breaches of which it is aware, determine an appropriate action, including, but not limited to:

- ~~A~~ written warning to both the member and their organisation, setting out the breach and reminding both of member obligations to the PAC
- Removal from the PAC
- Referral to the Authority

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## PAC Terms of Reference

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### 1.0 Introduction

The Uniform Network Code Committee (UNCC) agreed these terms of reference for the Performance Assurance Committee (PAC) on **17 May 2018** and amendments shall only be made with the consent of the UNCC.

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### 2.0 Scope of the PAC

#### 2.1 General

The PAC is defined as a sub-committee of the Uniform Network Code Committee, with certain rights and responsibilities relating to the management of the community's Performance Assurance Framework (PAF).

The PAC is chaired by the Joint Office and is attended by PAC Members and an Ofgem representative. From time to time, the PAC may invite other individuals to attend, in a non-voting capacity. In respect of any such individual, the PAC may, from time to time, determine that such individual be excluded for all or part of the meeting of the PAC. Ofgem shall be entitled to send a nominated representative to the meeting, who (for the avoidance of doubt) will attend in a non-voting capacity and shall be not be excluded from any part of the meeting.

The PAC and any Performance Assurance Framework is limited to energy and supply points within local distribution zones, it does not extend to energy transported through the National Transmission System and supply meter points connected to it.

#### ~~2.2 Performance Assurance Committee Structure~~

~~Effective from 01 June 2018, the PAC comprises of a Shipper and Transporter constituency. The Shipper constituency comprises of 9 Shipper User Members, all of who have voting rights (as determined by the annual User Representative process) and the Transporter constituency comprises of 3 Transporter appointed Members (comprising 2 large distribution Transporters and 1 AIGT nominee), all of whom have voting rights. NTS will not have membership rights.~~

~~Ofgem will have the right to provide a PAC representative, at their own discretion, who will be in an advisory capacity only. Ofgem shall advise the Joint Office of their nominated representative on an annual basis or less frequently in the event of no change to the representative. For the avoidance of doubt, the Ofgem representative is not a PAC Member.~~

~~Shipper elected PAC Members are elected annually for appointment on the 1st October and at other times when vacancies occur. These elections will be conducted by the Designated Person.~~

~~PAC Members are representatives in their own right and do not represent the company by which they are employed. The Designated Person election rules permit no more than one Shipper User PAC Member per company and it will be for the nominating Party to consider the suitability of their nominee, in respect of experience and understanding of the issues that the PAC will deal with.~~

~~All PAC Members and their alternates will be required to sign a Confidentiality Assurance Document and their employer (or Nominating Party in the event of persons not employed by a User) shall also be required to sign an Employer Assurance Document (Nominating Party Assurance Document) to assure that the Member will be attending and voting at the PAC in the interests of the GB gas industry and not representing any commercial interest or commercial body.~~

~~A list of all PAC Members and standing alternates is published on the Joint Office website.~~

~~A PAC Member may appoint an alternate either on a standing basis or on a meeting by meeting basis. Such appointments shall be made in writing or by email to [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk). Alternates need not necessarily come from the same company as the PAC Member. It will be for the PAC Member to consider the suitability of their alternate, in respect of experience and understanding of the issues that the PAC will deal with. A single alternate may represent more than one (1) PAC Member.~~

~~Non-Members will only be permitted to attend non-confidential sessions of the PAC.~~

## **2.32.2 Meetings**

The PAC endeavours to meet on a monthly basis. The meeting will be quorate where there are at least four Shipper User PAC Members and two Transporters (DNO and/or IGT) PAC Members with a minimum of six PAC Members in attendance.

The Code Administration Code of Practice shall apply to the conduct of the meetings.

The PAC may decide to meet more or less frequently as required.

Information to be used within meetings will be provided to PAC Members, the Joint Office and the Ofgem representative via a secure web portal. Such information shall not be downloaded by the Ofgem representative and all PAC

Members, the Joint Office and Ofgem shall treat all information as confidential unless it is clearly marked otherwise.

The default is PAC meetings are 'closed' to non-Members. PAC Members can agree to hold 'open' meetings.

With agreement of the Chairperson, and for the purposes of developing the PAC arrangements, PAC Members can invite 3rd parties and non-members to the meeting.

### 2.42.3 Decision Making

Where the meeting is quorate, all decisions shall be made by simple majority of PAC Members or their nominated alternate in both Shipper and Transporter constituencies. PAC Members may vote for or against a proposal, any abstention shall not count towards the simple majority count. Where such agreement is not obtained, the Chairperson shall submit the matter to the Uniform Network Code Committee for consideration.

Commented [AJ1]: Majority in each constituency?

### 2.52.4 Roles and responsibilities of Performance Assurance

#### Committee

~~The PAC is responsible for:~~  
~~overseeing the work of the Performance Assurance Framework Administrator;~~  
~~overseeing the PAF Risk Register;~~  
~~determining reporting and analysis to inform a reliable assessment of the performance of gas settlement;~~  
~~reviewing relevant settlement performance data; and,~~  
~~where settlement performance deficiencies are identified, proposing (and, where within the PAC's control, implementing) methods of resolution to improve settlement performance.~~

The PAC shall perform the duties ascribed to it in the "Performance Assurance Framework within the 'Document Performance Assurance Document for the (Gas) Energy Settlement Performance Assurance Scheme' for the (Gas) Energy Settlement Performance Assurance Scheme".

