

# Rough Order of Magnitude (ROM) Request and Response

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## 1. Purpose of a ROM

The DSC CDSP Service Document – Change Management Procedure sets out the expectations of the ROM process.

4.6.2 Subject to paragraph 4.6.3, within 10 Business Days after receiving a ROM Request, the CDSP shall send to the Customer and the Committee a report (Rough Order of Magnitude Report or ROM Report) setting out (so far as the CDSP is able to assess at the time):

(a) a high level indicative assessment of the impact of the Potential Service Change on the CDSP Service Description and on UK Link;

(b) the CDSP's opinion as to whether the Potential Service Change would be a Restricted Class Change, would have an Adverse Impact on any Customer Class(es) or would be a Priority Service Change, where applicable;

(c) the CDSP's approximate estimate of:

(i) the Costs (or range of Costs, where options under paragraph (e) are identified) of Implementing the Potential Service Change;

(ii) the impact of the Potential Service Change on Service Charges; and

(iii) the period of time required for Implementation;

(d) any material dependencies of Implementation on other Proposed Service Changes or other likely Priority Questions; and

(e) if it is apparent to the CDSP that there are likely to be materially different options as to how to implement the Potential Service Change, a high level description of such options.

## 2. ROM Request – To be completed by the customer

Please populate the details below and send to [box.xoserve.portfoliooffice@xoserve.com](mailto:box.xoserve.portfoliooffice@xoserve.com), to enable the CDSP to undertake the impact assessment to provide the ROM Response (section below).

Please note, the ROM requestor may be asked for further details if it is believed that request is not clear and additional information is required in order to provide a ROM Response.

### 2a. ROM Request Details

ROM Request Details	
<b>Change Title</b>	Modification 0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067 (XRN5535b)
<b>Regulatory Impact</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Regulatory Reference (if applicable)</b>	Regulation changes allocated reference and associated Code UNC Modification 0836. <a href="#">MOD 0836</a>
<b>Change Overview</b>	<p>Following the implementation of CSS, it became clear that the processes within the Switching Operator were not sufficiently reactive to ensure that in the event of an incident that the GRDA would receive all Gate Closure messages within the time periods that we had defined.</p> <p>There have been incidents whereby systems that interface with the CSS have not received expected messages because they have not been generated, or because of issues in transmission or receipt of the messages. Modification 0836 clarifies treatment and activities necessary when the CSS Registration Effective from Date does not align to that recorded in the UK Link system due to this issue.</p> <p>The below points are subject to a UNC Modification 0836, which this ROM is looking for the CDSP to assess:</p> <ul style="list-style-type: none"> <li>- Generation of any transportation invoice adjustments</li> <li>- Generation and application of a Meter Reading for the CSS Registration Effective Date</li> </ul> <p>This ROM is to estimate the high-level effort to implement Modification 0836 requirements, which are expected to be delivered under XRN5535(b).</p> <p>Please find a little more context for each element below to support with defining the costs and effort.</p> <p><b>Generation of any transportation invoice adjustments</b></p>

- The Modification includes a Materiality Test to avoid small adjustments being generated which will impose costs upon all impacted parties to manage which will exceed the value of the adjustment itself:
  - o Mod 0836 proposes the materiality test utilises the value defined in REC Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues, paragraph 9.4 which determines whether a Supplier Agreed Reading process must be undertaken.
  - o The REC process is triggered where "the difference between the Energy Supplier's view of consumption and that derived from the Switch Meter Reading must be in excess of 1,200kWh for a gas RMP"
  - o The CDSP will perform the Materiality Test at the end of the third month following the UKL Registration Effective Date (e.g. if the Registration takes effect on UK Link systems in February, then the CDSP will perform the Materiality Test no earlier than the final Working Day of the Month 3 months after the Registration was effective in UK Link systems – e.g. 31st May 2023).
  - o For the avoidance of doubt Meter Readings may be replaced following the Materiality Test being conducted, but any such Replacement Readings will not be factored into the Materiality Test nor amend the result of a previous Materiality Test, nor amend any Adjustment undertaken for this reason. This means that any Replacement Readings must be accepted by the CDSP prior to this point in order to be considered for the Materiality Test and Adjustment.

