

Market Facilitator Workshop 1 Digital Meeting Etiquette

- Welcome to the Market Facilitator Workshop 1 – we'll start shortly
- We encourage attendees to **use video**, where bandwidth allows, especially if talking
- **Mute when not speaking:**
 - Minimise background noise to maintain focus
 - use Teams chat if you can't break through
- Stay on topic: Keep contributions relevant to the agenda
- Respect all perspectives: Foster a collaborative and inclusive environment
- We will be inviting you to provide views via <https://www.slido.com/> and open discussion
- This session will be recorded

Slido Guidance

- We would love to gather your thoughts using Slido as we move through today's session. We hope this is an engaging experience.
- Everyone should be able to vote and answer questions live during the workshop using Slido

Requirements:

- Internet access
- Web browser
- Participants can join at slido.com with **#1409796**

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E L E X O N

**Market Facilitator – Enduring
Governance Arrangements**

Stakeholder Workshop #1

27 November 2024

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Elexon Team

The Elexon team delivering these workshops will change and grow as we recruit to deliver Market Facilitator, but for now we are ...



Lawrence Jones

Head of Rules
Management



John Lucas

Head of Market
Design



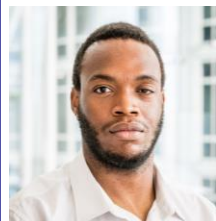
Anshu Choudhary

Senior Change Lead



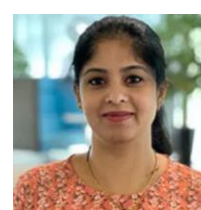
Iain Nicoll

Wholesale Market
Design Manager



Ayo Bammeke

Senior Change Lead



**Rashmi
Radhakrishnan**

Market Design Advisor

Agenda

Item	Lead
Introduction and Context	Lawrence - Chair
Workshop Approach & Objectives	Ayo – Secretary
Scope of Enduring Governance Arrangements	Iain / Rashmi - SME
Scope of Activities & Deliverables to Transition from Open Networks	John – SME
How should we engage with stakeholders during the transition period?	John
Wrap up and next steps	Lawrence

INTRODUCTION & CONTEXT

What is the Market Facilitator?

Purpose

A single expert entity responsible for fostering and managing local flexibility markets. Responsible for standardising DSO markets and driving alignment between DSO and NESO flexibility markets.

Enduring Objectives

In line with Ofgem and DESNZ's flexibility policy, make it easier for flexibility service providers to access and participate in NESO and DSO markets, including by:

- Identifying and removing barriers to market entry & participation
- Streamlining and standardising flexibility market arrangements
- Unlocking revenue stacking

Core Responsibilities

- **Strategic Leadership:** Translating regulatory visions into actionable plans, monitoring policy and market trends, and advising on regulatory improvements.
- **Market Coordination:** Establishing and managing transparent processes, rules, and standards, and facilitating stakeholder engagement.
- **Implementation Monitoring:** Ensuring compliance with established processes and standards, assessing practical outcomes, and maintaining a feedback loop for continuous improvement.

Scope of Market Facilitator

In Scope

Markets

- NESO: constraint management, reserve, frequency response, within day flexibility
- DSO: all 5 services (and future iterations / variants)

Activities

- Standardise DSO processes (full end-to-end flex delivery)
- Align NESO-DSO processes (full end-to-end flex delivery)

Timeframe

- MF role is not time limited, but scope could evolve over time

MF Powers

- Where consensus cannot be reached on a process, rule etc the MF will be empowered to make the ultimate decision

Technologies

- Not technology specific

Other

- ANM

Out of Scope

Markets

- CM, wholesale and balancing mechanism – not in scope in the 1st instance but open for reconsideration further down the line

