



#### Thank you for joining the September Open Networks Dissemination Forum

This meeting will commence at 10:00

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- All microphones have been set to mute to avoid background noise.
- Please ask questions or make comments via the chat function throughout the meeting.
- Please note that the webinar will be recorded and made publicly available on <u>ENA's YouTube channel</u>. Please do not turn your video on if you don't want your likeness to be recorded and shared.
- The slides from the webinar will be made publicly available on ENA's website.
- If you would like any further information about the Open Networks programme or have any feedback you would like to submit, please get in touch with us at <a href="mailto:opennetworks@energynetworks.org">opennetworks@energynetworks.org</a>.



## **Agenda**

Item	Start	Finish	Time	Item	Presenter			
1	10:00	10:05	5	Welcome	Avi Aithal (Head of ON, ENA)			
	Flexibility Services (WS1A)							
2	10:05	10:15	10	Flexibility Services overview	Avi Aithal (Head of ON, ENA)			
3	10:15	10:35	20	Procurement Processes (WS1A P2)	Helen Sawdon (Product co-lead, NG-ED)			
4	10:35	10:55	20	Primacy Rules (WS1A P5)	Matt Rivett (Product co-lead, NG ESO) Matt Watson (Product co-lead, NG ED)			
5	10:55	11:05	10	Break				
	Customer Information Provision & Connections (WS2)							
6	11:05	11:15	10	Customer Information Provision and Connections overview	Jim Cardwell (Customer Information and Connections Chair, NPG)			
7	11:15	11:35	20	Queue Management (WS2 P2)	Richard Woodward (Product Lead, NG TO)			
	DSO Transition (WS3)							
8	11:35	11:40	5	DSO Transition overview	Steve Atkins (DSO Transition Chair, SSEN-D)			
9	11:45	11:50	10	DSO Implementation Plan (WS3 P1)	Steve Atkins (DSO Transition Chair, SSEN-D)			
	11:50	12:00	10	COI and UC Register (WS3 P2)	Steve Atkins (DSO Transition Chair, SSEN-D)			
	Wider Open Networks programme							
10	12:00	12:10	10	Wider programme updates	Avi Aithal (Head of ON, ENA)			
11	12:10	12:15	5	AOB	Avi Aithal (Head of ON, ENA)			



# Flexibility Services overview (WS1A)

Ben Godfrey (Flexibility Services Chair, NG ED)

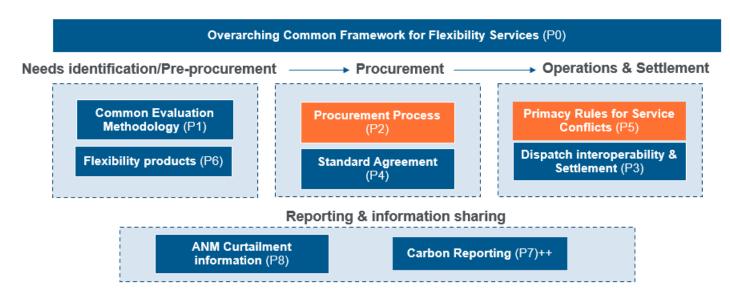




- Supporting delivery of actions from Smart Systems & Flexibility Plan,
- Facilitating the development of local flexibility markets through more standardisation (across DNOs and with the ESO), simplification, and transparency in decision-making.

#### **Recent work areas**

- Open Networks response to the 2022 flexibility consultation will be published as part of our 2023 launch in January 2023.
- Developing an updated and aligned carbon reporting methodology based on flexibility consultation feedback.
- Reviewing industry innovation projects to gather learnings on reactive power products.
- Developing primacy rules for ESO-DSO flexibility service conflicts.
- Mapping out steps to implement closer to realtime flexibility service procurement and to align pre-qualification processes across networks.



Products in orange will be discussed in more detail at this session.



