

Connections Process Advisory Group

Meeting 6 Minutes

Date: 18/04/2024 Location: MS Teams

Participants

Attendee	Attend/Regrets	Attendee	Attend/Regrets
Merlin Hyman, Regen, CHAIR	Attend	Annette Sloan, SSENT	Attend
Neil Bennett, SSEN Transmission	Attend	Patrick Smart, RES Group	Attend
David Boyer, ENA	Attend	lan Thel, Department for Energy Security and Net Zero	Attend
Lynne Bryceland, SPT	Regrets	Spencer Thompson, INA	Attend
Matt Chatfield, Department for Energy Security and Net Zero	Attend	Matt White, UKPN	Attend
Chris Clark, Emtec Group	Attend	Lee Wilkinson, Ofgem	Attend
Daniel Clarke, NGET	Attend	Michelle Young, Scottish Government	Regrets
Catherine Cleary, Roadnight Taylor	Attend	Salvatore Zingale, Ofgem	Attend
Liam Cullen, Ofgem	Attend	Camille Gilsenan, ESO	Regrets
Arjan Geveke, EIUG	Regrets	Robyn Jenkins, ESO	Regrets
Ben Godfrey, National Grid Electricity Distribution	Attend	Laura Henry, ESO	Attend
Garth Graham, SSE Generation	Attend	Paul Mullen, ESO	Attend
Paul Hawker, Department for Energy Security and Net Zero	Regrets	James Norman, ESO	Attend
Claire Hynes, RWE	Attend	Mike Oxenham, ESO	Attend
Jade Ison, National Grid Electricity Transmission	Attend	Djaved Rostom, ESO	Attend
Allan Love, SPT	Attend	Atia Adrees, ESO	Attend
James Macauley, Ofgem	Attend	Mike Robey, ESO (Tech Sec to CPAG)	Observe
Holly Macdonald, Transmission Investment	Attend	Rachael, Eynon, ESO	Observe
Alasdair MacMillan, Ofgem	Regrets	Sabrina Gao, ESO	Observe
Deborah, MacPherson, ScottishPower Renewables	Attend	Jo Greenan, ESO	Observe
Graham Parnell, BayWa r.e.	Attend	Will Kirk-Wilson, ESO	Observe
Jennifer Pride, Welsh Government	Attend	Richard Paterson, ESO	Observe
Grant Rodgers	Attend	Sonia Poonian, ESO	Observe
Freddie Saunders, Department for Energy Security and Net Zero	Attend	Alison Price, ESO	Observe
Andrew Scott, SSE Distribution	Attend		

Agenda

1.	Welcome and introductions	Merlin Hyman, James Norman
2.	Minutes and actions from meeting 5	Mike Robey
3.	The TMO4 reformed connections process and latest implementation considerations	Mike Oxenham
4.	Package 2 recommendations	Djaved Rostom
5.	Substation bays	Laura Henry
6.	Next steps	James Norman
7.	Any Other Business	Merlin Hyman

Discussion and details

Minutes from meeting, including online meeting group text chat during meeting, where referenced as "[From online chat]"

1. Welcome and Matters arising

• The Chair welcomed everyone to the meeting and noted the focus of the agenda on TMO4+ and the return of Package 2 and substation bays to CPAG.

2. Minutes and actions from meeting 5

- A member noted that discussion at the March Connections Delivery Board meeting had noted the complexity of Gate 2 on embedded customers.
- A member provided a verbal update on the development of the Distribution Forecasted
 Transmission Capacity (DFTC) approach for the latest TMO4+ reformed connection process. The
 speed of decision making for connection applications in the new process is being worked through.
 The approach will see the DNOs providing relevant EG with an indicative connection date at Gate 1
 (in respect of Transmission impacts), and a connection date will not be confirmed until Gate 2.
- Action 6.2.1: The Strategic Connections Group to return to CPAG with a paper on the implications
 of TMO4+ for embedded customers.
- **Decision 6.2.1:** CPAG approved the meeting 5 minutes.
- Action 6.2.2: ESO to publish meeting 5 minutes.