# Annual PAF Delivery Plan, Review & Consultation

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## 1.0 Definitions

Tbc

## 2.0 Introduction

tbc

## 3.0 Purpose

3.1 The PAF should have mechanisms in place to:

- Identify changes occurring in the market and consequently in the risk profile of gas Settlement.
- Plan and budget for the activities needed to effectively mitigate gas Settlement risk
- Recognise and learn from its own successes and failures
- Engage clearly and consistently with its stakeholders

3.2 Complemented by other PAF deliverables, including the risk register and the assurance techniques ~~and the appeals process~~, a set of annual management activities for the PAF provides:

- Stakeholder input to determine the right focus
- A baselined plan for an appropriate approach to delivering risk mitigation
- A way of agreeing an appropriate budget
- An agreed way of monitoring and reporting upon the effectiveness of the approach specified.

3.3 A review of the year, the assessments of techniques deployed and their impact by the wider industry, reflections on observations and the challenges for the year, will ultimately lead to recommendations within the plan.

3.4 The annual PAF management activities are not intended to limit the PAF or the PAC's discretion on what constitutes material risk to gas Settlement or appropriate mitigation of those risks within any given year. Risks can materialise or the profile of known risks can change inside any given year in ways which cannot be forecast. The PAF needs to be able to address emergent Settlement risk in a timely fashion.

## 4.0 Annual PAF Delivery Plan

4.1 Prior to the commencement of the budgetary year for the PAF, the PAC shall produce an Annual PAF Delivery Plan, supported by the PAFA as appropriate. The plan is intended to communicate what the PAF will deliver over the coming year and what benefit to Settlement accuracy is anticipated in doing so. It shall include:

- The PAC's view of the gas Settlement risk profile for the subsequent year
- The consequent mitigation approach and planned activities under the PAF
- The budget needed for those activities i.e. controllable expenditure such as reports, consultancy, technical audits, PAFA



- ~~An indicator~~~~estimated measure~~ of the quantity of Settlement inaccuracy being ~~targetted~~~~targeted~~
- ~~An assessment of risks and their impact~~

4.2 At the PAC's discretion, the plan may include additional content.

4.3 A draft version of the Annual PAF Delivery Plan shall be consulted upon with performance assurance parties.

4.4 A final version of the plan, approved by PAC, will be published for performance assurance parties prior to commencement of the year to which it applies.

## 5.0 Annual PAF Review

5.1 At the end of each ~~gas year~~~~anniversary year of the PAFA contract appointment~~, a review shall be carried out. The review is intended to assess the effectiveness of assurance delivery over the previous year.

The PAFA annual review will follow the process below:

- PAFA to write an annual review document that highlights the work of the PAC/PAFA over the past 12 months
- The review should include a written survey to the wider industry seeking general views on the PAC/PAFA performance as well as some targeted questions on particular areas e.g. meter read performance issues
- The PAFA shall seek feedback from industry on the activities and success of:
  - the PAF arrangements,
  - the PAFA in their role as administrator of the arrangements,
  - the PAC in their role as managers of the Performance Assurance Framework and
  - CDSP for the provision of information.
- Responses to the review should be formatted into either a subject matter focus or area of concern
- The PAFA should then write a further document in which each response / area of concern is addressed and plans for improvement/future work are detailed. The document should include achievements, statistics on interventions and positive / negative reflections.

It shall include:

- ~~Actual cost of delivery for the PAF in that year~~
- ~~Projected cost of delivery in the Annual PAF Delivery Plan for the year~~
- ~~An explanation of any significant overspend or underspend~~
- ~~An explanation of any changes made to the Annual PAF Delivery Plan within period, including the reasons for those changes~~
- ~~A view of the Settlement risk mitigated as a result of PAF activity~~
- ~~Recommendations for the subsequent period's Annual PAF Delivery Plan~~

5.2 The PAC has discretion to expand the scope of the review beyond the mandatory items above.

5.3 The draft Annual PAF Review shall be issued for consultation with performance assurance parties for an appropriate length of time. ~~The consultation shall seek feedback on the activities and success of:~~

- ~~The PAF arrangements,~~

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- ~~The PAFA in their role as administrator of the arrangements~~
- ~~The PAC in their role as managers of the PAF and~~
- ~~Xeserve for the provision of information~~

5.4 A final version of the report shall be produced by PAC, supported by PAFA, which reflects performance assurance party feedback on the draft version. This final version shall be made available to all performance assurance parties.

5.5 The report ~~It~~ shall be produced in time to inform the Annual PAF Delivery Plan for the subsequent year].

## Performance Assurance Reporting

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### Performance Assurance Risk Register

The following is the Risk Register provided under the Performance Assurance Framework Document for the (Gas) Energy Settlement Performance Assurance Scheme.

### Version History

Version	Date	Reason for new version
1.0	May 2016	Final version from Workgroup Report 0520A
2.0	Jan 2017	Draft for PAC Review
3.0	Feb 2017	Amended for PAC Review
4.0	March 2017	Amended for further PAC Review
5.0	October 2017	Amended for further PAC Review

### Contents

1. Introduction
2. Identification of a Risk
3. Risk Register
4. Risk Actions
5. Risk Progress Report
6. Closing a Risk

### Appendix 1 - Risk Template

### Appendix 2 - Risk Template Guidance

### Appendix 3 - Example Risk Template

### Appendix 4 - Risk Register

### Appendix 5 - Risk Register components

### Appendix 6 - Example completed Risk Register entry

### Appendix 7 - Example Risk Map

## 1.0 Introduction

This document sets out the supporting templates and register.