## **Procurement Processes (WS1A P2)**

Helen Sawdon (Product co-lead, NG ED)



## P2 2022 Deliverables

- Recommend steps to real-time procurement;
- Set out a best view of steps required in the short, medium and longer term to move towards real time flexibility procurement.
- Develop an action plan that sets out how the steps identified above will be delivered by network companies and by when.
- Alignment of Pre-qualification;
- Produce recommendations for the alignment of criteria and approach to pre-qualification across DNOs, seeking to align with the ESO where possible.
- Set out a clear implementation plan that outlines how and when these recommendations will be taken forward.



### P2 Procurement Processes – Steps to Real-time Procurement

#### **Short Term**

<12months – Knowledge Gathering

## Remove conflicts and minimize network risk

- Planning Constraints; ERP2/7
- Feasibility Assessment; CEM Tool
- Compliance with Procurement Law; UCR

Dependencies on Open Networks Outputs; P0, P1, P4

#### **Medium Term**

1-3 years - Planning

#### Prepare for operating closer to real-time

- **Products**; Design and approach to new variables
- **Processes**; contract structure, timescales for procurement and decision making
- **Systems**; Internal systems, Digitalisation & Automation, Data management, Marketplace interactions

Dependencies on Open Networks Outputs; P2, P3, P6

#### **Long Term**

1-5 years - Implementation

#### **Implementation Strategy**

- Rate of Evolution; Informed by complexity and liquidity
- **Transparency**; Standardised market information

Dependencies on Open Networks Outputs; P0. Wider dependency on DNO C31e reporting.

Knowledge Sharing; ESO experience, Innovation projects, DNO lessons learnt...



## **Actions & Transparency**

- Stakeholder Feedback;
- Ensure oversight and visibility through ENA
- DNOs should collectively set-out progress to make sure none falls behind
- Oversight of the activities identified in the short, medium and long term steps will fall across two key areas;
  - Reporting on progress through the ENAs Open Networks P0 Product; Common Framework, specifically the inclusion within its annual reporting.
  - 2. Regular consultation with Stakeholders through;
    - DNOs annual C31e engagement
    - ENA Annual Open Networks Consultation



## **Actions & Transparency**

- Reporting on Progress through the ENAs Open Networks P0 Product; Common Framework.
- It is proposed that reporting will include collective DNO updates on Key Indicators.
- DNOs have drafted a 2022 Key Indicators report for inclusion in P0s annual report due Jan/Feb 2023.
- Consultation with Stakeholders Timeline;

Development area	Key Indicator				
Products	Product design				
	Evaluation methodology				
	Settlement mechanics and penalties				
Processes	Inclusion within Common Contract				
	Procurement and service selection timelines				
Systems	Developing existing and new tooling requirements				
	Developing system interfaces				
Engagement	Reporting and market transparency				
	Market liquidity				
	Stakeholder consultation				
Knowledge sharing	Relevant industry trials/roll-outs				

#### April - May

 DNOs publish their C31e Flexibility
 Procurement
 Statements with details of their annual procurement intentions

#### Sept - Oct

 ENA ON Consultation seeks feedback from stakeholders on work undertaken through Open Networks Project

#### Oct - Nov

 Consolidation of feedback to inform ON priorities and programme for following year

#### Jan - Mar

 DNO Consolidation of feedback to inform next C31e Flexibility Procurement Statement



## Recommendations for Pre-qualification Alignment

Standardised templates for both technical and commercial qualification criteria should be agreed in collaboration with ESO, DNOs and wider market platforms.

Prioritising the template for the alignment of technical qualification criteria for Asset/DER registration will give the greatest benefit to the market.

The 'quick win, low effort' aspects identified for the alignment of commercial qualification criteria should also be prioritised.

The standardised templates should be designed to be suitable for manual submission, online upload or API submission and therefore 'Market Place agnostic'.