Activities

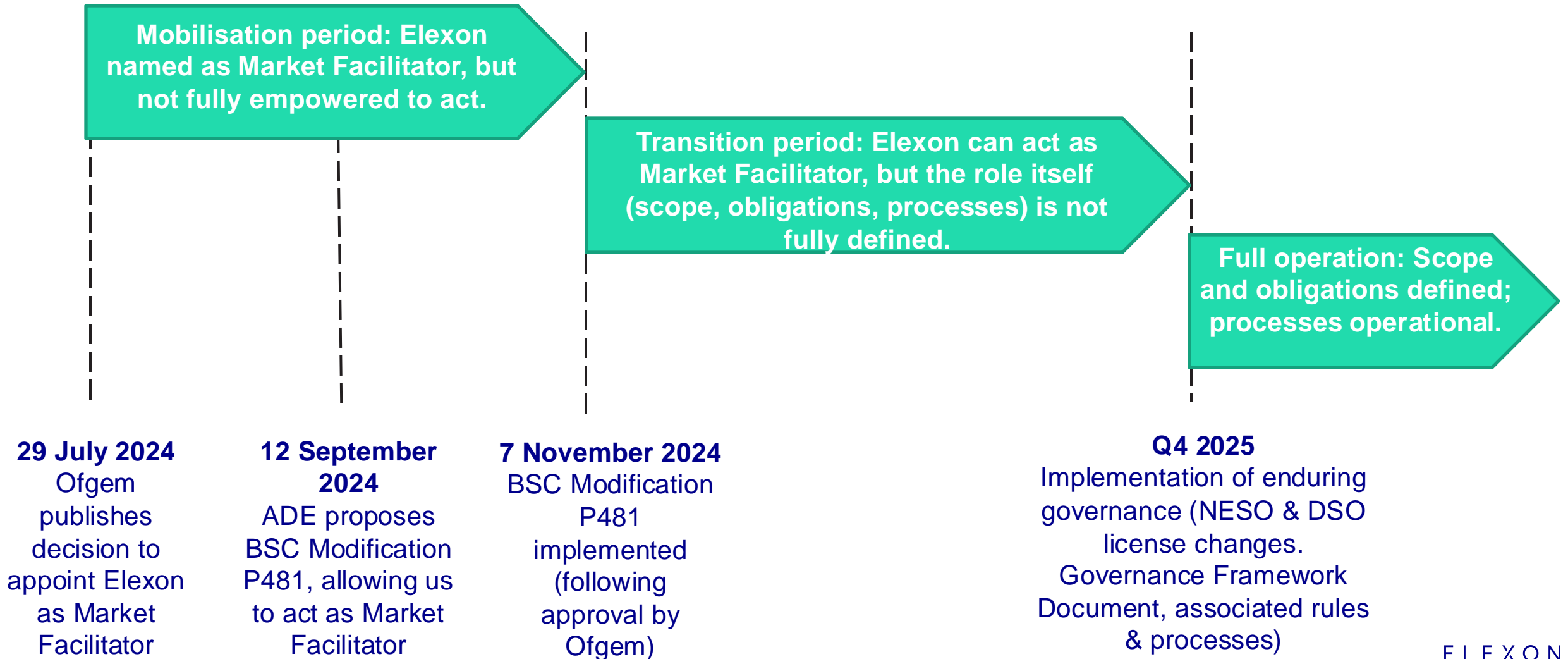
- Compliance and enforcement
- Creating flex vision & strategy
- Real time operations
- End-to-end flexibility service delivery (the activities themselves)

MF Powers

- No direct powers over NESO or DNOs – however DNOs and NESO required to adopt outputs specified by MF
- No compliance and enforcement powers - remains with Ofgem

High-Level Timeline

Exelon has been appointed as Market Facilitator, but the rules and processes governing the role are not yet fully developed:



Roles of Ofgem and Elexon during the transition period

- Ofgem are due to consult on its Market Facilitator Policy Framework, which was subject to a series of workshops between August and October, in early December 2024
- We understand a decision on the proposals in the consultation will be made in Spring 2025
- We are using the latest position from Ofgem as the basis to develop the next level of detail
- We are continuing to work with Ofgem on the detailed design and Ofgem will be attending our design workshops
- Should the Ofgem design change from its current position, we will amend, where necessary, our design to ensure they remain aligned with the Ofgem policy and design intent
- Our design will be subject to consultation and Ofgem approval, ensuring alignment to Ofgem policy

What are we planning to do during the transition period?

Key work streams during the transition period:

Upskilling

Elexon acquires deeper understanding of blockers to flexibility (e.g. through recruitment and stakeholder engagement).

Detailed Design

Elexon develops the enduring governance arrangements, via these workshops and consultation. The design is submitted to Ofgem for approval.