A risk can be defined as an uncertain event or set of events that, should it occur, will have an effect on the achievement of objectives. For Performance Assurance a risk is the probability that an event or action may adversely affect the performance and gas settlement arrangements. To highlight a risk for investigation is to ask the question "*what may be going wrong and what can be done about it?*"

Risk Management provides a framework within which business-critical risks can be identified, assessed, managed and reported in a visible, structured, consistent and continuous manner. Effective Risk Management will help to create and focus management action plans to mitigate against risk.

Below are details of the initial risk process for use within the Performance Assurance Framework.

## 2.0 Identification of Risk

Potential risks can be identified by a UNC party or statutory body and submitted to the PAFA. To do this a standard template is required. The Risk Template is shown in Appendix 1. A guidelines document for completion of the Risk Template is available in Appendix 2 and an example of a completed Template is available in Appendix 3.

The Risk Template should be populated with all the information necessary to aid the PAFA to register the risk and then provide this to the PAC for the next stage of the process. Should there be insufficient information to document the risk the PAFA will need to liaise with the Risk Originator to obtain the relevant information.

During this stage the PAFA will conduct an initial validation of the risk including its scoring to ensure the risk needs to be added to the Risk Register, for example ensuring that the risk identified is not a duplication of an existing risk on the Risk Register.

Once the necessary information is captured the PAFA will translate the risk onto the Risk Register.

## 3.0 Risk Register

The PAFA will translate the risk onto the Risk Register. A copy of the Risk Register is available in Appendix 4 and a definition of the components of the Risk Register can be found in Appendix 5. An example of a completed Risk Register is available in Appendix 6. All risks will be highlighted to the PAC to clarify and quantify the risk. The risk rating is scored based on the financial impacts, and the likelihood of the risk occurring. The PAC is responsible for assessing and agreeing on the score.

The risk scoring matrix looks at where this risk score is currently, what the worst case scenario could be should the risk not be addressed, and the target for the risk score following the expected mitigation actions.

Risks will be given a status based on the score (active/monitoring/closed). Where the risk is deemed to have little or no impacts it will be closed and the Risk Originator will be informed, along with a suitable explanation. Risks that are identified as having a low score with controls in place may require monitoring and therefore may remain open with a status of 'monitoring'. As and when required, the PAC will update the risk score and determine the next steps, e.g. to escalate or close the risk.

The PAFA is responsible for administering and maintaining the Risk Register. The PAFA will update the Risk Register based on the outcomes of the PAC risk discussions, actions and controls, and where necessary will close the risks.

The Risk Register is expected to be published in a location as advised by the PAC.

#### 4.0 Risk Actions and Controls

For every potential cause of a risk, a control needs to be identified. Where controls do not exist an action will be created to reduce the likelihood of occurrence of the risk. The PAC will decide on the course of action to be taken for the identified risk(s) and delegate these accordingly. All actions will have an assigned owner who is accountable for them with a defined target date. The PAFA will support the PAC to monitor and update the actions within the Risk Register and will therefore liaise with all parties and owners of actions. The PAFA will update the actions either monthly for high risks or quarterly for low risks and inform the PAC. Any actions incomplete will be subject to regular scrutiny from the PAC.

Risks are also deemed to have a control 'factor'. This is based on a three point scale of not effective, partially effective and effective predicated on the levels of control in place. As actions are implemented and levels of control established the control opinion should reflect this. Based on the control level, the gross risk score (calculated from the throughput risk multiplied by the probability), is then further multiplied by a control factor: x 1 for Not Effective, x 0.8 for Partially Effective and 0.6 for Effective. This then provides a total 'net risk' score.

#### 5.0 Risk Progress Report

A risk review date is provided on the Risk Register. For high scoring risks, this will be monthly; all other risks will be reviewed quarterly.

All risks are submitted to the PAC and will be subject to a Risk Progress Report. The Risk Progress Report is to provide an update of planned actions and risk management activities to help shape the target risk score and action progress. The PAFA will provide the Risk Progress Report to the PAC as required.

## 6.0 Closing a Risk

Risks are closed based on the result of the actions and the controls put in place. The Risk Progress Report may highlight that controls are in place and subsequently the PAC may amend a risk score. Where risk scores have reduced or have met the target and are no longer deemed to be a risk to gas settlement performance the PAC may choose to close the risk. The PAFA will update the Risk Register accordingly and notify the Risk Originator of the actions completed and the outcome of the risk they raised.

**Appendix 1 – Performance Assurance: Risk Template** Please complete the template with as much information as possible that to aid the registration and initial investigation of the proposed risk. All fields are mandatory unless otherwise specified. Please refer to the guidance notes.