## **Implementation Timeline**

	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24
Specify P2 PID for 2023 - identify primary actions and deliverables														
Project Initiation - review PID and agree any secondary actions and deliverables														
DNO and ESO collation of existing Technical Pre-qualification Parameters														
Consolidation of Technical Pre-qualification Parameters														
STAKEHOLDER WORKSHOP - Review and consolidate Technical Prequalification Parameters														
Further consolidation of Technical Pre-qualification Parameters					·									
Quick win' consolidation of Commercial Pre-qualification parameters														
STAKEHOLDER WORKSHOP - Review and agree Technical and Commercial proposals														
Prepare proposals for ENA Consultation														
ENA Consultation - seek views on proposals														
Review consultation feedback and update finalise proposals														
Draft implementation plan for Standardised Technical Data Layer Template and Commercial quick win adoption														
Finalise implementation plan for Standardised Technical Data Layer Template and Commercial quick win adoption														
Pre-qualification moves to Open Governance														



## **Stakeholder Engagement**

#### The P2 team is proposing to hold 2 focused workshops with key Stakeholders from;

- Flexibility Service Providers,
- Market Platform Operators, and
- Industry bodies; e.g Energy UK, The ADE

#### The objective of these workshops will be to;

- Agree a standard data layer for pre-qualification criteria.
- Ensure that standardisation removes the barriers to market entry.
- Ensure that any complexity across current practices within DNOs and 3<sup>rd</sup> party market platforms is understood and accommodated.
- Ensure the common data layer can be adopted by DNOs and 3<sup>rd</sup> party market platforms.

We will seek to recruit stakeholder attendance for these workshops in the new year. Both through direct approaches and by leveraging the ENAs existing stakeholder engagement forums.



## **Ongoing Governance**

It is proposed that following the completion of the 2023 objectives for P2, the ongoing governance of prequalification standardisation will be reviewed.

We will consult with stakeholders over the course of 2023 to agree the best approach to this.

Clear information on the decided approach will be published towards the end of 2023.



# Open Q&A



## **Primacy Rules (WS1A P5)**

Matt Rivett (Product co-lead, NG ESO)
Matt Watson (Product co-lead, NG ED)



## **Description of Primacy**

Conflict between one or more services required by the ESO or the DNOs may result in inefficiencies within the electricity system. In order for the ESO and the DNOs to manage service conflict and optimisation efficiently and transparently, whilst also facilitating the potential for flexibility market platforms, there is a need to develop a set of clear principles and "primacy" rules. These will enable the order of despatch of services to be influenced by whole system value and ensure that the division between market/price-driven actions and the electricity system hierarchy of operations/needs is clear and transparent.

#### **Product Aims**

Using work developed under Open Networks (2019 WS1A DSO Services – Conflict Management & Cooptimisation and DSO Revenue Stacking), this product will develop a set of principles and primacy rules for addressing flexibility service conflicts (T-D). These rules will look to balance: the local networks' technical requirements; the risks to the overall operability of the whole system; the value for Flexibility Service Providers (FSPs) through the facilitation of market / price driven actions; the needs of emerging market based platform developers; and ultimately the end consumer.



## **P5 Primacy Product Update**

Following the development of Primacy Principles, and prioritising Use Cases, the product has been progressing with a focus on two core workstreams:

#### **Rules Development Increment 1**

- This increment has progressed work on development of Rules for the following Use Cases:
  - The new Regional Development Programmes (RDP) Transmission Constraint Management service (TCM) vs. DNO Flexibility Services (on different assets in same area).
  - A subset of Balancing Mechanism (BM) actions (covers constraint management, inertia management and voltage management) vs. DNO Flexibility Services (on different assets in the same area).

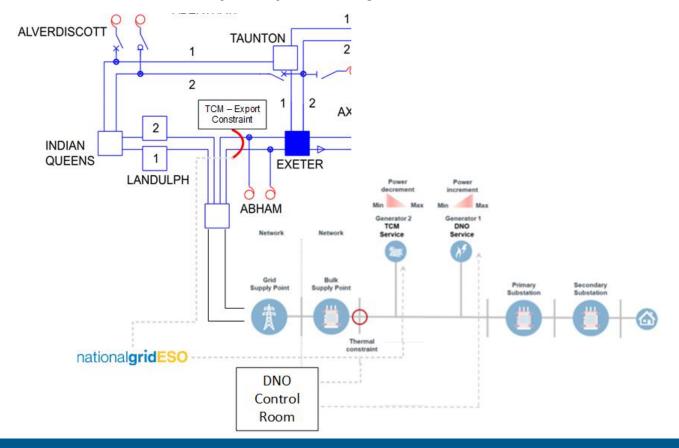
#### **Ruled Development Increment 2**

- Following earlier product work to consider Primacy Rules in areas where services could interact with DNO ANMs, we
  have progressed consultancy work covering the following Use Case:
  - Short-Term Operating Reserve (STOR) vs. DNO ANM (on different assets in the same area).
- The outputs from this work are being shared as part of this Challenge Group.