#### **Generation and application of a Meter Reading for the CSS Registration Effective Date**

- The CDSP will insert a Meter Reading on the date that the Supply Point Registration of the CSS Supply Point would have become effective in the Supply Point Register, had all messages been generated and received successfully. This Meter Reading will only be inserted where a Meter Reading does not otherwise exist in UK Link systems on the CSS Registration Effective Date.
- This Meter Reading will be a Valid Meter Reading – i.e. it would be used for reconciliation (i.e. a Reconciliation Meter Reading), and could be used for AQ – but since it is proposed that this is added once the Opening Meter Reading has been loaded then it is unlikely to be utilised as the AQ Closing Reading.
- Treatment of this Meter Reading will be different from a standard Opening Meter Reading in that only the User who is recorded on UK Link systems (i.e. the party that will become the Outgoing User with UK Link systems are updated with the Supply Point Registration) will be able to replace this, as opposed to the incoming User.

- Based on the low level of sited anticipated, we would expect an option to re-use reads and manual notifications as detailed below.
  - o Re-use of existing read reason codes for CSS Reg EFD;
  - o Manual notification of the Reading to Shipper B (i.e. what would have been the Proposing User);
  - o Retention of Readings offline if they can't be loaded to UK Link (e.g. Check to Check period).

Please note, any specific requests for development of automated reporting to support CSS Recorded Shipper, if required longer term, will be dealt with separately under a DPM Conditionality Request change, on a case-by-case basis. Based on this, it does not need to be considered and assessed under this ROM. **For the avoidance of doubt, the manual generation of the reporting will be stopped.** This manual reporting was provided where the period between the CSS Registration Effective Date and the UKL Registration Date was significant (in some instances this will have been 7 months). Following implementation of R0067 this period will be significantly reduced – e.g. less than 5 working days, and hopefully less as the process becomes more refined.

*Additional context on the XRN:*

To confirm, [XRN5535 – Processing of CSS Switch Requests Received in 'Time Period 5'](#) was amended from its original scope to address the immediate Registration issues to enable the CDSP to progress Registrations on UKL. The following was included in the scope of XRN5535 part A:

- *Identify missing messages from CSS and raise incidents with the CSS system*
- *Create a process to manage receipt of 'proxy Secured Active Notifications' (i.e. a message received from the Switching Operator to indicate where a Registration has become active where the Secured Active Notification has not been received by the Gas Retail Data Agent. This process to include generation of communications to the impacted Losing and Gaining Shipper including prompting of a re-submission of a BRN, as required.*
- *Enable the CDSP to generate a Registration in the UK Link system in the absence of a Secured Active Notification*
- *Manage reporting to the 'CSS Recorded Shipper' (i.e. a Shipper who is recorded on the Central Switching Service as the registered Shipper, but as a result of the 'missing message' issue is not recorded as the Registered User (i.e. Portfolio Shipper) in the UK Link system)) to provide reporting to highlight:*

	<ul style="list-style-type: none"> <li>○ Updates to the UK Link system from the previous Shipper in the period after the CSS Registration Effective Date; and</li> <li>○ Rejected UK Link Communications submitted by the CSS Recorded Shipper in the period after the CSS Registration Effective Date</li> </ul>	
	02/06/2023	
<b>Required Response Date</b>	16/06/2023	
	We would like to present this at workgroup on the 22nd June.	
<b>Requestor Contact Details</b>	Name:	David Addison
	Organisation:	Xoserve Limited
	Email:	<a href="mailto:RECChange@xoserve.com">RECChange@xoserve.com</a> David.Addison@xoserve.com
	Number:	
<b>Xoserve Lead Contact (to be provided by the CDSP)</b>	Contact Name:	David Addison
	Contact Email:	David.Addison@xoserve.com

## ROM Response – To be completed by the CDSP – XRN5535 Part B

The ROM response provided is based on a high-level indicative assessment of the impact of the change.

To find the high-level costs and timescales please go to section 3c which can be found [here](#).

