

Rough Order of Magnitude (ROM) Request and Response

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, 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	
Change Title	Modification 0819 Establishing/Amending a Gas Vacant Site Process (XRN 5615)
Regulatory Impact	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Regulatory Reference (if applicable)	Regulation change allocated reference and associated Code - UNC Modification 0819 .
Change Overview	<p>This change has been raised in relation to Modification 0819 - Establishing/Amending a Gas Vacant Site Process which proposes to create a new process for vacant Product Class 4 Non-Daily Metered (NDM) sites which would allow Shippers to receive commodity relief (immediately) and capacity relief (after 12 months at vacant status) for vacant sites in their ownership.</p> <p>To enter the new Vacant Site process, a Supply Meter Point (SMP) must meet the Vacant Site criteria outlined in Modification 0819 and associated guidance documentation.</p> <p>Based on the Modification Business Rules, the following needs to be assessed by the CDSP:</p> <p>Identification of Vacant SMPs:</p> <ul style="list-style-type: none"> • Create a mechanism for a Shipper User to notify the CDSP where a SMP meets the vacant criteria as set out in the Modification. Shipper to warrant criteria are met and provide confirmation of the first qualifying No Access Visit date. • Upon receipt of the notice from the Shipper User of an SMP meeting the vacant criteria, the CDSP must undertake certain validation including: <ul style="list-style-type: none"> ○ Criteria 1 - Confirm SMP is Live ○ Criteria 2 - Confirm SMP is within the requesting User's ownership ○ Criteria 3 - Confirm SMP has a Meter Installed ○ Criteria 4 - Confirm SMP is not Isolated ○ Criteria 5 - Confirm SMP is within Class 4 ONLY. (Sub criteria 5a) Annually (or) Monthly Read (MRF), 5b)

Small Supply Point (SSP) (or) Large Supply Point (LSP) and 5c) Independent Gas Transporter (IGT) (or) Gas Transporter (GT) automatically apply if an SMP is Class 4.)

- Confirm that **no** actual meter reads have been submitted by a Shipper **between the date of the first qualifying No Access Visit** (as confirmed by the Shipper in their vacant SMP request) **and up to and including the date the vacant site request is received.**
- Further vacant site criteria which the CDSP **are not able to validate** are outlined in the Vacant Site Guidance document. For the avoidance of doubt, the CDSP does not need to validate:
 - Sub-Criteria 5d - Standard Meter (DUMB) or Non-Active AMR Meter or SMETS Meter with a Non-Active DCC Flag
 - Criteria 6 - Site is Unoccupied
 - a. Property is not currently being used as a dwelling
 - b. Property is not currently being used as a place of business.
 - Criteria 7 - No Access to Site
 - a. Shipper authorised representative is unable to gain access to the property to read the meter*
 - b. Shipper is unable to contact the Customer for meter readings
 - c. Customer has not provided meter readings
- The Shipper User **must** warrant that **ALL** vacant site criteria are true for their SMP before it can be submitted to the CDSP as vacant.
- IGT sites are in scope of the 0819 process BUT there are no changes proposed to IGT specific charges.
- Create a mechanism to identify an SMP as Vacant, which will be applied to sites which meet the criteria.
- Create a mechanism to notify the Shipper their vacant status request has been accepted or denied.
- The owning Shipper, and the DNO where the vacant SMPs are located, should be able to see the vacant sites within their portfolio.
- A mechanism to notify IGTs that a site within their network is vacant **may be** required. To be determined in detailed design. For the avoidance of doubt, the cost range in this ROM does not include the mechanism to notify IGTs.

Settlement, Commodity and Performance relief:

- Where an SMP is identified as Vacant, the CDSP must ensure the Shipper User receives settlement, commodity and performance relief from the Vacant effective date.
- Settlement, Commodity and Performance relief means:
 - Meter Read Obligations (TPD M5.9) and Must Read Process (TPD M5.10) must cease to apply.
 - NDM Supply Meter Point Demand must cease. (For the avoidance of doubt, if any gas is offtaken despite the vacant status, the owning Shipper is still responsible for the gas off taken from the vacant SMP).
 - Commodity, daily allocation and UIG costs must cease to apply.
 - Vacant Sites must be removed from all performance reporting in a similar vein to Isolated Sites.
 - For the avoidance of doubt, any retrospective cases are out of scope.