3. The TMO4 reformed connections process and the latest implementation considerations

- ESO provided an overview of the latest reform proposal, now termed "TMO4+", highlighting key features of Gate 1, Gate 2, the end-to-end process timeline, code modification structure and next steps.
- [From online chat: a member asked whether clear criteria will be set out as to what connection modifications will be allowed at any time versus those that will be required to go via the annual window process.
 - ESO responded that this will be part of the code workgroup's scope to identify this and ESO
 has set out initial thoughts in the Code Mod (although the code modification only focuses on
 those which will need to go through the TMO4+ process and not secondary processes).

Financial Instruments

- ESO noted that the code modification being submitted does consider whether there is a financial aspect at Gate 1 and Gate 2 e.g. a capacity holding security.
- A member asked whether charges would be cost reflective, noting that if the proposal is for charges to not be cost reflective, they understood that primary legislation will be required.

- ESO noted that something like capacity holding security could be applied at Gate 2 to incentivise projects to continue progressing through milestones after achieving Gate 2.
- [From online chat: A member noted that for offshore projects at Gate 2, once a Crown Estate Agreement for Lease (AfL) has been signed, the project is liable for very high annual fees which already provide incentive to get connected as quickly as possible.]

Gate 2

- A member queried whether the approach for embedded projects is focussed on firm connection dates, rather than criteria to achieve a non-firm connection.
 - ESO suggested that this be explored more within DFTC and DNO process development.
- A member noted that the reformed process timeline shows that ESO is proposing to assess projects' achievement of Gate 2 in three batches throughout the year, rather than a continuous opportunity for projects to demonstrate they have achieved Gate 2.
 - ESO agreed and noted its initial view that the date Gate 2 criteria was achieved would be used to rank the order of projects being assessed and queue position within each Gate 2 batch.
 - A member asked how this will work for embedded projects, who will be submitting evidence to their project's DNO. Will it be the date that DNOs receive the evidence? The member stressed that this date must be used in the queue position ranking to avoid disadvantage to embedded customers.
 - Another member agreed and noted that the SCG had discussed this earlier in the week and are scheduling more meetings. They emphasised that DNOs do not want to block customers progress through the connections process.
 - Another member emphasised that from a fairness perspective the reformed approach must ensure that embedded projects are in the same assessment batch as transmission projects submitting evidence in the same time period.
 - A member supported this view and emphasised their view that the DNO approach needs to be codified to ensure that a process is in place to achieve this fairness, rather than relying on best intentions.
 - Another member agreed the need to codify the DNO requirement but highlighted that the timescale will be a real challenge to the first cycle of the new process.
 - Another member agreed that the detail was really important. They reflected that the Gate 2 approach reduces some of the benefit of DFTC. They noted the need to map evidence to the submission batches and application windows, which in some ways will be akin to three project progression cycles per year.
 - [From online chat: A member noted that the DNO queue management process is largely paused due to project progression outcome dates. They questioned whether consideration is being given to addressing the DNO queue, that in theory, will be affected by these outcomes and how this aligns with the DFTC process (or similar) for existing sites. For example, embedded projects with a 2035 project progression date will be sat and not progressing. Some of these being many years old, some are projects waiting to progress and others (many) will be purely speculative that have not had to hit any milestones (and likely can't) but have no need to due to project progression dates being far off into the future.
- [From online chat: A member noted they were unclear on how planning at distribution would work without knowing the connection date, and also what the role for Technical Limits is if the proposal was saying an offer was non-firm at Gate 2.
 - ESO stated that it was not proposing to change Technical Limits.
 - ESO noted that Gate 2 will provide a firm connection date (unless a customer specifically asks for non-firm). In terms of impact for embedded projects of not knowing connection dates before Gate 2, this is something ESO will be working through with DNOs.
 - A member noted the value of Technical Limits was DNOs being able to give customers a view of both firm and non-firm options at offer stage. Given this they felt there was a risk that the value of Technical Limits is marginalised if the connection date is left to Gate 2.]
 - o [From online chat: ESO noted that DFTC relates to Gate 1, so not an issue at Gate 2.

- Another member stated that DFTC would only be relevant for managing Gate 1 capacities.
 Gate 2 would follow these windows and would effectively require regular (3 times per year) project progressions of Gate-2 compliant embedded projects.]
- [From online chat: a member asked whether the Gate 2 submissions in a batch are also filtered by technology type and/or location as well.]
- A member raised the positioning of Gate 2 requiring a date for consent submissions, and whether queue management milestones could be used.
 - ESO reflected that this subject had been discussed a great deal and acknowledged it was important to try and get it right. They noted that there were challenges around forward-looking dates (proposed for Gate 2) and backward-looking dates (transmission queue management milestones are set backwards from the date of connection).
 - The member emphasised the importance of good communication to ensure reasonableness to customers and all stakeholders.