## **Increment 1 Use Case 1: TCM & DNO services**

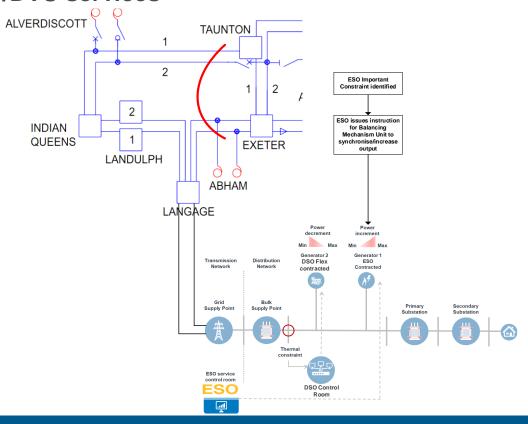
DNO GTU/DTD Active Power services (Sustain, Secure, Dynamic) & the DER transmission constraint management GTD service (TCM) developed in the RDPs





#### **Increment 1 Use Case 2: BM actions & DNO services**

BM instructions from the ESO to manage thermal constraints, voltage and inertia requirements. Example where the ESO issues an incremental active or reactive power instruction and DNO has contracted for GTD/DTU services





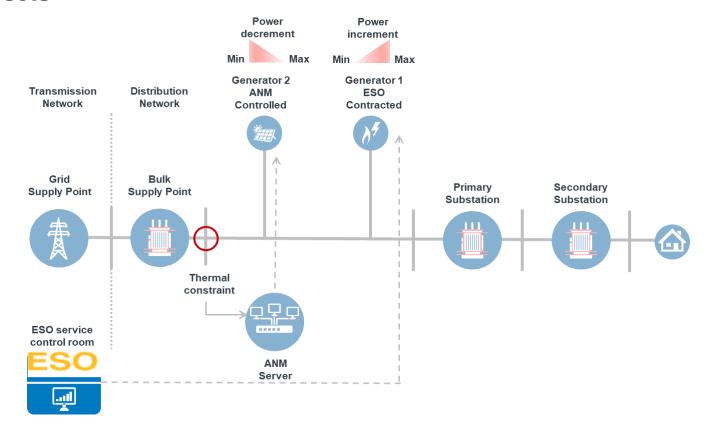
#### **Increment 1: conclusions**

- As the DNO requirements are geographically constrained, it has fewer alternative options. As such the DNO
  has primacy in these use cases.
- Our initial rules focus on simplified sharing of a "Risk of Conflict" report at the week ahead from the DNO to the ESO.
- The ESO will then preclude the relevant sites from the impacted services.
- The rule can be improved over time to move closer to real time and add further data exchanges from the ESO to the DNOs
- We have identified the need to build out a CBA in investment planning timelines to ensure that managing the conflict operationally remains the best whole system action.



### **Increment 2: STOR & ANM**

STOR services (Generation Turn Up, Demand Turn Down, reserve services) and generation led DNO ANM on different assets





## **STOR vs ANM: Rules considered**

DNO primacy <sup>1</sup>	ESO primacy <sup>1</sup>	Joint primacy
<ul> <li>STOR providers excluded (by the ESO) from provision of the service if this coincides with forecast ANM curtailment activity in a given geographical area</li> </ul>	RULE 2  DNO holds headroom value in ANM  Systems to allow STOR to be provided	RULE 6 The ESO would pay the DNO (and therefore ANM customers or Flex providers) to hold headroom on their ANM systems
<ul> <li>Similar to the principles in rule 1, however, in this case, information would be provided to the market for STOR providers to exclude themselves from participation when ANM activity is forecast in the area</li> </ul>		RULE 7 The STOR provider would pay the DNO (and therefore ANM customers or Flex providers) to hold headroom on the ANM systems
<ul> <li>RULE 4</li> <li>ESO over-procures to help counteract any non-delivery as a result of ANM pullback.</li> </ul>		