Implementation

Raise an enduring BSC Modification and translates the design to MF documents that DSOs/NESO will be required to comply with (via its licence)

ENA Transition

Smooth handover of relevant activities and deliverables from Open Networks (without losing momentum)

FMAR Design

Design workshops for Flexibility Market Asset Register (FMAR).
We see benefits in MF delivering FMAR also, but Ofgem has not yet decided on a delivery body.

These work streams were set out in Ofgem's MF decision.

This work stream is subject to a separate consultation on FMAR.

Elexon's objectives during the transitional period

We are currently working towards the transitional objectives proposed by Ofgem at their workshop on 29 August:

Undertake all necessary work to prepare for a Market Facilitator go-live by end of 2025 including, through:

- Supporting Ofgem in designing the Market Facilitator role
- Leading the required BSC changes to set-up the Market Facilitator role
- Working collaboratively with industry to agree any required aspects of the Market Facilitator arrangements (e.g. day 1 priorities, processes, outputs, etc)

Deliver a smooth transition from current arrangements without any loss in momentum by:

- Working with Open Networks to take over key workstreams
- Start taking on the Market Facilitator role over the course of 2025

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Does the way we've described the introduction and context seem right to you?

Should we be thinking about things in a different way?

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WORKSHOP APPROACH & OBJECTIVES

Why are we holding workshops?

This is the first of 6 or 7 workshops, which we plan to run through to March 2025

In this initial workshop we will be discussing the scope of our work in both:

- Detailed design i.e. developing the detail of the required Market Facilitator operating model
- Transition from Open Networks
- Our expectation (subject to feedback today) is that future workshops will focus on detailed design (with transition not needing further industry workshops at this stage)
- We expect future workshops will each focus on a particular area of detailed design (allowing stakeholders to prioritise which to attend if necessary)
- We will firm up timing and subject matter for future workshops after reflecting on any feedback received today

Approach to workshops

Although some of the proposals from these workshops could end up informing a second BSC Modification Proposal, we are **not** running these workshops under BSC governance (e.g. as a BSC Issue Group)

This is because their scope is broader than any BSC Modification, and the machinery of BSC governance (e.g. Applicable BSC Objectives) is not relevant

In general our approach will be to:

- Circulate material 3-5 WD in advance
- Put forward specific proposals for workshop participants to discuss and improve (rather than expecting them to start with a blank sheet of paper)
- Take on board any guidance or directions Ofgem issue before, during or after the workshops (recognizing that Ofgem's approach to this was discussed at their workshop on 2 October, and has not necessarily been decided)

Objectives for today's workshops

From this workshop we hope to obtain your feedback on the scope and approach for two key work streams:

- Detailed Design
- Transition from ENA

We are also looking for feedback on how we continue to engage with you during the transition period.

We won't be saying much about:

- **Implementation work stream:** the first phase (Modification P481) is complete, the second phase won't begin until more progress has been made on detailed design
- **FMAR Design:** subject to conclusion of Ofgem's FMAR consultation



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**Any questions or comments
on our approach to
workshops or today's
objectives?**