### 3a. Impacted Constituency

Customer Class(es) Impacted by Change:	<input checked="" type="checkbox"/> Shipper	<input type="checkbox"/> Distribution Network Operator
	<input type="checkbox"/> NG Transmission	<input type="checkbox"/> IGT
	<input type="checkbox"/> All	<input checked="" type="checkbox"/> Other - Suppliers
Justification for Customer Class(es) selection	This change will reduce the risk of UKLink systems being misaligned with the CSS – which is responsible for mastering Registration of CSS Supply Points. Shippers will also be in receipt of any Meter Readings generated by the CDSP. Consequently Shipper (and Supplier) systems may have impacts as a consequence of UKL and CSS being misaligned.	

### 3b. Overview of impacts

Overview of impacts	<p><b><u>Proposed 'To Be' Processes for XRN5535 Part B.</u></b></p> <p>Assumptions.</p> <p>A1. This ROM response for XRN5535 Part B (Modification 0836S) assumes that:</p> <ul style="list-style-type: none"> <li>(1) the operational process for XRN5535 Part A has been implemented and is operating on a Business As Usual (BAU) basis until March 2025.</li> <li>(2) any business/system process that is created in support of XRN5535 Part B does not require any part of the solution for XRN5567 (REC0067) to exist beforehand. We note that 5535A and B processes will both need to be reconsidered separately as part of XRN5567.</li> </ul> <p>A2. This ROM response for XRN5535 Part B (MOD0836S) assumes that the frequency of 'missing messages' will be for 15, or fewer, for End Consumers, per calendar month - i.e., fewer than 180 cases per year. This figure is based upon there having been, from January 2023 to June 2023, circa 20 valid incidents of 'missing messages', equating to 4 per month. This figure is reflective of the stable CSS/Landmark systems after issue fixes were applied. Also, this figure is expected to decrease in future years due to the</p>

implementation of the operational process for XRN5535 Part A, and the future implementation of XRN5567 in 2023. This enables us to size the operational effort anticipated to support this process on a normal basis.

**During the time of this ROM production we note the P1 Incident that has occurred where there are a projected c84k 'missing' Registrations. Should such an event arise in the future we would need to manage this as an incident. Management of this process – having been classed as an incident – would not be managed as an operational process therefore such incidents have been excluded from the planned operational costings. IF such incidents became frequent then we would need to re-assess the processes and operational efforts.**

The above projection (circa 180 per annum) will be monitored and if appropriate support costs revised accordingly.

A3. Any business/system solution for 5535 Part B will not seek to update a Registration Effective Date to be a retrospective date unless the site is a Greenfield site, where CDSP assessment will be undertaken to determine if this can be retrospectively updated. Otherwise such updated dates will always be prospective.

A4. No changes will be required to the proposed 5535 Part B To Be process to handle Supply Points on an IGT network – i.e., it will be the same process for GT and IGT sites.

**Ability for the CDSP to update Supply Point Registration details.**

This Modification proposes that in the event that the CDSP becomes aware that Supply Point Registration details in the UK Link system are not aligned to CSS, then the CDSP is able to update the details prospectively in the UK Link system as soon as is practicable.

**ROM Response**

1. This ability has been delivered by a manual operational process as part of 5535 Part A. Subject to the assumption that the ongoing frequency of 'missing messages' will continue to remain low (see Assumption A2), then this operational process can continue to remain manual. However, the process should be re-evaluated as part of XRN5567/REC0067 together with any benefits and efficiencies that automation can introduce when aligning to 5567.
  - a. **Risk.** If the situation ever arises that a large number of 'missing messages' happen, then this will have to be dealt with as a Service Desk incident, separate to the established 5535 Part A BAU process. Correla will assess, at that time, what constitutes a 'large number'

of 'missing messages' that marks the situation as an incident instead of being handled by the BAU process.

#### **Responsibility for a Supply Point.**

This Modification seeks to clarify the responsibility for the Supply Point in the exceptional event that CSS and UK Link systems are misaligned. In these exceptional circumstances the CSS Recorded Shipper (i.e. a Shipper who is recorded on the Central Switching Service as the registered Shipper, but as a result of the 'missing message' issue is not recorded as the Registered User (i.e. Portfolio Shipper) in the UK Link system)) will be responsible for the Transportation invoicing – which the CDSP will invoice as an adjustment. This is intended to be an exception statement in the event that CSS and UK Link are misaligned only.