Types of forecast for DNO has primacy rules	Types of headroom for ESO primacy and joint primacy rules <sup>2</sup>				
i) Static forecast – if the DNO curtailment shows any potential for ANM activity, the rule would apply.	i) Static headroom – headroom always held in areas where ANM and STOR providers exist. This allows for simple systems, but means holding more headroom.				
ii) Dynamic forecast – A threshold of curtailment would be agreed (as an example), above which the rule would apply.	ii) Dynamic headroom – headroom only held which equates to volume of STOR successful in Day Ahead (DA) auction. Requires more complex integration of systems				

<sup>\*1</sup>The numbering of the rules is legacy from previous work developed by ENA. There are 6 rules in total numbered 1-7, there is no rule 5.

<sup>&</sup>lt;sup>2</sup> Option c) dynamic headroom held by an independent party that handles the payment transfers is considered out of scope.



## **ANM vs STOR CBA Interpretation**

Across the scenarios, rule 2b came out as the most efficient.

However there are a few key elements that need to highlighted when interpreting the results.

- These look at the cost of mitigating the conflict. They do not include the benefits associated (improved system reliability). As such all results are negative.
- They are focussed on a single year (June 21- May 22)
- They only consider a single service
- They apportion the capital costs associated over 7 years
- They are highly dependent on the Specific STOR market rules. These include:
  - A pay as clear auction (increases in the marginal cost, impact costs for the whole volume)
  - Availability carried out on a daily basis (for example in scenario 3, curtailment for 5% of HHs translates to a 29.3% of days)



## **Next Steps**

We are now kicking off some follow up work to refine the analysis. This will include:

Option	Reason
Look at 2hr STOR windows	This is a large sensitivity in the initial analysis. The new Reserve products are considering such a change to availability setting.
Quantify the Counterfactual	This would allow us to be clear on the value of implementing any rules, and ensure that the costs do not outweigh the benefits.
DNV review of rules and recommendations for improvements	Independent review of rules will allow us to ensure that no options have been omitted
Formal Sensitivity Analysis on report	This will help us confirm the key sensitivities, and ensure there are no nearby knife edges.
More Granular modelling of ANM	This will allow us to model ANM in more detail, and create diversity across schemes. This reduces the risks of overstating the conflict.
Make CBA independently accessible	This will improve transparency of the results.



# Open Q&A









# Customer Information Provision and Connections overview (WS2)

Jim Cardwell (Customer Information Provision and Connections Chair, NPG)

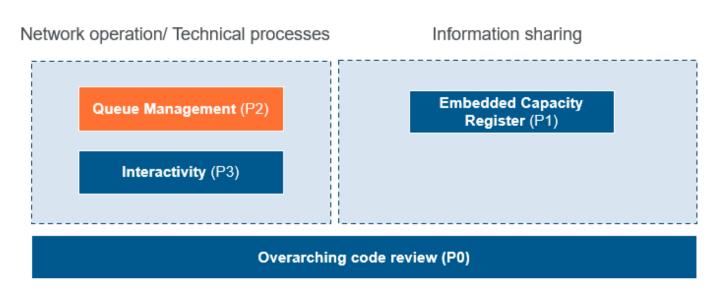
### **Customer Information Provision and Connections overview**



- Enhance information provision to customers to aid them through the connections and contracting processes and facilitate the realisation of value for their connected technology.
- Communicate whole electricity system needs and facilitate the translation of this into value for asset developers and owners as well as 3rd parties outside direct DSO contracted services (as highlighted in the Flexibility Workstream).

#### **Recent work areas**

- Working to improve accessibility and visibility of networks' Embedded Capacity Registers, with digitalised publications including 50kW+ assets (instead of the previous 1MW+ assets) expected in the new year.
- Working to reduce long connection queues for customers through creating a tracker for implementing Queue Management principles across networks and continuing to push for the relevant code modification.



Products in orange will be discussed in more detail at this session.