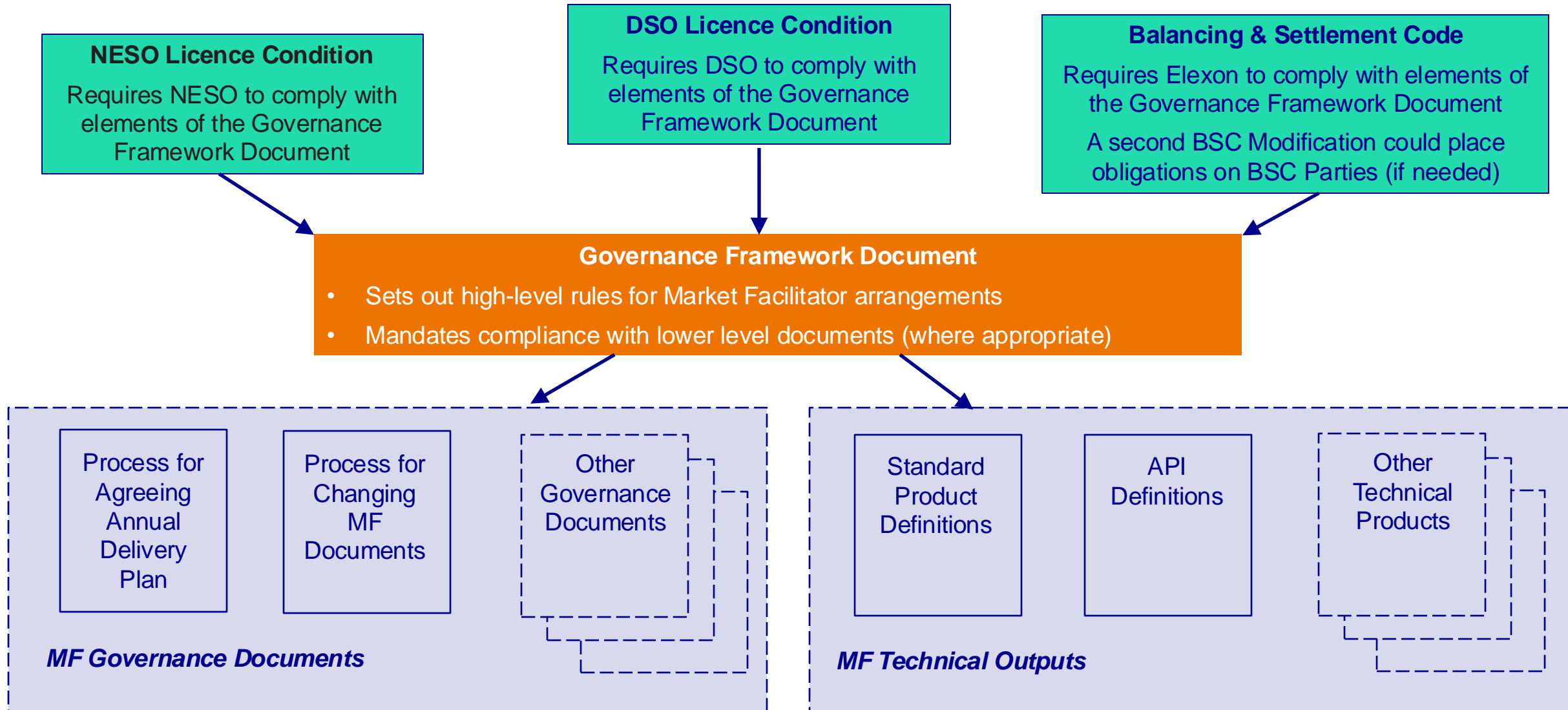
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SCOPE OF ENDURING GOVERNANCE ARRANGEMENTS

What do we mean by ‘enduring governance arrangements’?

- Before Market Facilitator becomes operational, the rules and obligations on all parties must to be clearly set out (in new and/or existing documents).
- These will be ‘enduring’ arrangements (as opposed to the less formal ‘transitional’ arrangements we’ll be operating in 2025)
- The enduring arrangements are not fixed – they will include processes for proposing and agreeing changes.
- The structure of the document set containing the rules and obligations is not yet decided - it’s subject to stakeholder input and Ofgem decision
- Purely for illustrative purposes – and to minimise the risk Elexon end up talking at cross-purposes -- the next slide illustrates one possible model for the governance framework
- It is just one of several possible models, and does not represent an agreed position (or even a firm proposal)..

One possible model for the document set implementing enduring governance arrangements



Topics currently out of scope for our workshop process

Our proposed workshop plan currently excludes the following, on the assumption that Ofgem is still considering them:

- Details of the new NESO and DSO Licence Conditions
- Ofgem's processes for holding Market Facilitator to account
- Details of any formal arrangements for stakeholder involvement or representation (e.g. Stakeholder Advisory Boards)

Upcoming workshops

Topic	When	Order
Clarifying Scope and Deliverables	November 2024	1
Budgeting and Finance	December 2024	2
Market Coordination Delivery Plan	January 2024	3
Enduring Change Management	February 2024	4
Implementation Monitoring	February 2024	5
Wash Up of Remaining Governance Topics)	March 2024	6
Mop up and holistic review	March 2024	7

Is this proposed order of workshops appropriate?



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Is this proposed order of workshops appropriate?

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Workshop 2: Budgeting and Finance

For workshop 2, we provisionally plan to discuss cost recovery, finance and budgeting:

Cost Recovery Model

What class(es) of party should fund Market Facilitator, and how should costs be apportioned between them?