Capacity relief:

- A new Vacant Site 'eligible cause' (AQ reason code) must be created so that the Shipper User for a vacant SMP can request that an AQ be set to 1 when the SMP has been part of the Vacant Site process **for 12 or more months** in the **same** Shipper and Supplier's ownership.
- Please note that if winter consumption is applied to the vacant SMP, the Shipper will need to reduce their winter consumption before reducing the AQ down to 1 as per existing processes.
- This Vacant Site AQ reason code could also be utilised by the Shipper User to increase the AQ from 1 once it becomes clear the site is no longer vacant.
- As part of detailed design, whether one or two Vacant Site AQ correction codes would be needed, should be determined.
- For the avoidance of doubt, capacity relief means zero charge and should be effective from the new AQ of 1 effective date.

Monitoring and exit process:

- CDSP to monitor sites in the Vacant Site process so that if one of the exit criteria (outlined in Modification 0819)

is triggered, the site moves out of the Vacant Site process.

- Exit criteria is:
 - 1) Change of Shipper or Supplier event is accepted (including as a result of Supplier of Last Resort (SoLR) event)
 - 2) An AQ Correction has been submitted **except when the AQ Correction reduces the AQ down to 1**. Any of the AQ correction codes can be used to increase a vacant site AQ as long as the existing validation criteria are met.
 - 3) Class Change is submitted
 - 4) Request for Isolation is made
 - 5) Read relevant to the period of vacancy is submitted into UK Link
 - 6) ONJOB is submitted into UK Link
- For the avoidance of doubt, exit criteria 2, 3, 4, 5 and 6 **must** trigger the exit process on **submission** and do not need to have been accepted or processed centrally.
- If an exit criteria is triggered:
 - Vacant sites **only** receiving **settlement, commodity and performance relief** to have the Vacant 'status' immediately removed by the CDSP when exit criteria triggered. Settlement, commodity and performance charges and obligations (as defined above) to recommence immediately from vacant status removal date.
 - Vacant sites receiving **both settlement, commodity and performance relief AND capacity relief (due to AQ of 1)** require an AQ amendment to increase the AQ from 1 prior to exiting the process. This must be done within the timeframe outlined in Business Rule 7 in Modification 0819. The Vacant 'status' is to be removed by the CDSP on the new AQ effective date. From that point settlement, commodity, performance and capacity charges and obligations must recommence.
- The CDSP must monitor if the Shipper User submits an AQ amendment **by M-15** the following month after the exit criteria is triggered.
- If the Shipper does not raise an AQ amendment within this timescale, the CDSP must reinstate the pre-vacant Rolling AQ and Formula Year AQ. For the avoidance of doubt, the reinstated pre-vacant AQ will be subject to

	<p>existing AQ correction backstop rules. See Business rule 7b).</p> <ul style="list-style-type: none"> All AQ amendments will always be effective in line with the existing AQ amendment timelines. No changes to the AQ amendment timeline expected. Where the CDSP reinstates the pre-Vacant Rolling and FYAQ between the months of January – March, the reinstated value must be utilised to set the FYAQ for the next 12 months commencing in April. <p>PARR report:</p> <ul style="list-style-type: none"> To create a new PARR report for the Vacant Sites process based on PAC’s criteria. A first draft of what the PARR reports may look like can be found in Appendix 1 subject to PAC approval. <p>Data Discovery Platform: (Optional)</p> <ul style="list-style-type: none"> The proposer has indicated that it would be beneficial to see vacant site data in the Data Discovery Platform similar to that available for Isolated sites. We anticipate this data will need to be available in DDP for DNOs and Shippers. Please consider this in the ROM response. 	
Date Raised	20/07/2023	
Required Response Date	16/08/2023	
Requestor Contact Details	Name:	Kathryn Adeseye on behalf of the 0819 Workgroup
	Organisation:	Xoserve Limited
	Email:	kathryn.adeseye3@xoserve.com
	Number:	0121 2292351
Xoserve Lead Contact (to be provided by the CDSP)	Contact Name:	Kathryn Adeseye
	Contact Email:	kathryn.adeseye3@xoserve.com

3. ROM Response – To be completed by the CDSP

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

Please note, all the sections within this template should be populated by the CDSP when providing a ROM response.