# Queue Management (WS2 P2)

Richard Woodward (Product Lead, NG TO)



## What is 'queue management'?

- Queue management (QM) means the commercial arrangements available to network companies to actively manage contracted connections queues.
- QM enables network companies to ensure that allocated network capacity is fully utilised, prevent inefficient or stranded network investment, and promote effective competition by better facilitating the completion of viable connection schemes.
- The main components of an effective QM policy include:
  - a) **Project milestones** these form the agreed project management benchmarks by which network companies and developers can track progress towards a contracted connection date.
  - **b) Tolerance or notice periods** provides customers proportionate but finite flexibility to rectify delays which could lead to milestones not being achieved on time.
  - c) Clear consequences for stalled projects network companies will have a stronger commercial right to terminate connection agreements with customers whose projects are demonstrably stalled or no longer viable.
- Open Networks WS2 Product 2 have been responsible for developing and implementing whole system 'queue management' approach.



## WS2 P2 queue management policy implementation progress

#### **July 2021:**

- Policy guidance ('User Guide') is published, setting out the approach for network companies to include queue management processes in connection agreements with relevant customers.
- DNOs begin to implement the QM guidance, clarifying the type of projects which are in/out of scope (e.g. HV, EHV).
- NG ESO raises a CUSC code change to implement the QM guidance as policy at transmission.

#### **March 2022:**

- QM CUSC code change (CMP376) pauses to recalibrate ENA/ON guidance for easier application at transmission.

#### **July 2022:**

- ON WS2 reconvene meetings to compare DNO progress of applying the policy, sharing best practice and potential areas of improvement for the published guidance. Implementation data tracker template agreed.

#### September 2022:

CMP376 resumes.

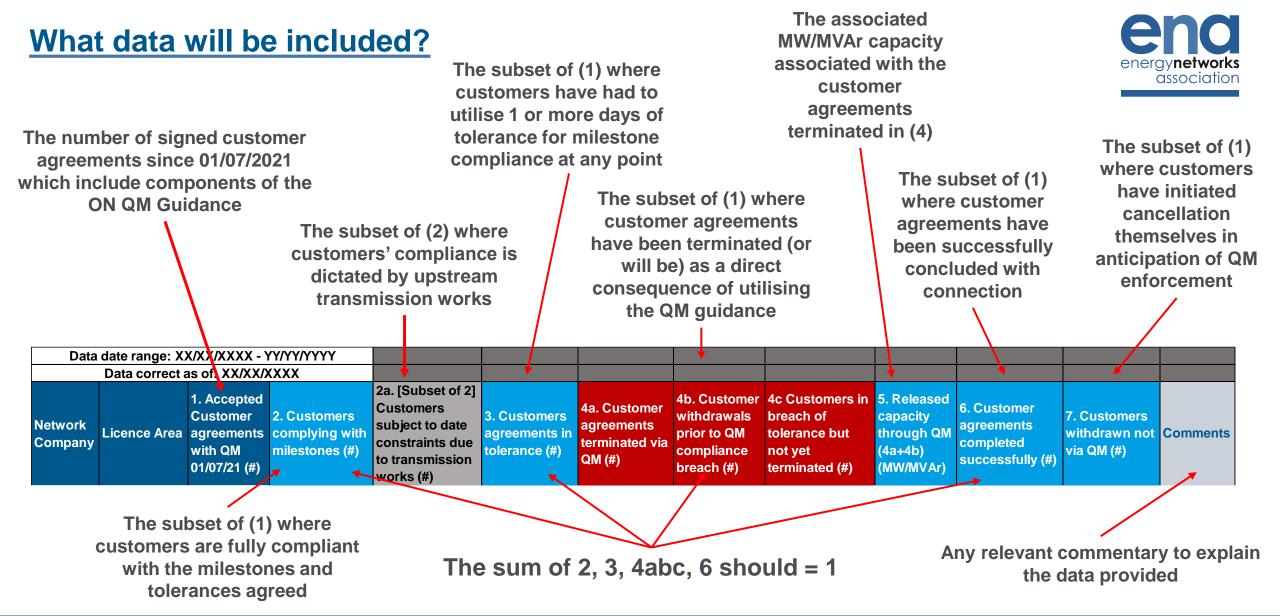
#### December 2022:

- CMP376 consultation published.
- DNOs prepare to share data related to first year of QM guidance implementation.