Budget Setting Process

Ofgem's preferred model is "option 2" i.e. MF sets own budget (with stakeholders scrutinising the draft budget). How would this work in detail:

- Is the process linked to (or separate from) the existing BSC budget-setting process?
- How is the budget approved (e.g. role of Elexon Board)?
- Checks and balances (to ensure stakeholder concerns are addressed).

Finance Processes

- How often are funding parties invoiced?
- What happens if there is a shortfall because some of them don't pay?
- How are budgeted and actual costs reconciled?

Are these the right topics in relation to budgeting and finance?



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Are these the right topics in relation to budgeting and finance?

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Are there any other topics in relation to budgeting and finance that should be considered?

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Workshop 3: Market Coordination Delivery Plan

For workshop 3, we provisionally plan to discuss the process for agreeing a Delivery Plan:

Enduring Process

- What is the process for drafting, consulting on and agreeing the Delivery Plan?
- How should stakeholders engage with the process (links to the question of whether to have a Stakeholder Advisory Forum or similar)?

Year 1 Process

- Delivery Plan to encompass the period from January to December 2026 or more?
- How do we draft, consult on and agree the process for year 1 (2026), given the enduring process may not yet be agreed.
- We're open to feedback from stakeholders on whether the enduring process (Y2 onwards) should also be Jan-Dec or Apr-March

Are these the right topics in relation to delivery plan?



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Are these the right topics in relation to the annual delivery plan?

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Are there any other topics in relation to the annual delivery plan that should be considered?

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Workshop 4: Implementation Monitoring

For workshop 4, we provisionally plan to discuss the processes we'll operate to monitor NESO and DSO compliance with their obligations under the Market Facilitator Arrangements

Implementation Monitoring Metrics

What metrics should we monitor, in order to assess DSO and NESO compliance with Market Facilitator requirements.

Our assumption is that the initial metrics will not be 'set in stone', but will be subject to the change management process (like other aspects of the governance framework).

Implementation Monitoring Process

What processes should we use to monitor performance against the metrics:

- Processes for DSOs and NESO to provide data to Market Facilitator
- How do we use this data?
- What monitoring information should we publish?
- Process for identifying and assessing issues, deciding whether to refer to Ofgem

Are these the right topics in relation to implementation monitoring?



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Are these the right topics in relation to implementation monitoring?

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Are there any other topics in relation to implementation monitoring that should be considered?

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Workshop 5: Enduring Change Management

For workshop 5, we provisionally plan to discuss the enduring change process

Structure of Enduring Document Set

Which rules and processes (if any) should go into the BSC (requiring a second Modification)?

Which (if any) should go into lower-level Market Facilitator documents?

Which should go into higher-level Ofgem-owned documents (licences & governance framework document)?

Change process for Enduring Market Facilitator Governance Documents

What is the enduring process for proposing, assessing, consulting on, approving and implementing changes to Market Facilitator governance documents?

How do we engage with stakeholders throughout this process?

Change Process for Enduring Market Facilitator Technical Outputs

What is the enduring process for proposing, developing and assessing changes to technical products?

How do we engage with stakeholders throughout this process?

Are these the right topics in relation to change management?



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Are these the right topics in relation to change management?

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**Are there any other topics in
relation to change management
that should be considered?**

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Remaining Workshops

After workshop 5, we envisage one or two further workshops to:

1. Take a holistic view on how the outputs from all the other workshops fit together
2. Consider any changes that may be needed e.g. to address decisions, directions or guidance from Ofgem
3. Consider any remaining topics not covered in previous workshops, such as:

- Any changes needed to formal **BSCCo governance**?

Currently Section C of the BSC gives BSC Parties (including NESO and DSOs) certain rights over BSCCo (e.g. to call General Meetings, to vote on Binding Resolutions to remove Directors from the Board). Would any change to these arrangements be appropriate (e.g. to reflect that BSCCo decisions relating to Market Facilitator impact different constituencies)?

- Processes relating to **strategic guidance**
- Role of Market Facilitator in **innovation**: How do we mitigate the risk that Market Facilitator processes stifle innovation by DSOs and NESO? Should Market Facilitator have a role in coordinating innovation?

What happens after the workshops?