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 checked="" type="checkbox"/> Distribution Network Operator
	<input type="checkbox"/> NG Transmission	<input checked="" type="checkbox"/> IGT
	<input type="checkbox"/> All	<input type="checkbox"/> Other <Please provide details here>
Justification for Customer Class(es) selection	<p>This change will allow Shippers for Product Class 4 Non-Daily Metered (NDM) Supply Meter Points (SMPs) to apply a vacant status to unoccupied sites in their ownership allowing them to access commodity relief (immediately) and capacity relief (after one year).</p> <p>Distribution Network Operators and IGTs are also considered impacted parties as the outcome of a site going into vacant status could impact the AQ of a SMP in their network area. For DNOs, if a site goes into vacant status, this will impact Commodity charges.</p>	

3b. Overview of impacts

Overview of impacts	<p><i>The high-level analysis has been undertaken and a potential way to implement a solution has been identified that could result in changes to the Contact Management System (CMS) or the Information Exchange (IX), UK Link, the Gas Enquiry System (GES) Online Portal and the Data Discovery Platform (DDP) systems.</i></p>
	<p><i>At a high level, the following is an assumed solution based on the information contained within this ROM request.</i></p>
	<p>New CMS contact (Approach Variant)</p> <ol style="list-style-type: none"> 1. A new 'Gas Vacant Site' (GVS) contact type would be introduced into CMS. This will be used by Shippers to request a specific Supply Meter Point (SMP) is classified a GVS.

2. *On receipt, the request will be validated by CMS.*
3. *Where the validations are successful, the submitting party will be notified.*
4. *A new CMS to UK Link interface will be created to update a GVS flag in UK Link.*
5. *Where the removal of the GVS status has been triggered by exit criteria being met, a notification will be issued to the relevant Shipper via CMS.*
6. *Changes to the Bulk Contact Logging file format to allow upload of multiple records via the UI and IX*

New File Format via IX (Approach Variant)

7. *A new request type would be introduced via a new file record through the IX route, so Shippers can specify a that Supply Meter Point (SMP) is warranted as a GVS.*
8. *The submitting party will be notified via IX of success or rejection.*
9. *Where the removal of the GVS status has been triggered by MOD0819 exit criteria being met, a notification will be issued to the relevant Shipper via IX.*

UK Link changes

Changed would be required to UK Link to receive the GVS data via IX file to UK Link, perform the necessary entry criteria validations, perform the necessary UK Link set-ups, perform the charging reliefs, and perform the monitoring and actions for exit criteria, in support of MOD0819 business rules. This would be done as follows:

10. *Upon a GVS request being received from a Shipper, the request will undergo **entry criteria** validations as per MOD0819.*
11. *Exclude validations which the CDSP is not able to perform as per MOD0819.*
12. *On success, a new GVS flag will be set in UK Link against the SMP with an Vacant Effective Date.*
13. *UK Link to action **Settlement, Commodity and Performance reliefs** as per MOD0819.*
 - a. *Cease **Settlement** charges by controlling AQ values to GEMINI for a GVS.*
 - b. *Cease **Commodity** calculations and invoicing for a GVS.*
 - c. *Cease **Performance** obligations by preventing GVSs from entering performance processes (e.g. Must read and read performance).*

14. UK Link to action **Capacity relief** via Shipper requesting an Annual Quantity (AQ) reset to 1. This means a zero charge with effect from the new AQ of 1 effective date as per MOD0819.

15. **Monitoring** for GVS against **exit criteria** as per MOD0819.

16. Amendment to portfolio reports for networks to now include GVS information.

GES changes:

17. Should any change, or enhancement, to GES be required this would need to be addressed via a Retail Energy Code (REC) change request.

DDP

Data visualisation considerations

18. Create a new PARR report in PAFA / PAC dashboards.

19. Updates to Distribution Network (DN) invoicing and forecasting (e.g., Capacity charge views), and the Shipper portfolio areas of DDP.

20. Availability of GVS information to Shippers and DNs

Consequential changes to existing dashboards

21. Update to existing Shipper Read Performance dashboards to exclude GVS.

22. Update to existing PAFA Read Performance dashboards to exclude GVS.

ASSUMPTIONS:

UK Link

23. Assignment of GVS status cannot be retrospective.

24. Once the request is received to UK Link successfully, then commodity cessation will happen from the request processing date +1 calendar day.

25. No GEMINI impact, including allocations and UIG, will be caused by cessation of charges via Shipper setting the AQ value.

26. A REC change request will be required for GES change/s.

27. Both accepted/rejected transactions listed in the exit criteria will be considered for exit from gas vacant site set up. Requests should be received from the existing shipper, if the request is from any other shipper and transaction rejected it does not qualify for exit.

DDP

28. DDP delivery is within an existing scheduled release. If an additional release is required, then the delivery costs may increase.