## WS2 P2 – QM implementation tracker overview

- WS2, in conjunction with the ON Steering Group, agreed that QM implementation should be tracked and reported externally.
- This is to ensure that the QM approach definitively leads to effective outcomes e.g. reducing connection queues and capacity hoarding, plus speeding up connections times.
- Tracking will also better ensure consistency of application between the network companies or allow intervention to amend the ON QM guidance to optimise it.
- It was agreed that data should be updated on a rolling cumulative basis (once a year) on a contract/project level, with the reporting window and reporting snapshot date agreed in advance.
- Data should only be provided here where network companies are applying the QM guidance. DNOs should flag where this is the case and what alternative approaches are being taken which might be relevant in consideration of the ON QM guidance.

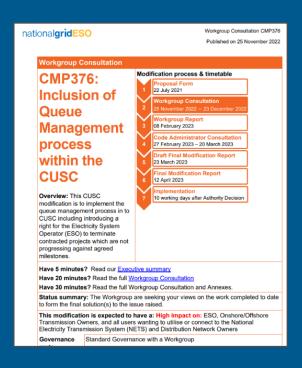




## **Next steps/actions for data publication**

- 1. Ensure any final data gaps are resolved.
- 2. Share with Dissemination Forum for feedback (today!)
- 3. Agree with Open Networks Steering Group how/when to publish externally and process for on-going updates (W/C 12<sup>th</sup> Dec).





## **Queue Management Code Mod update**



#### **Development of the transmission policy proposal**

- NG ESO raised code modification CMP376 to formally introduce QM arrangements under the Connection and Use of System Code (CUSC). This modification will be subject to Ofgem determination once development work is complete.
- The NG ESO proposal inherits a lot of the basic elements of the WS2 P2 Queue Management guidance:
  - Consistent 'whole system' milestone categories (e.g. land rights, planning, FID).
  - Developer responsibility to ensure and evidence compliance.
  - Rectification periods.
  - Termination as the outcome for compliance breaches.
- However, following significant push-back by developers, NG ESO has further evolved their policy proposal for better application at transmission...



#### NG ESO response to feedback – Changes taken forward

"Tolerance periods and cumulative delay proposals are confusing"



Tolerance periods and cumulative delay concepts have been removed. Instead, adjustments have been made to milestone durations and to add notice periods.

"Milestones do not cater for seasonality or challenges obtaining planning"



Timescales have been amended to reflect a number of factors, including seasonality and other constraints in relation to obtaining planning consents.

"Referencing milestones against Offer date makes it difficult for us to sequence our development activities"



The timescales now run backwards from Connection Date

"The use of connection voltages to tier milestone compliance durations is arbitrary"



Milestone durations are to be tiered based on the lead time for project connection. This removes any risk of undue discrimination by technology or connection voltage.



#### **Next steps for CMP376**

1. The CMP376 proposed solution and workgroup progress to date is now out for consultation with industry *until 23<sup>rd</sup> December* 

Please submit a response!

2. The workgroup will consider the responses from industry early in the new year, including potential amendments to the ESO's proposal or development of workgroup-led alternatives

NGET have already outlined a potential alternative which will time-limit implementation to ensure that the QM policy applies to new *and* existing Users as soon as possible (albeit this needs work!)

3. The Code Administrator timetable for CMP376 estimates that the modification will be submitted to Ofgem for determination *in April 2023*.

This will coincide neatly with the conclusion of the TEC Amnesty which has recently been extended by ESO to encourage further applications.