Date		Raised by (include contact details)				
There is a risk that... (Risk Description)						
Because of... (Cause)						
Leading to... (consequence)						
Risk Scores		Throughput (1-5)	Probability (1-5)	Control (Not Effective, Partially Effective, Effective)	Gross Risk	Total (Net Risk)
	Current					
	Target					
	Inherent					
Current Controls Identified - Explanation			Any additional information / Supporting information (optional)			

## Appendix 2 – Guidance for populating the Risk Template

The Risk Template is designed to provide sufficient information for the PAFA to update the Risk Register and to facilitate discussions within the PAC therefore please update to the best of your knowledge.

The following fields are mandatory and should be populated. Any fields that have not been populated will result in a delay to the updating of the Risk Register.

**Date:** Date the risk is raised.

**Raised by:** Your details, including a method for communication should the PAFA need additional information and for on-going communication regarding the progress of your risk.

**There is a risk that...** A description of the source of the risk, i.e. the event or situation that gives rise to the risk. A succinct sentence of what the risk is. For example, *“there is a risk that formulae year AQ is not being calculated for all Supply points”*.

**Because of...** Identify the cause of the risk, what could pose a risk. For example, *“because reads are not being submitted by 10 Shipper organisations”*.

**Leading to ...** The consequence of the risk should it occur. For example, *“allocation of gas is not accurate and incoming Shippers may be burdened with an incorrect AQ when there is a transfer of ownership”*.

**Risk Scores** – Score the risk based on:

- Impact: Throughput
- Likelihood of occurrence.

The matrix (below) represents the risk ratings:

Rating	Throughput	Likelihood
1	0 – 49 GWh	Description – Remote Probability – <10% chance
2	50 – 249 GWh	Description – Less Likely Probability – >=10% and < 40% chance
3	250 – 499 GWh	Description – Equally unlikely as likely Probability – >=40% and < 60% chance
4	500 – 999 GWh	Description – More likely Probability – >=60% and < 90% chance
5	> 1,000 GWh	Description – Almost certain Probability – >=90% chance



**Scores** - The score is calculated by taking a score from each column based on the risk for each category. An example of this:

If a risk was identified that posed a financial risk of 100 GWh, and was deemed 50% likely to occur, the gross risk score would be: Impact (throughput) x Likelihood = 2 x 3 = 6. Multiplication by the control factor would then produce the net risk score.

The score is calculated across 3 separate categories:

- Current risk - The current position of the risk based on the analysis you have undertaken.
- Target risk - Where you would like the risk to be in the future once controls have been put in place.  
For a risk to be minimised you would anticipate a control opinion of green even if the score is not zero.
- Inherent risk – The worst case scenario should the risk occur.

All scores are subject to review and amendment by the Performance Assurance Committee.

**Any current controls identified** – Any identified controls that already exist to mitigate against the risk.

**Any additional information/supporting information (optional)** - Additional information that can be presented to the PAC to aid discussions and form actions; this may include example scenarios of the risk.

### Appendix 3 – Example Completed Risk Template

<b>Date</b>	20/04/2015	<b>Raised by (include contact details)</b>	Stephanie Stephenson Theoretical Gas Ltd. Tel: 07000 1000000			
<b>There is a risk that... (Risk Description)</b>	Meter Read performance is having a detrimental impact on rolling AQ.					
<b>Because of... (Cause)</b>	Meter Read submissions are not as frequent as they should be for class 4 sites. 5 Shippers have not hit any of the UNC targets for their portfolios.					
<b>Leading to... (consequence)</b>	Where no reading is submitted the AQ cannot be updated therefore there is a risk to allocation and settlement.					
<b>Risk Scores</b>		<b>Throughput (1-5)</b>	<b>Probability (1-5)</b>	<b>Control (Not Effective, Partially Effective, Effective)</b>	<b>Gross Risk</b>	<b>Total (Net Risk)</b>
	<b>Current</b>	3	4	Not Effective (x 1)	12	12
	<b>Target</b>	2	1	Effective (x 0.6)	3	2
	<b>Inherent</b>	5	5	Partially Effective (x 0.8)	25	20
<b>Current Controls Identified - Explanation</b>			<b>Any additional information / Supporting information (optional)</b>			

Appendix 4 – Risk Register

Risk Number		Risk Description / Title:							
Risk Number		Risk Description / Title:							
		There is a risk that...							
Date		Raised by			Risk Status		Risk Financial Estimate		
Risk Scores				Throughput	Probability	Control	Gross Risk	Net Risk	Risk Review Date
		Current							
		Target							
		Inherent							
Associated Risk						Category			
Potential Causes of the risk		Potential Consequences of the Risk Event Occurring		Controls		Actions		Owner and Target Completion Date	



Appendix 5 - Risk Register components

- **Risk Number** – unique Risk Number for identification (assigned by the PAFA).
- **Risk Description / Title** – a concise definition of what the risk is (not to be confused with what the risk consequence may be)
- **Date** – the date the issue is raised
- **Raised by** – the Originator of the risk to ensure they can be informed of progress
- **Risk status** – active/monitoring/closed
- **Control opinion** – this is based on the controls in place – categorised with a scale of Not Effective, Partially Effective and Effective based on the matrix (below):

Not Effective	Key controls have not been established or are deemed to be ineffective. Action plans to rectify the fundamental weakness have still to be fully identified and agreed.
Partially Effective	Key controls are in place but have either not been subject to suitable assurance activity or testing reveals that some control improvements, not deemed to be fundamental, are required.
Effective	Key controls are in place, are tested periodically as appropriate and are deemed satisfactory. This testing includes independent challenge where the risk is deemed significant (e.g. from Internal Audit or another independent assurance provider).