Transitional arrangements before go-live

• ESO noted that it was considering what transitional arrangements are necessary in 2024 before reform go-live and this has the potential to include providing lighter-touch offers until the reformed connections process goes live.

Gate 1

- A member noted that Gate 1 is open for just a few weeks for customers to apply and asked whether it would be possible for the window to open earlier for projects not wanting pre-application support.
 - ESO noted that before January 2025, the existing application process would still be open (possibly with lighter-touch offers, as referenced earlier), but that this suggestion could be considered for the Q1 2026 application window onwards.
 - The member felt this would be helpful to customers.

Existing queue

- A member raised whether a grace period would be available for existing projects in the connections queue to gather and submit their Gate 2 evidence. Will ESO be taking the same approach for existing projects as for new projects (for new projects, the date of evidence submission to ESO will determine queue position)?
 - ESO noted that for the existing queue, in the first Gate 2 assessment, ESO will use the date that the Gate 2 criteria was achieved (rather than the submission date) [addendum: to the extent required whilst noting the following points].
 - The member noted the importance for very clear rules and communication on this.
 - ESO also noted that existing projects in the queue (which had met the Gate 2 criteria) could retain their existing connection date or try and secure an accelerated connection date.
 - ESO emphasised that this is an important point and that ESO did not want to adversely affect those existing projects in the connection queue that are progressing, noting that many of the projects that have already met the Gate 2 criteria may want to stick to their existing connection date.
- A member highlighted the need to clarify the rules for the existing queue submitting Gate 2 evidence in quarter 4 of 2024 in the proposed timeline. There is likely to be a huge volume of projects wanting to get into this first process to demonstrate achievement of Gate 2. They challenged whether it was realistic for DNOs to submit the evidence submitted from embedded projects in the existing queue in time for all those customers who want to try and accelerate in the first opportunity in the new process.
 - A member agreed the need to work through the detail and noted from the previous discussion potential for confusion. They agreed there will be significant pressure to meet the deadlines for customers, network operators and ESO.
 - [From online chat: Another member raised whether DNOs would need to introduce a backoff arrangement for an earlier window for their existing customers to ensure these met the ESO Gate 2 batched assessment deadline.
 - ESO noted there is a one month competency check period after the close of the submission period which provides four weeks to process information that comes in right up to the deadline, which should help alleviate this, at least in part.
- [From online chat: A member asked whether there had been thought with respect to whether User Commitment (securities) for existing projects that are categorised at Gate 1 would still apply or

whether these would be 'cancelled' as per TMO4+ application for new applications? They flagged this issue as something for the code modifications to consider.

 ESO stated that the current expectation is that User Commitment liability / security would be removed, but agreed the need for discussion as there was a consumer risk associated with that which may be of concern so it might also end up ring-fenced in full or in part as a contingency approach if the level of consumer risk becomes unpalatable.]

Closing comments on TMO4+

- [From online chat: A member asked if ESO had tried to quantify how much this will reduce the queue. They felt that the message in the market is that the market will still try and pile into the queue.
 - ESO has estimated that TMO4+ will more than halve the current queue.
 - The member noted there may be a lag time before developers change approach.
 - ESO said it was very open to hear proposals on how to accelerate impact.
- ESO thanked CPAG members for sharing their views. They noted that the detailed considerations for these issues will now be picked up through the code modification process. ESO re-visited the big picture, that the transmission connections queue had doubled in the last year and could reach 800GW by the end of this year and therefore it was essential to reform the process and move away from the status quo. ESO emphasised that the new approach must work for all projects, both transmission and distribution-connected projects. The agenda has now moved on, with the focus on the detail of how to implement, not whether to do it.
- [From online chat: A member thanked ESO for publishing the TMO4+ summary document earlier in the week, which they noted had already been helpful for discussing impacts with wider stakeholders.]