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/A	N	N	N	N	N	N	
UK Link System Application (e.g. SAP ISU, BW, PO)	H	Y	Y	Y	Y	Y	Y	
UK Link Portal	N/A	N	N	N	N	N	N	
UK Link Online Services	N/A	N	N	N	N	N	N	
Contact Management Service (CMS)	M	Y	Y	Y	Y	Y	Y	
UK Link Network (Inclusive of IX, EFT and AMT)	M	Y	N	N	Y	Y	Y	

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	H	N	Y	Y	N	N	N	PAFA/PAC reporting

Reporting	M	N	N	Y	N	Y	Y	
Gas Enquiry Service (GES)	N/A	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

An enduring solution will cost at least **£230,000**, but probably not more than **£655,000** dependent upon approach variant.

Ongoing costs

CMS – No ongoing costs anticipated at this stage however, this will be assessed and confirmed in detailed analysis / design phase.

GES – No ongoing costs anticipated at this stage however, this will be assessed and confirmed in detailed analysis / design phase.

DDP – No run cost increases are currently anticipated for this change.

UK Link – No ongoing costs anticipated at this stage however, this will be assessed and confirmed in detailed analysis / design phase.

Timescales:

*The high-level estimate to develop and deliver this change is approximately **24 - 28 weeks post Detailed Design Change Pack approval, and fitting into a scheduled release of DDP, and subject to six months+ industry file format change notification period, and 4 weeks of Post Implementation Support** would be recommended.*

The high-level estimate to develop and deliver this change, however, is proposed to align to the timescale of the Major Release the change is scoped into.

Validity of ROM:

Please note, the information provided in the ROM response is an 'at a point in time' assessment which is valid for **six months** from the Required Response Date.

3d. Release type

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

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

Next available Release (based on the Release Type)	ChMC approval to Release scope	ChMC approval of Detailed Design
Nov 24/Feb 25 (subject to solution/BER approval)	Feb 2024	Apr 2024

3e. Impact on Service Line(s)

Impact on Service Line(s)	<p><i>This change proposes the introduction of a new process to identify and manage vacant sites. From an initial consideration of the DSC Service Line impact, the Service Area(s) which these processes could come under are currently unknown.</i></p> <p><i>There will be new Service Line(s) required to reflect the new processes. These will be created and approved as part of the DSC change process.</i></p> <p><i>For the purpose of discussion within the Modification Workgroup, possible Service Areas the services associated to this proposal could come under have been proposed below.</i></p> <ul style="list-style-type: none"><i>Service Area 3 – Manage updates to customer portfolio (90% Shipper and 10% DNO)</i><i>Service Area 10 – Invoicing Customers (12% NGT, 88% DNO)</i><i>Service Area 2 – Monthly AQ Processes (100% Shipper)</i> <p><i>Please note, this is for discussion only and to seek views from the WG to support later discussions within the DSC change process. In terms of</i></p>
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agreeing Service Areas and funding splits, this will be undertaken at the DSC Change Management Committee (ChMC).

Please note, the funding split as per the Budget and Charging Methodology has been provided with the Service Areas however, the funding split can be proposed as something different when a specific change is raised based on impacted and benefitting parties.

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 actual solution which will impact both cost and schedule.*
- 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/s.*

29. Template Version Control

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

Appendix 1

Proposed Format of PARR Reports to support UNC Modification 0819 (Establishing/Amending a Gas Vacant Site Process)

Schedule 2A – Industry Peer Comparison View

Report Title	Class 4 Vacant Sites
Report Reference	PARR Schedule 2A.x
Report Purpose	Use of the Vacant indicator removes a meter point from the daily gas allocation process (including assignment of UIG). The report shows the number of Class 4 meter points which have been updated to Vacant in the previous month, the total number of Vacant sites and an age breakdown of how long those sites have been flagged as vacant.
Expected Interpretation of the report results	The report should help to identify any Shippers which have a disproportionate proportion of their Class 4 portfolio flagged as Vacant.
Report Structure (actual report headings & description of each heading)	Month Peer Comparison Identifier Count of sites updated to Vacant in the month Count of Vacant sites at the end of the month Percentage of each Shipper's Class 4 portfolio flagged as Vacant split into three age bands Industry Totals and Average percentages
Data inputs to the report	New Vacant sites Total count of vacant sites Date first set to Vacant Total Shipper Class 4 portfolio (count of meter points) Peer Comparison Identifiers
Number rounding convention	Percentages to 2 decimal places Counts in whole numbers
History (e.g. report builds month on month)	Monthly report plus 11 previous months for comparison
Rules governing treatment of data inputs (actual formula/specification to prepare the report)	Only Class 4 sites are considered. All updates to Class 4 within the month are included. Month end position is only for sites remaining in the Shipper's portfolio at the end of the month.
Frequency of the report	Monthly
Sort criteria (alphabetical ascending etc.)	Peer Comparison Identifier Alphabetically
History/background	Report introduced to support implementation of UNC Modification 0819 (Establishing/Amending a Gas Vacant Site Process)
Relevant UNC obligations and performance standards	Awaiting Final Legal Text