Risk Scores

- Throughput Risk
- Likelihood of Occurrence

The matrix below again shows the risk ratings.

Rating	Throughput	Likelihood
--------	------------	------------

1	0 – 49 GWh	Description – Remote Probability – <10% chance
2	50 – 249 GWh	Description – Less Likely Probability – >=10% and < 40% chance
3	250 – 499 GWh	Description – Equally unlikely as likely Probability – >=40% and < 60% chance
4	500 – 999 GWh	Description – More likely Probability – >=60% and < 90% chance
5	> 1,000 GWh	Description – Almost certain Probability – >=90% chance



**Scores** – Based on the throughput impact should the risk occur x the probability of occurrence x the control factor:

- Any score above 15 requires action with frequent monitoring and monthly reporting to the PAC.
- Any score between 8 and 15 will be actioned and monitored but will only be reported into the PAC on a quarterly basis.
- Scores below 8 – risk will be closed.

The score is calculated across 3 separate categories:

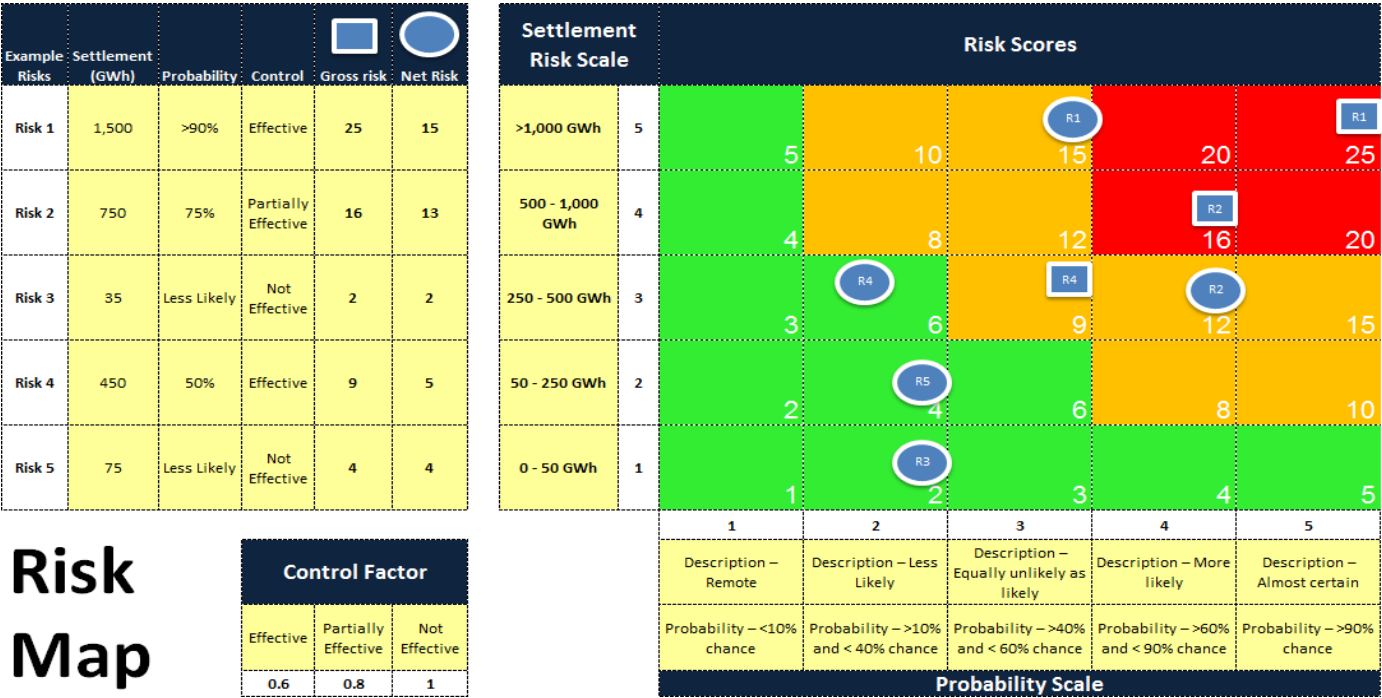
- Current risk - The current position of the risk based on analysis.
- Target risk - Where the PAC would like the risk to be in the future once controls have been put in place.
- Inherent risk – The worst case scenario should the risk occur.
  
- **Risk Review Date** – A review date needs to be supplied for reviewing the risk.
- **Associated Risk** – If this links to any other risk(s) within the Risk Register this will list the linked Risk number(s).
- **Risk Category** – Proposal to categorise risks
- **Potential causes of the Risk** – Identification of all the causes that may be creating the risk.
- **Potential Consequences of the Risk Event Occurring** – Detailing the consequences should the risk occur.
- **Controls** – For every potential cause of a risk a control needs to be identified to mitigate against the risk. Where there is no control an action will be created.
- **Actions** – The actions are identified to reduce the risk of occurrence based on controls identified. The actions are specific and have an identified owner and target date of completion. All actions are required to be reviewed and updated quarterly as a minimum. The result of a completed action is that a control has been implemented which in turn will reduce the risk score and may influence the risk status.
- **Owner** – Identification of an owner to complete the action. In some scenarios this may entail all industry parties; in other scenarios this may be one organisation or may be the PAFA.