Subject to further discussion with Ofgem, we see the plan post-workshop as being:

- **April 2025:** We consult stakeholders on the detailed design of our operating model.
- **June 2025:** We submit proposals (amended to address consultation responses) to Ofgem (as per view from 2 October workshop that we should submit final operating model proposals for Ofgem to sign-off)

Once Ofgem has decided on the detailed design we can progress the remainder of the implementation work stream:

1. Progressing a second BSC Modification Proposal (if required)

Given there will already have been a consultation and Ofgem decision, we might recommend to the BSC Panel that this can be progressed straight to Report Phase Consultation

2. Drafting the Market Facilitator governance documents

We envisage another consultation on these (Autumn 2025)



Are there other aspects of the operating model we need to be thinking about?

Any other comments?



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SCOPE OF TRANSITION FROM OPEN NETWORKS

Activities moving from Open Networks to Market Facilitator

Some of the activities currently undertaken by the ENA Open Networks will fall within the scope of the Market Facilitator:

Stackability	Clarifying whether/how assets should be able to participate in different flexibility markets simultaneously.
Standardising Products	Standardisation and simplification of flexibility products across DSOs.
Standardising Agreements	Standardisation of flexibility contracts across DSOs and NESO.
Standardising Processes	Standardisation of processes across DSOs and NESO (e.g. Prequalification, Settlement, Baselining).

Activities moving from Open Networks to Market Facilitator (continued)

Interoperability

Development of technical standards and APIs to allow interoperability between DSOs, NESO, flexibility service providers and market platforms.

Primacy Rules

Development of commercial and technical rules to handle and/or prevent scenarios in which DSOs and NESO have conflicting requirements for utilization of the same asset.

Carbon Reporting

Standardisation of methodology for assessing carbon impact of flexibility (for purposes of SLC31E reporting)

Question: do these seven areas match your expectations of areas transitioning into Market Facilitator?



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Do these seven areas match your expectations of areas transitioning into Market Facilitator?



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Process for developing transition plan

Transition from ENA was discussed at the Ofgem workshop (20 August)

Attendees emphasised the importance of Elexon and ENA developing a clear transition plan, and communicating it to stakeholders

We also think it is important to obtain stakeholder input on what our priorities should be (both short-term priorities for the transition period, and medium- and long-term priorities for when the arrangements are operational)

Input received (both today and subsequently) will feed into our plan

What does this mean for ENA Technical Working Groups?

Network Operation

Primacy Rules

Dispatch Interoperability

Operational Data Sharing

Market Development

Baselining

Flexibility Products & Stackability

Standard Agreement

Pre-qualification

Settlement Process

Planning & Network Development

Carbon Reporting

DER Visibility

Common Evaluation Methodology

ANM Curtailment Information

System Forecasting (DFES)

NDP & Co-ordination Register

Key

- Currently active Working Group (to transition to MF)
- Inactive Working Group (responsibility transitioning to MF)
- Continuing under ENA (but potential interaction with MF activities)
- No MF interaction identified

This is a provisional view, subject to stakeholder feedback and ongoing discussions with the ENA.

Stackability

- This area was specifically identified by Ofgem as one of their proposed enduring objectives for Market Facilitator
- It has links to other current work e.g. BSC Issue 114 is looking at how we settle Applicable Balancing Services Volume Data (ABSVD), but that inevitably touches on bigger issues of revenue stacking for ancillary services and wholesale market volumes delivered through an independent aggregator

Link: [Settlement of ABSVD for ancillary services delivered through independent aggregators](#)

- Our understanding is that the ENA Working Group has focused on clarifying the existing rules, and identifying 'quick wins' that can be implemented to enable the core and supporting outcomes for Ofgem's new Flexibility Digital Infrastructure (FDI)

- Are there specific markets / issues where revenue stacking (or the lack thereof) is blocking the growth of flexibility markets?
- During the transition period we could potentially step back from the detail, and seek stakeholder views on the desired whole system end state for revenue stacking (and what new FDI, if any, that would need). Do you think that would be a worthwhile exercise?





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Are there specific markets / issues where revenue stacking (or the lack thereof) is blocking the growth of flexibility markets?

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During the transition period we could potentially step back from the detail, and seek stakeholder views on the desired whole system end state for revenue stacking (and what new FDI, if any, that would need). Do you think that would be a worthwhile exercise?