Report Example:

<i>Sites set to Vacant within the month</i>					
<i>Peer Comparison Identifier</i>	<i>Month x</i>	<i>Month x+1</i>	<i>Month x+2</i>	<i>etc</i>	<i>Month x + 11</i>
<i>ABC</i>	x	x	x	x	x
<i>DEF</i>	x	x	x	x	x
<i>Etc</i>	x	x	x	x	x
<i>Total</i>	x	x	x	x	x

<i>Proportion of sites set as Vacant at the end of each Month</i>							
<i>Peer Comparison Identifier</i>	<i>Month</i>			<i>Month +1</i>			<i>Etc. to Month +11</i>
	<i>0-6 M</i>	<i>7-12 M</i>	<i>>12 M</i>	<i>0-6 M</i>	<i>7-12 M</i>	<i>>12 M</i>	
<i>ABC</i>	%	%	%	%	%	%	
<i>DEF</i>	%	%	%	%	%	%	
<i>Etc</i>	%	%	%	%	%	%	
<i>Industry Total</i>	%	%	%	%	%	%	

Schedule 2B – Performance Assurance Committee View

<i>Report Title</i>	Class 4 Vacant Sites
<i>Report Reference</i>	PARR Schedule 2B.x
<i>Report Purpose</i>	Use of the Vacant indicator removes a meter point from the daily gas allocation process (including assignment of UIG). The report shows the number of Class 4 meter points which have been updated to Vacant in the previous month, the total number of Vacant sites and an age breakdown of how long those sites have been flagged as vacant.
<i>Expected Interpretation of the report results</i>	The report should help to identify any Shippers which have a disproportionate proportion of their Class 4 portfolio flagged as Vacant.
<i>Report Structure (actual report headings & description of each heading)</i>	Month Shipper Short Code Count of sites updated to Vacant in the month Count of Vacant sites at the end of the month Percentage of each Shipper's Class 4 portfolio flagged as Vacant split into three age bands Industry Totals and Average percentages
<i>Data inputs to the report</i>	New Vacant sites Total count of vacant sites Date first set to Vacant Total Shipper Class 4 portfolio (count of meter points)
<i>Number rounding convention</i>	Percentages to 2 decimal places Counts in whole numbers
<i>History (e.g. report builds month on month)</i>	Monthly report plus 11 previous months for comparison
<i>Rules governing treatment of data inputs (actual formula/specification to prepare the report)</i>	Only Class 4 sites are considered. All updates to Class 4 within the month are included. Month end position is only for sites remaining in the Shipper's portfolio at the end of the month.
<i>Frequency of the report</i>	Monthly
<i>Sort criteria (alphabetical ascending etc.)</i>	Shipper Shortcode Alphabetically
<i>History/background</i>	Report introduced to support implementation of UNC Modification 0819 (Establishing/Amending a Gas Vacant Site Process)
<i>Relevant UNC obligations and performance standards</i>	Awaiting Final Legal Text

Example Report:

<i>Sites set to Vacant within the month</i>					
<i>Shipper Shortcode</i>	<i>Month x</i>	<i>Month x+1</i>	<i>Month x+2</i>	<i>etc</i>	<i>Month x + 11</i>
<i>ABC</i>	x	x	x	x	x
<i>DEF</i>	x	x	x	x	x
<i>Etc</i>	x	x	x	x	x
<i>Total</i>	x	x	x	x	x

<i>Proportion of sites set as Vacant at the end of each Month</i>							
<i>Shipper Shortcode</i>	<i>Month</i>			<i>Month +1</i>			<i>Etc. to Month +11</i>
	<i>0-6 M</i>	<i>7-12 M</i>	<i>>12 M</i>	<i>0-6 M</i>	<i>7-12 M</i>	<i>>12 M</i>	
<i>ABC</i>	%	%	%	%	%	%	
<i>DEF</i>	%	%	%	%	%	%	
<i>Etc</i>	%	%	%	%	%	%	
<i>Industry Total</i>	%	%	%	%	%	%	