Appendix 6 – Example completed Risk Register entry

Risk Number	2	Risk Description / Title:	Incomplete Meter Read Submissions					
		There is a risk that...	Meter Read performance is having a detrimental impact on rolling AQ					
Date	21/04/2015	Raised by	Steven Stevenson (Theoretical Gas Ltd.)	Risk Energy and Financial Estimate	Allocation (GWh)	-	Allocation (£ '000)	-
Risk Status (Active / Inactive)	Active				Reconciliation (GWh)	150	Reconciliation (£ '000)	3
Risk Scores			Throughput	Probability	Control	Gross Risk	Net Risk	Risk Review Date
		Current	3	4	Not Effective (x1)	12	12	Initial discussions to be held at the PAC <sup>0</sup> on 5th May and scores to be agreed
		Target	2	1	Effective (x0.6)	2	1.2	
		Inherent	5	5	Partially Effective (x0.8)	25	15	
Associated Risk	n/a				Category		Settlement	
Potential Causes of the risk		Potential Consequences of the Risk Event Occurring (e.g.. Because of ...)		Controls	Actions		Owner and Target Completion Date	
Meter Read submissions are not as frequent as they should be for class 4 sites. 5 Shippers have not hit any of the UNC targets for their portfolios.		Where no reading is submitted the AQ cannot be updated therefore there is a risk to allocation and settlement.		Targets are set to mitigate against this risk: Monthly MRF: 90% per calendar month; SSP Annual: 70% in 12 month period; LSP Annual: 90% in 12 month period Further incentives may be required.	To be agreed at meeting 05/05/15.		To be agreed at meeting 05/05/15.	

Appendix 7 – Example Risk Map



Risk Map

## Report Specification Template

The following is the Report Specification Template provided under the Performance Assurance Framework Document for the (Gas) Energy Settlement Performance Assurance Scheme.

This is one of the documents governed under the Performance Assurance Framework Document for the (Gas) Energy Settlement Performance Assurance Scheme.

## Version History

Version	Date	Reason for new version
1.0	June 2015	Final version for Workgroup Report 0506

### Report Template

Report title	
Report reference	
Purpose of report	
Expected interpretation of report results	
Report structure (actual report headings and description of each heading)	
Data inputs to the report	
Number rounding convention	
History, e.g. report builds month on month	
Rules governing treatment of data inputs (the actual formula/specification to prepare the report)	
Design questions awaiting a response	
Frequency of report	
Sort criteria - alphabetical, ascending, etc.	
History/background	
Additional comments	
Estimated development cost	
Estimated ongoing cost	

Example report format

Title				
Date				
Data	Data	Data	Data	Data
Data	Data	Data	Data	Data
Data	Data	Data	Data	Data

# Appeals Procedure for the PAF

## 1.0 Definitions

tbc

## 2.0 Introduction

tbc

## 3.0 Purpose

3.1 To enable it to deliver upon its purpose of identifying and mitigating gas Settlement inaccuracy, the gas PAF gives PAC the power to apply Performance Assurance Techniques (PATs) to various industry roles. The circumstances in which PAC can do this for each PAT are set out in the ~~section ancillary document~~ on PAT's.

3.2 The parties to whom the PATs are applied (the subject of a PAT) can be materially affected, financially, operationally or reputationally, by their application.

3.3 The ~~party~~ subject ~~to~~ a PAT may believe that the accuracy of the information underpinning PAC's use of a PAT is materially and demonstrably incorrect. It may also believe that the procedure surrounding use of the PAT, as set out in the PAT technical document, has demonstrably not been followed, resulting in a material impact on the ~~m~~-subject.

3.4 In these circumstances, the subject of the PAT is entitled to appeal the PAC's decision to the ~~PAC~~UNCC. The decision of the ~~PAC, having considered the new information in respect of the UNCC regarding the~~ appeal is final.

## 4.0 Criteria for an appeal

4.1 The criteria for a valid appeal, ~~to be put before UNCC, are~~ is as follows:

- The inaccuracy of fact or irregularity of procedure can be demonstrated, such that there is specific alternative information on which PAC should instead rely or a specific alternative way in which a procedure should have been enacted
- A material inaccuracy of fact or irregularity of procedure has occurred, such that the outcome would be different if the correct information or procedure were used instead
- The appeal must be raised with ~~the PAC~~UNCC within **[1 month]** of the relevant PAC decision

4.2 Where the appellant is appealing a PAC decision to refer the appellant to Ofgem, the appellant will have a second appeal opportunity that will be heard by the UNCC in such circumstances.

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**Commented [AJ2]:** Add in process.

## 5.0 Procedure

5.1 The gas PAFA will assess any appeal in respect of whether the criteria for the appeal has been met and regarding the use of a PAT in the light of the new information provided on the above basis, before presenting the appeal to PACUNCC at the next practicable opportunity.

5.2 The PAFA's initial views on the validity of the appeal and the appropriate rectification will be presented to the PACUNCC alongside the appellant's representations.

5.3 ~~PAC's will be informed of the appeal. Its~~ original reasons for applying the PAT will form part of the material PAFA reviews and provides to PAC UNCC to aid its decision on the appeal.