Code Modifications

- ESO advised that it will be raising code modifications on Friday 19 April and that it will be seeking
 the urgency route, which will be subject to Ofgem granting urgency. Once published, CPAG
 members will be able to see the next level of detail ESO is proposing and the questions that ESO
 wants the workgroups to consider. The modifications will go to the CUSC and STC panels during
 week commencing 22 April.
- In addition to the workgroups established by the codes, ESO is expecting to hold some webinars to share further details.
- A member asked whether membership of the workgroups will be restricted.
 - ESO noted they are looking for joint CUSC/STC groups to deliver a holistic approach with some aspects in separate subgroups. ESO understands non-CUSC parties can be nominated and there can also be observers in the workgroups. ESO stated that it did not want to restrict engagement and that expert input to the workgroups was essential.
- A member reported that TCMF had discussed how a joint workgroup would work and that ground rules would need to be agreed for this.
- The Chair asked for details of the schedule for modifications for embedded projects.
 - Another member highlighted their view that a DCUSA modification should be aligned to these modifications and pursued in parallel if at all possible.
 - ESO advised that they were in discussion with the ENA on this point and they noted that DNOs were able to join the CUSC workgroup.
 - The SCG recognises the need for alignment and is planning to develop details on any DCUSA modifications required.
 - [From online chat: A member suggested considering inviting a member of the DCUSA code management team into CPAG for their expertise on any further applicable discussions on a DCUSA mod change and to ensure they had the big picture on connections reform.]
- A member noted that stakeholder alternative modifications are likely to be raised.
- ESO agreed that the formal code governance process allows for Workgroup Alternative CUSC Modification (WACM) to be raised. However, ESO reflected the scale of engagement over the last 18 months on developing the reform proposals and expressed its hope that this will help avoid too many WACMs. ESO expressed hope that CPAG members will encourage their members to constructively support the code modification process by only proposing WACMs that deliver holistic overall benefits under the overall TMO4+ approach.

- The Chair recorded his willingness to be involved in developing the detail and expressed his belief that CPAG members were also committed, and via their networks too.
- Action 6.3.1: ESO to submit CUSC and STC code modifications 19 April.

Government and regulator views

- DESNZ noted continued political desire to see reform as reflected in the spring budget.
- Ofgem noted its support for the proposals and proposed timescales and drew attention to its
 recently published open letter highlighting its expectations on the process and governance. Ofgem
 encouraged stakeholders to input into the modifications process. Ofgem also noted that Licence
 changes will be developed and implemented for the reforms.

Closing remarks

• The Chair urged ESO to make it easy for people to keep up to date on progress and the process.

4. Package 2

- ESO presented the updated Package 2 paper and proposed updates to key elements of network
 modelling including enabling works, fault level assumptions, the consideration of embedded projects
 and further development of construction planning assumptions (CPA), which all had previously been
 discussed at CPAG in February.
- A member raised the consideration of the implications of the proposals on charging and user commitment, querying whether a change to the enabling works approach could have an impact.
 - ESO noted that it did not envisage that charging would be impacted by the potential change to the definition of MITS substation as it is the MITS node that is used for charging purposes and there was no intention to change the definition of the MITS node. The ESO will explore this and confirm that the changes being suggested have no impact on charging.
- A member asked whether these recommendations would require a change to CUSC and if so, how
 is that going to be worked through with the Reform code mods:
 - ESO clarified that it was likely that, if any changes to the definition of a MITS substation were implemented, a code modification may be required. Further clarity on where exceptions would apply may also form part of the code modification. The ESO will confirm this.
 - The member reiterated their concern about the impact on charging. For example, what would be the impact for a 132kV-connected project, connected to a MITS substation? Will there be a change in how they're treated (or not) and what will the change be? They asked ESO to clarify the implication.
- A member proposed that further clarity should be provided to confirm that the changes being
 explored would only be applicable to the MITS substation definition rather than to a MITS node
 definition.
 - ESO agreed that it would clarify this and for the context of this paper it is referring to the MITS substation, which ESO will make clear in any further industry documents.
- A member asked ESO to elaborate on linking CPA assumptions to FES.
 - eso noted that it had an innovation project looking at how to further improve CPA modelling, considering revised battery assumptions, electrolysers operating profiles. The link to FES relates to project attrition assumptions, aligning demand across different GB regions data with FES. As FES data is also input to CSNP model, so, ESO is aiming to align CPA input with CSNP input data.
- The Chair concluded the discussion, noting that there was lots of knowledge and thinking across stakeholders that could contribute to the Package 2 proposals further.
 - ESO agreed that it wanted to engage stakeholders on this.
- Action 6.4.1: ESO to provide further clarification to CPAG on MITS definitions, and implication of potential impacts on Charging and User Commitment.