#### **ROM Response**

1. Modification 0836S enables the CDSP to be able to invoice a party (i.e., Shipper) for the period of time that party was recognised by CSS as being responsible for a given Supply Point. It is anticipated that following implementation of R0067 (and XRN5567) any missing Registration is able to be acted upon more promptly than to date where we are reliant upon P4 incident responses from the Switching Operator Service Desk (10 WD Resolution timescale). Which, in addition to the materiality test, means that XRN5535 Part B To Be process shall include a manual process to occasionally have to adjust Transportation invoicing, as well as read insertion.
2. XRN5545 Part B To Be process shall include an updated manual process to communicate with the impacted party with the following types of detail:
  - a. What was the missing period in accordance with the Modification
  - b. That a 'materiality assessment' will be completed by the CDSP, to identify the Cost/Volume of energy in the missing period and that the outcome of this materiality test will be communicated to the relevant Shipper(s), and
  - c. If the threshold for the 'materiality assessment' is exceeded, then an invoice adjustment will occur.

#### **Insertion of a Meter Reading for the CSS Registration Effective Date.**

- a. **From Modification 0836S:** This Modification proposes that the CDSP inserts a Meter Reading on the date that the Supply Point Registration of the CSS Supply Point would have become effective. Such Meter Reading will be notified to both Registered User (i.e. the Portfolio Shipper) and the CSS Recorded Shipper. This will enable Users to continue to use this Meter Reading as if the CSS and UK Link systems were aligned. Only the User who is recorded



on UK Link systems (i.e. the party that will become the Outgoing User when UK Link systems are updated with the Supply Point Registration) will be able to replace this, as opposed to the incoming User. It is expected that both Shippers will co-operate with one another and ensure that any alternative Meter Reading that is agreed must be replaced by the User able to do so. The methodology for Meter Reading estimation will be determined by the prevailing Class at the time of the CSS Registration Effective Date and in accordance with UNC TPD 5.4.1 and 5.4.2 for Classes 1 and 2, and for 3 and 4, respectively. It is not expected that Meter Readings will be required for Class 1 and 2 Supply Meter Points it would be expected that other daily read processes would have already inserted a Meter Reading, but the ability to insert such Readings should not be prevented if required. For Class 3 and 4 Supply Meter Points (i.e. use the NDM Supply Meter Point Demand in accordance with TPD M5.4.2, and for the avoidance of doubt if there is a later Meter Reading than the CSS Registration Effective Date Meter Reading, then the consumption will be profiled using this methodology between the Meter Readings preceding and following the CSS Effective Date).

**b. Further details from the ROM Request:**

- The CDSP will insert a Meter Reading on the date that the Supply Point Registration of the CSS Supply Point would have become effective in the Supply Point Register, had all messages been generated and received successfully. This Meter Reading will only be inserted where a Meter Reading does not otherwise exist in UK Link systems on the CSS Registration Effective Date.
- This Meter Reading will be a Valid Meter Reading – i.e. it would be used for reconciliation (i.e. a Reconciliation Meter Reading) and could be used for AQ – but since it is proposed that this is added once the Opening Meter Reading has been loaded then it is unlikely to be utilised as the AQ Closing Reading.
- Treatment of this Meter Reading will be different from a standard Opening Meter Reading in that only the User who is recorded on UK Link systems (i.e. the party that will become the Outgoing User with UK Link systems are updated with the Supply Point Registration) will be able to replace this, as opposed to the incoming User.
- Based on the low level of sited anticipated, we would expect an option to re-use reads and manual notifications as detailed below.
  - Re-use of existing read reason codes for CSS Reg EFD.
  - Manual notification of the Reading to Shipper B (i.e. what would have been the Proposing User);
  - Retention of Readings offline if they can't be loaded to UK Link (e.g. Check to Check period).

**ROM Response**

1. XRN5535 Part A does not support the insertion of a meter reading.
2. XRN5535 Part B To Be shall seek an enduring solution to this requirement.

The high level analysis has been performed and the solution is proposed considering the volume of this request which is minimal. This option will be a mix of automated and manual approach. As the new read value will be inserted post the CSS registration request goes live when this activity needs to be performed needs to be agreed and accordingly the read will be inserted into the system.

Below are the solution approach.