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Standardising Products

DSOs have aligned on five products (standardised the parameters but working on actively developing recommendations for reducing the number of variants):

Peak Reduction	Utilisation payment only
Scheduled Utilisation	Utilisation payment only
Operational Utilisation	Utilisation payment only
Operational Utilisation + Scheduled Availability	Availability and utilisation payment
Operational Utilisation + Variable Availability	Availability and utilisation payment

- Are there any particular areas where further standardisation would bring benefits?
- Should we assume that NESO products will remain different to DSO products (due to the different use cases they address)?





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**Are there any particular areas
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Should we assume that NESO products will remain different to DSO products (due to the different use cases they address)?

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Standardising Agreements

- DSOs have implemented version 3 of standard agreement (and associated service terms)
- Some issues remain e.g. concerns that standard terms are not appropriate for all sizes/types of asset

- Are there specific contractual issues that are blocking the growth of flexibility markets?





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**Are there specific contractual
issues that are blocking the
growth of flexibility markets?**

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Standardising Processes

ENA Technical Working Groups (TWG) have aligned DSO processes (and NESO processes, in some cases) across a variety of areas:

- **Prequalification:** DSOs (and market platforms) have implemented standard prequalification questions (both commercial and technical)
- **Settlement:** DSOs have standardised settlement processes
- **Baselining:** TWG have appointed consultants to identify opportunities for further standardisation
- **Products:** DSOs have made progress on aligning some of their products.

- Are there specific processes where lack of standardization is blocking the growth of flexibility markets?
- Are there specific areas where standardizing the process is not enough, and technical standards (e.g. harmonised APIs, data sharing) are needed to unblock?





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Are there specific processes where lack of standardization is blocking the growth of flexibility markets?

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Are there specific areas where standardizing the process is not enough, and technical standards (e.g. harmonised APIs, data sharing) are needed to unblock?

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Interoperability

- Current ENA work in this area focuses on dispatch (defining a common API based on OpenADR 3.0)
- They are appointing external service provider(s) to develop the standard through Q1 and Q2 2025

- What are the key areas (beyond dispatch) where lack of interoperability is blocking the growth of flexibility markets?
- Are there existing initiatives (either in GB or internationally) that could provide a basis for increasing interoperability within GB flexibility markets?





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What are the key areas (beyond dispatch) where lack of interoperability is blocking the growth of flexibility markets?

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Are there existing initiatives (either in GB or internationally) that could provide a basis for increasing interoperability within GB flexibility markets?

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Primacy Rules

Primacy rules are needed to allow efficient coordination by NESO and DSOs

The ENA has published two increments of primacy rules and now has commissioned external consultants to report on:

- Where conflicts may arise, and primacy rules that can alleviate them
- Costs and benefits of these primacy rules for all stakeholders
- Interaction with existing rights and obligations
- Information and control flows needed to implement primacy rules

More than any other area, primacy rules seems to interact with broader issues (access SCR, legacy connection agreements)

- To what extent is the growth of flexibility markets blocked by a lack of clear primacy rules (or broader issues related to access rights)?





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To what extent is the growth of flexibility markets blocked by a lack of clear primacy rules (or broader issues related to access rights)?

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Any other comments on how we approach the transition?



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What are your priority areas (for 2025 and beyond)?

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STAKEHOLDER ENGAGEMENT DURING THE TRANSITION

Stakeholder engagement – Detailed Design work stream

As already discussed, we propose to engage stakeholders in the detailed design through:

- Six or seven workshops (November 2024 to March 2025)
- Consultations on detailed design (Summer 2025) and the documents that implement it (Autumn 2025)

- Is this an appropriate level of engagement?
- Too much? Too little?



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Do you agree with this level of engagement?

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**Comments from previous question, is
this an appropriate level of
engagement?**

Too much? Too little?

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Other questions on stakeholder engagement

- How involved do you want to be in the development of the transition plan (for transferring activities from ENA)?
- Should we be consulting you formally on what we plan to do in 2025 (a 'delivery plan' for the transition period)?



Other questions on stakeholder engagement



How involved do you want to be in the development of the transition plan (for transferring activities from ENA)?



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Other questions on stakeholder engagement



Should we be consulting you formally on what we plan to do in 2025 (a 'delivery plan' for the transition period)?



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