5. Substation bays

- ESO noted that the bay reallocation proposal will be updated as the 3 priorities for allocating bays following project termination on slide 18 had now been updated. Government does not intend to utilise consideration 1 (government designation). The second consideration on ESO/NESO designation will focus on 'projects critical to security of supply or system operation'. The third consideration of allocating bays to projects that expressed interest in acceleration would be a temporary approach until the Gate 2 approach is in place.
- A government representative confirmed this approach within the current timeframe and noted that DESNZ continues to run a strategic triage process for large strategic investments, with support from network companies. Longer term, the Strategic Spatial Energy Plan could be considered a decisionmaking tool, which a new more strategic stakeholder group will look into.

[From online CPAG member comments:

- A member queried the removal of consideration 1 (designation by government) within the priority projects approach expressing that it seems like a step away from with the aims of reform.
 - Another member agreed and noted that they presumed NESO would be fulfilling this role in the future.
 - A member suggested that it was a question of timing; there isn't a mechanism for this yet, but it will come later through the SSEP. They noted that Ofgem is leading work to ensure that the interim processes now being designed enable a move to a more strategic approach in the future.
 - Another noted the desire to still eventually move towards a process where strategic projects can be accelerated / prioritised, but if this was Government-led it could require primary legislation and would create substantial lobbying which could slow down progression of Connections Reform as a whole. They agreed with another member that this could be a potential role for NESO in the future.]
- For bay sharing the recommendation is to develop, agree and share a formal policy of bay sharing and that code changes may be required from this. ESO also noted that TO costs may increase.
- A member noted their support for the bay sharing proposal as presented, both the 'direct' and 'indirect' approach. They reflected the proposal feels like a really useful step to fewer new substations being triggered. and that it seems to have real potential for a holistic benefit. Another member supported this.
- A member asked whether the bay sharing approach would include reallocation to embedded projects which have been allocated to a new adjacent Grid Supply Point.
- Concluding the discussion, the Chair reflected the progress made and positive support from CPAG members. He asked for a timeline for the proposed code modifications.
 - ESO advised that the work on the policy will begin now for ESO and the TOs. The timing for code modifications is to be confirmed.
- Action 6.5.1: ESO and TOs to develop formal bay sharing policy.

6. Next steps

- The Package 2 and Substation bays papers are going to the Connections Delivery Board next week.
- The next CPAG meeting is scheduled for Thursday 09 May. The agenda is to be confirmed. Initial thoughts include:
 - The approach for embedded projects under TMO4+, with the Distribution Forecasted Transmission Capacity approach and Gate 2
 - Progress with developing the more detailed design of TMO4+
 - o Transition to go-live and the implications for connection applications in 2024.

Decisions and Actions

Decisions: Made at last meeting

ID	Description	Owner	Date
6.2.1	Meeting 5 minutes agreed	Merlin Hyman	18/04/2024

Action items: In progress and completed since last meeting

ID	Description	Owner	Due	Status	Date
6.2.1	The Strategic Connections Group to return to CPAG with a paper on the implications for embedded customers.	Ben Godfrey	09/05/2024	To confirm if May or June	
6.2.2	ESO to publish minutes of meeting 5	Mike Robey	25/04/2024	In progress	
6.3.1	ESO to submit CUSC and STC code modifications on Friday 19 April	Paul Mullen	19/04/2024	Complete	19/04/2024
6.4.1	ESO to provide further clarification to CPAG on MITS definitions, and implication of potential impacts on Charging and User Commitment.	Djaved Rostom	09/05/2024	In progress	
6.5.1	ESO and TOs to develop formal bay sharing policy	ESO, TOs		In progress	
5.4.1	ESO and DNOs to consider the revised proposals within DFTC discussion.	ESO & DNOs	25/04/2024	Ongoing	
5.5.1	DFTC to come back to CPAG to reflect how it would work if Gate 2 were applied to the whole queue.	Ben Godfrey	18/04/2024	Proposed for next CPAG agenda	
4.1.2	ESO to trial pre-recording some presentations to introduce topics in advance of the meeting.	Mike Robey	04/03/2024	ESO to trial	

Decision Log - Decisions: Previously made.