- 1) A new screen will be developed which will have mechanism to enter MPRN and date information for which the read needs to be inserted into the system.
- 2) This will estimate a read based on the previous read and next read if present in system and store it against the date passed from the screen.
- 3) Read reason will be CYCL for the newly created entry and Read type will be E. Forward and backward volume (if subsequent read present in system) will be stored against the read entry.
- 4) The newly created read will be sent to the previous shipper (Shipper who owns the site as on read effective date) vis MBR flow.
- 5) Business user to send the read value to CSS recorded shipper offline (Manual notification).
- 6) This read will be used for reconciliation but not used for tolerance validation. This will not be used as an end read for AQ roll process.
- 7) An existing field can be reused in the read custom table to differentiate these reads.

Either the business or Tech Ops can insert the read. Reports can be extracted multiple times. This can be a scheduled report which can be sent to business users automatically. It can be manual. The preferred option is to trigger the program manually, but if needed it can be scheduled.

Assumptions :

- 1) This change will impact Class 3 and 4 sites because of Class 1 & 2 sites there will be daily reads.
- 2) Even if there may be a change Class requested as part of original CSS registration request but as part of this change the read will

be loaded to the existing class as on original CSS registration date.

- 3) If there are reads already present in system as part of other activities, then no read will be inserted into system. This check to find if reads present in system or not will be done offline.
- 4) The read value will be displayed in GES and flow to other downstream systems.
- 5) One read value can be inserted into the system at a point of time.
- 6) The activities part of reporting requirements will be finalised in the detailed design.
- 7) The update report can be extracted for more than one MPRN at a point of time. Tech Ops or business users can execute the report by passing the MPRN and date information.
- 8) Exceptions - not being able to insert a read. The only scenario that a read is not needed is if a read entry is already existing for the day. In such a case the read is not required. No read will be loaded if there are no devices attached to the site.

#### **Materiality Test, and Assessment by the CDSP.**

- This Modification proposes that the CDSP will assess the materiality of the adjustment required once the Registration has taken effect and the Opening Meter Reading and the CSS Registration Effective Date Meter Reading has been recorded in UK Link systems. Modification 0836S proposes that the CDSP shall perform the [one-off] assessment against the Materiality Test defined in REC Schedule 30, paragraph 9.4(b)'.
- For the avoidance of doubt, this is not intended to include a consumer test that is defined in the REC Schedule whether they are willing to accept 'an accommodation' – which is also included in the above paragraph in the REC. This will mean that where the energy value derived between the energy determined between the Readings on the CSS Registration Effective Date and UK Link Registration Effective Date is less than or equal to the value defined in the REC Schedule (currently 1,200kWh or less) then the adjustment shall not be undertaken, nor shall any future adjustment for this reason for the period for this Supply Meter Point.
- **Further details from the ROM Request:** For the avoidance of doubt, Meter Readings may be replaced following the Materiality Test being conducted, but any such Replacement Readings will not be factored into the Materiality Test nor amend the result of a previous Materiality Test, nor amend any Adjustment undertaken for this reason. This means that any Replacement Readings must be accepted by the CDSP prior to this point in order to be considered for the Materiality Test and Adjustment.

**ROM Response**

1. XRN5535 Part B To Be process:
  - a) Source required input information from UKLINK (a new automatic data extract process).
  - b) Use a new (business developed) offline tool, using the source required data, to calculate the invoice adjustment (manual).
  - c) Possibly a new MS-Excel model, containing the 5535 Part B materiality rules. Where the materiality test results in an adjustment being required:
    - i. Communicate out invoice adjustment details (manual). Please note that this adjustment will be a ONE-OFF and will not be revisited at any point in the future.
    - ii. Communicate outcome of materiality test (manual) to the Shipper(s).
  - d) Where the materiality test results in an adjustment NOT being required then the CDSP will communicate outcome of materiality test (manual) to the Shipper(s)
  - e) Subject to the assumption that the ongoing frequency of 'missing messages' will continue to remain low (see Assumption A2), then this To Be operational process can continue to remain manual.
2. **Risk.** If the situation ever arises that a large number of 'missing messages' happen (and therefore, a large number of invoice adjustments), then this will have to be dealt with as a Service Desk incident, separate to the established 5535 Part A BAU process.