5.4 During the period between an appeal being raised and the PACUNCC hearing the appeal, any obligations on the appellant, PAC and PAFA pursuant to a PAT which is wholly or partly the subject of the appeal will be suspended. The ~~PAC's UNCC's~~ decision on the appeal will include guidance for resumption or termination of timescales for action under any of the PATs at issue.

5.5 The PACUNCC will treat the matter as confidential. All meetings to hear the appeal will be closed and the meeting and the material presented for consideration during an appeal will not be published.

5.6 The appellant may be invited to present their case and their supporting evidence. Notice of the meeting will be not less than two weeks.

5.7 The PACUNCC will determine the extent to which it accepts the appeal. This could be wholly, partially or not accepted. The PACUNCC may recommend or provide guidance on how or whether the application of the original PAC decision resumes or continues.

## 6.0 Appeal Decision

6.1 The ~~UNCC-PAC~~ will respond in writing to the appellant within two weeks of making their decision with the reasons for its decision. ~~The decision will also be copied to the PAC.~~

6.2 ~~The UNCC will also include its recommendations or guidance to the PAC within any letter to the appellant.~~

~~6.3~~ Where the appellant remains of the view that their reason for appeal is valid and that the UNCC have not taken a fair and balanced view of their evidence, the appellant may appeal to Ofgem. Any PAT's may resume or be continued until Ofgem provides its decision. The decision of Ofgem will be final.

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# Performance Assurance Techniques (PATs)

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## 1.0 Definitions

*tbc*

## 2.0 Introduction

*tbc*

The Performance Assurance Techniques (PATs) are the PAF's toolkit for identifying, quantifying and rectifying Settlement error. The PAC determine which PATs are applied to an instance of undue Settlement risk or compliance failing, subject to the PAF appeals process.

## 3.0 Purpose and Usage

3.1 The PATs available under the PAF are set out below, with an explanation of what they are, how the PAF will generally use them and any specific procedural steps relevant to a given PAT.

3.2 The general principle under which the PATs are listed here is that the PAC can, unless specifically proscribed from doing so through the content of the PAF technical documents, apply the PATs in any way that it deems appropriate to effecting the mission and objectives of the PAF.

## 4.0 Monitoring

4.1 Monitoring facilitates the detection and management of Settlement errors, by using the retrieval and analysis of data to quantify error, track changes in it over time, facilitate resolution and inform PAC's use of other PATs.

4.2 PAC may undertake market monitoring as it deems necessary to fulfil the mission and objectives of the PAF. Such monitoring shall occur on a frequency and for a duration to be determined by PAC. It shall apply to the whole market or to a segment of the market **or an individual party** as PAC deem appropriate.

4.3 If PAC determine that a particular form of monitoring is required, it will specify the data items, purpose, source and any provision deadlines for the monitoring, along with any other information it believes is necessary for performance assurance parties understanding of the intent of the monitoring and any obligations they have in relation to it. PAC may publish this information to all performance assurance parties if it believes doing so is necessary to achieving the stated purpose of the monitoring.

4.4 The appropriate data provider is for PAC, with PAFA support where appropriate, to determine on a case-by-case-basis. Data providers may include, without being limited to:

- CDSF
- The performance assurance party themselves – “self-reporting”
- Other UNC parties

4.5 Where PAC requests data from a performance assurance party which is subject to a deadline for provision, it will advise the party of its request and the deadline for it in writing. PAC may, ~~subject to the PAF appeals process,~~ determine that any failure to provide requested monitoring by the deadline it has stipulated is a further risk to Settlement, and apply other PATs to mitigate that risk.

## 5.0 Party Communication

5.1 Communication allows the PAC to formally set out for a party:

- Its concerns regarding a party's contribution(s) to one or more Settlement risks, including the impact the party's (in)action is having upon Settlement accuracy.
- Its expectations of the party in relation to risk identification, quantification, resolution or other relevant performance matters
- Provide timescales for any action it expects the party to undertake
- Explain the consequences of failing to comply with the PAC's request

5.2 Letters will be sent to an employee of the organisation who, in PAC's view, has the authority to address the subject of the communication.

## 6.0 Request attendance at PAC

6.1 The attendance at a PAC meeting of an appropriate representative gives PAC the opportunity to understand the root causes of Settlement issues better, aiding the choice of appropriate remedial actions. It also gives the party in question an opportunity to present its point of view directly to the PAC.

6.2 PAC may request that a representative of a performance assurance party attend PAC. It may, having regard to the mission and objectives of the PAC, do this for any reason that it specifies in writing to the party. It need not carry out other PATs prior to requesting attendance at PAC or follow any other preliminary steps.

6.3 If the PAC requests party attendance at the PAC, it shall provide [20 working days] notice of this fact to the party in writing, setting out the reasons for the request and anything else it believes is material to the party's ability to nominate an appropriate representative.

6.4 If the party does not send a representative or sends a representative who, in PAC's view, is not appropriate, PAC may choose to use any other PATs it believes are appropriate to mitigate the Settlement risk.

6.5 Party representatives should have suitable authority to speak for the Party as commitments made by a representative to the PAC will be noted and delivery expected.

## 7.0 Request for a resolution plan



7.1 A resolution plan provides a baseline for the approach and timescales a party intends to adopt when resolving a Settlement issue or mitigating a Settlement risk. It gives the PAC a point of reference from which to monitor a party's progress in resolving performance issues and gives the party clear expectations to work from when addressing performance issues. It is a contract between the PAC and the assurance party which provides mutual clarity on expectations and the basis for shared tracking of progress.