ID	Description	Owner	Date
4.2.1	Minutes of meeting 3 approved for publication	Merlin Hyman	08/02/2024
3.2.1	Minutes of meeting 2 approved for publication	Merlin Hyman	25/01/2024
2.1.1	Terms of Reference v2 approved for publication	Mike Robey	25/01/2024
2.2.1	Minutes of meeting 1 approved for publication	Mike Robey	25/01/2024

Action Item Log - Action items: Previously completed.

ID	Description	Owner	Due	Status	Date
5.2.1	ESO to publish the minutes of meeting 4	Mike Robey	21/03/2024	Complete	21/03/2024
5.3.1	The Gate 2 approach will be taken to the March CDB for their steer.	James Norman	21/03/2024	Complete	21/03/2024
5.4.2	ESO to take Package 3.1 recommendation to the March CDB meeting.	James Norman	21/03/2024	Complete	21/03/2024

Meeting minutes

ESO

5.6.1	ESO to take its disincentivising mod apps recommendation to the March CDB meeting.	James Norman	21/03/2024	Complete	21/03/2024
5.7.1	ESO to take its paper on the single digital view CAP action to CDB for their steer	Adam Towl	21/03/2024	Complete	21/03/2024
5.8.1	ESO to schedule CPAG meetings beyond April 2024	Mike Robey	28/03/2024	Complete	28/03/2024
4.1.1	ESO to look into sending papers in more than one batch, if this allows at least some to be circulated earlier.	Mike Robey	29/02/2024	Ongoing	04/03/2024
4.2.1	ESO to publish Minutes of meeting 3	Mike Robey	29/02/2024	Complete	26/02/2024
4.3.1	ESO to return to CPAG to share its updated recommendation for Package 2.	Djaved Rostom	04/04/2024	Complete	18/04/2024
4.4.1	ESO will take forward the options Packages 3.1, 4.4 and 5 for more detailed discussion.	Mike Oxenham	07/03/2024	On agenda 07 March	07/03/2024
4.6.1	ESO to return to CPAG to discuss disincentivising mod apps	Ruth Matthew	07/03/2024	On agenda 07 March	07/03/2024
3.2.1	ESO to publish the minutes of meeting 2	Mike Robey	22/02/2024	Complete	16/02/2024
3.5.1	ESO agreed to look into holding a targeted workshop on Gate 2 to gather more views	Paul Mullen	28/02/2024	Scheduled	28/02/2024
3.7.1	ESO will bring fuller details on packages 3, 4 and 5 to the next CPAG meeting, providing clear links to the Connections Action Plan	Mike Oxenham	22/02/2024	Complete	22/02/2024
3.7.2	ESO to re-issue slides to address a typo on slide 36	Mike Robey	08/02/2024	Complete	08/02/2024
2.2.1	ESO to publish Terms of Reference	Mike Robey	08/02/2024	Complete	08/02/2024
2.2.2	ESO to publish minutes of meeting 1	Mike Robey	08/02/2024	Complete	08/02/2024
2.3.1	ESO to scope code defects and bring them to a future CPAG meeting	Paul Mullen	07/03/2024	On agenda 07 March	07/03/2024
2.4.1	ESO to bring update on queue position allocation to the 08 February CPAG meeting	Paul Mullen	08/02/2024	Complete	08/02/2024
2.5.1	ESO to bring bay re-allocation and standardisation back to CPAG	Shade Popoola	22/02/2024	Complete	22/02/2024
1.2.1	ESO to circulate the updated Terms of Reference document	Mike Robey	25/01/2024	Complete	22/01/2024
1.3.1	ESO to share its analysis of the impact of CMP376 on the existing TEC queue.	Kav Patel	08/02/2024	Quarterly updates to be provided	Ongoing
1.4.1	ESO to look at how and when details of the outcome of the ongoing transmission works review can be shared	Robyn Jenkins	08/02/2024	Update shared	08/02/2024
1.4.2	Technical secretary to follow-up liaison and co- ordination with CDB	Mike Robey	25/01/2024	In place	24/01/2024
1.4.3	ESO to confirm how much detail of code mods will be taken to CPAG before going to code mod working groups.	Paul Mullen	25/01/2024	Discussed 25 January	25/01/2024