**Reporting.**

Please note, any specific requests for development of automated reporting to support CSS Recorded Shipper, if required longer term, are not considered under this Modification but can be dealt with separately under a DPM Conditionality Request change, on a case-by-case basis. Based on this, it is not included within the scope of this ROM.

**ROM Response**

1. No requirement from Modification 0836S.

UK Link Component Systems	Level of Impact (L/M/H)	File Format (Y/N)	Screens (Y/N)	Reporting (Y/N)	Batch Jobs (Y/N)	Validation (Y/N)	Processes (Y/N)	Other
UK Link Gemini	N	N	N	N	N	N	N	<i>If 'Other' is ticked, please provide justification</i>
UK Link System Application (e.g. SAP ISU, BW, PO)	M	N	Y (internal screen)	Y (internal report)	N	N	N	Automatic source data extract for manual inv. adj.
UK Link Portal	N	N	N	N	N	N	N	<i>As above</i>
UK Link Online Services	N	N	N	N	N	N	N	<i>As above</i>
Contact Management Service (CMS)	N	N	N	N	N	N	N	<i>As above</i>
UK Link Network (Inclusive of IX, EFT and AMT)	N	N	N	N	N	N	N	<i>As above</i>

Additional Systems	Level of Impact (L/M/H)	File Format (Y/N)	Screens (Y/N)	Reporting (Y/N)	Batch Jobs (Y/N)	Validation (Y/N)	Processes (Y/N)	Other
Data Discovery Platform (DDP) Core	N	N	N	N	N	N	N	<i>If 'Other' is ticked, please provide justification</i>
Discovery API	N	N	N	N	N	N	N	<i>As above</i>
Reporting	N	N	N	N	N	N	N	
Gas Enquiry Service (GES) – To be included post CSS implementation	N	N	N	N	N	N	N	

### 3c. High level costs and timescales

Costs provided within the ROM response are indicative and high level based on high level analysis.

Below details the high-level implementation cost range and provides an indication of any ongoing costs identified from the high-level analysis.

### **Implementation costs**

It is estimated an enduring solution may cost at least £28,000, but probably not more than £34,000,

### **Ongoing costs**

As the read insertion, notification and report extraction needs to be executed manually there will be an ongoing cost. This depends on the number of requests. Considering the volume is a lower side the annual cost will be around £5,000 to £8,000 per annum.

**This estimates a total quote range of between £33,000 to £42,000 (inclusive of ongoing costs).**

### **Timescales:**

The high-level estimate to develop and deliver this change is approximately 7 to 8 weeks and 2 weeks of PIS.

### **Validity of ROM:**

Please note, the information provided in the ROM response is an 'at a point in time' assessment which is valid for 6 months.

### **3d. Release type**

*Please provide a view on the anticipated release type this change would need to be delivered under.*

<b>Release Type</b>	<input type="checkbox"/> Ad-hoc / Stand-alone	<input checked="" type="checkbox"/> Minor
	<input type="checkbox"/> Major	

<b>Next available Release (based on the Release Type)</b>	<b>ChMC approval to Release scope</b>	<b>ChMC approval of Detailed Design</b>
<i>Minor Release – date TBD</i>	<i>TBD</i>	<i>TBD</i>

### **3e. Impact on Service Line(s)**

<b>Impact on Service Line(s)</b>	<p>XRN5535B will propose new Service Line(s) within the Service Description Table which will consider:</p> <ul style="list-style-type: none"><li>- CDSP ability to update of the Supply Point Register when it becomes aware of an inconsistency between the UKL system and CSS</li><li>- Support of Settlement processes for material adjustments – including CDSP derivation and notification of a Meter Reading for the CSS Registration Effective Date and generation of invoices, subject to materiality test.</li></ul>
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### 3f. Assumptions

- Any changes in the approach to the solution may affect the overall schedule and costs for the change.
- Costs are high level, based on high level analysis. Detailed analysis will be needed to determine the final solution which will impact both cost and schedule.
- We have assumed there will not be any Market Trials. Any costs associated to Market Trials are not included.
- The high-level analysis is based on changes to central systems and does not account for changes to customer systems as a result of any potential work.
- The high-level analysis and costs are based on current production system

## 3. Version Control

Version	Date:	Author	Status
1.0	20/07/2022	Ellie Rogers	Clean version