7.2 The PAC may request a resolution plan from a party when, having regard to the mission and objectives of the PAF, it believes one is necessary to adequately mitigate a settlement risk or issue.

7.3 If the PAC requests a resolution plan it shall set out its reasons for the request to the party, in writing, along with what sort of content and timescales it expects to see in the plan and the date for the party providing it by which the plan should be returned.

7.4 Upon receipt of a request, a party shall prepare the plan and accompanying narrative to highlight milestones from which the PAC may judge progress and achievements. It will be assumed by the PAC that any resolution plan submitted is achievable, and parties will be expected to deliver to the plan they have provided.

7.5 Upon timely receipt of a resolution plan, the PAC shall review the plan and consider whether the delivery outcomes and timetable offset the specific issue identified and in the expected timescale. The PAC will confirm that the plan has been received and accepted.

7.6 The PAC may have supplementary questions about the resolution plan and may also ask a party to present their plan at a closed PAC meeting.

7.7 If the PAC does not receive a resolution plan which meets the timescales specified by the PAC and / or contains the information it requested, **it may consider the act a further compliance issue and deploy another PAT.**

## 8.0 Publication

8.1 Publication provides a mechanism for making all performance assurance parties aware of the scale and root causes of a Settlement issue, as well as the performance assurance party(s) who is responsible for rectifying it. It therefore ensures better awareness of Settlement risks and errors, as well as incentivising timely and proportionate remedial action.

8.2 The PAC may decide to publish any information relating to a Settlement risk or error it is aware of at any given point in time, including the party responsible, provided it does so in a way that conforms with data privacy legislation.

8.3 If the PAC determines that publication is necessary, it will inform any parties who will be included within it **[10 working days]** before publication, including an explanation for why they are publishing the information and what action PAC expects to occur as a result.

8.4 The PAC shall not be required to withdraw the publication for any ~~other reason, than temporarily in the event of commencement of an appeal against the decision to publish or completely in the event of an appeal against publication being upheld by UNCC.~~

## 9.0 Training

9.1 Training is a way of remedying the root causes of a Settlement error or of mitigating a Settlement risk. It ensures parties and their employees are aware of what can lead to Settlement error and how to either prevent or correct it.

9.2 PAC may decide to mandate a party undertake training on any topic it believes is relevant to mitigating a Settlement risk or reducing Settlement error. It may do this at any time and without any prerequisite steps or PATs being needed.

9.3 PAC shall set out in writing the training it expects the party to undertake, the reasons for it mandating that the training occur, the segment of party's employees it expects to receive the training and its expected provider for the training.

9.4 PAC shall advise the party, in writing, of a reasonable deadline by which it expects the training to be complete.

9.5 Upon receipt of PAC's written request for training to be undertaken, the party shall respond to PAC within **[15 working days]**, advising it of when it expects the training to be complete.

9.6 The cost of training will be the responsibility of the party being asked to undertake the training.

## 10.0 Audit

10.1 An audit is a systematic review of a set of business practices, intended to highlight the level of conformity with expected practice inside an organisation. It provides a rigorous, structured and independent view of the risk the subject of the audit poses to gas Settlement or of the level of error attributable to them, as well as a mechanism for clarifying expectations and managing progress toward resolution.

10.2 An audit can be carried out across the entire market or against a targeted segment of the market. It may involve auditing a wide range of connected business processes or targeting specific areas of activity.

10.3 PAC may, having regard to the mission and objectives of the PAF, decide to conduct an audit whenever it believes one is warranted. It may decide to carry out a certain type of audit on a fixed frequency basis, and/or to carry out ad hoc audits as it deems necessary.

10.4 If the PAC decides to conduct an audit, it shall give the parties who will be the subject of the audit reasonable notice of this fact, having in mind the scale of the intended audit, its subject matter, any data provision needed in relation to it and resource commitment from the audited party.

10.5 PAC shall, when giving notice to parties being audited, set out the scope of the audit, who will carry it out, its format (remote or on-site, for example), the methodology that will be used to conduct it, including the way parties will be assessed and conclusions reached, and the way it intends for audit issues to be managed subsequent to audit completion.

10.6 The costs of any audit and those of the party will be recovered from the party being audited where, in the sole judgement of the PAC, there is evidence supporting their decision to initiate the audit.....

10.7 The costs expended by the party in supporting the audit will be born solely by the party subject to the audit.

~~10.6~~

## 11.0 Referral to Authority

11.1 A referral to the Authority is intended to make the Authority aware of the scope and scale of a Settlement risk or Settlement error, including, if relevant, the behaviours PAC has observed in relation to one or more parties contributing to that risk or error. It invites the Authority to exercise its powers in relation to a Settlement risk, error or the behaviours surrounding them.

11.2 PAC shall advise any parties who are the intended subject of a referral in writing of its intention to refer to the Authority and of the reasons for and content of the referral. It shall give notice to the party of this intention prior to sending the referral to the Authority, such that the party is able to make its own representations to the Authority regarding the referral, if it wishes to do so.

11.3 The PAC will provide any additional information or evidence requested by the Authority in each case, along with any performance information, the measures and PATs deployed by the PAC and the responses and information received from the party.

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