## Open Q&A



### **DSO Transition overview (WS3)**

Steve Atkins(DSO Transition Chair, SSEN-D)

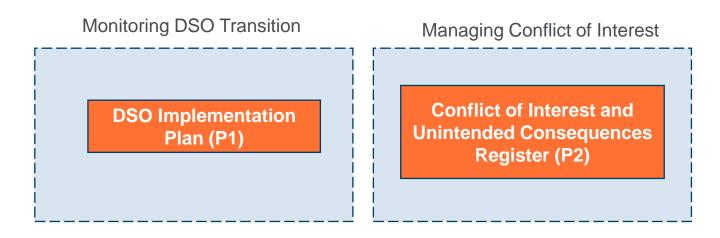
#### **DSO Transition overview**



- Fulfil an overarching role to progress the development and implementation of the least regrets pathway to
  Distribution System Operation in line with policy across the programme, including identifying and addressing
  potential conflicts of interest and unintended consequences.
- Serve as a forum for discussion on key DSO related outcomes, including upcoming policy positions, and will
  consider how the DSO related outcomes are taken forward by the various workstreams in the Open Networks
  programme.

#### **Recent work areas**

- Monitored impacts of the DSO transition on various internal and external stakeholders by updating the Conflict of Interest and Unintended Consequences Register,
- Final DSO Roadmap update.



Products in orange will be discussed in more detail at this session.

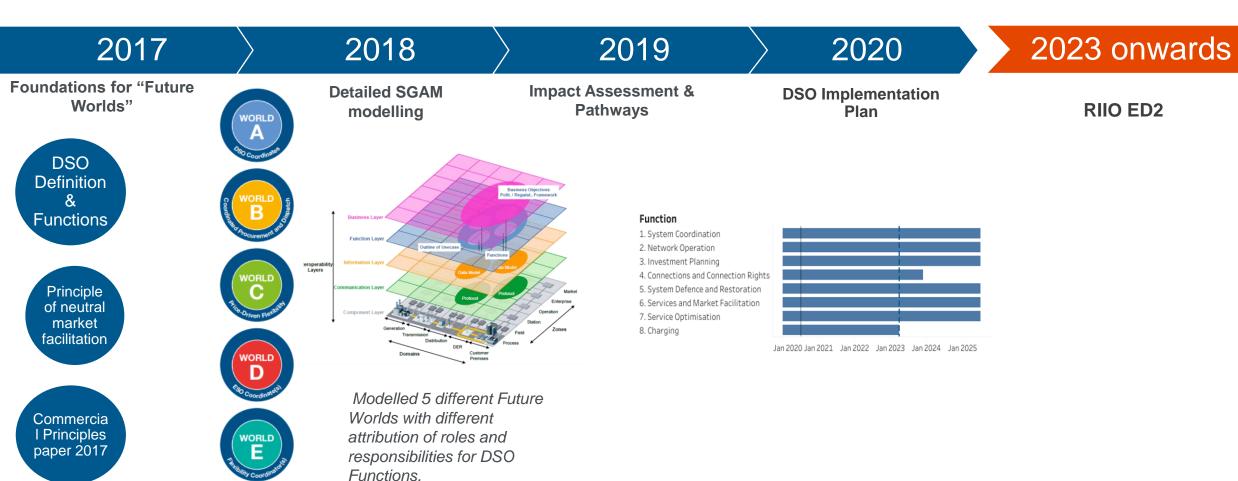


### **DSO Implementation Plan (WS3 P1)**

Steve Atkins (DSO Transition Chair, SSEN-D) Avi Aithal (Head of ON, ENA)

#### **DSO Transition - The journey so far**







# Conflict of Interest and Unintended Consequences Register (WS3 P2)

Steve Atkins (DSO Transition Chair, SSEN-D) Avi Aithal (Head of ON, ENA)

#### **History: the Col and UC Register**



- Part of the wider ENA ONP and Baringa activity on ON Future Worlds in 2018
- COI and UC scoped out with ONP and stakeholders in a workshop 4/12/2018
- Six themes identified
  - Distributional Customer Impacts
  - Risk of Regret
  - Operational Viability

- System Security
- System Operator Conflicts
- Market Power and Gaming
- Importance recognised scoped out as a standalone product (ON 2019 WS3 Product 7)
  - Included Conflicts of Interest and Unintended Consequences of the transition to DSO but NOT risks to the DSO model or operations
  - Product to explore risks and focus on mitigation measures
  - Outputs: A spreadsheet to act as a risk log and tracker; recommendations for work in 2020
  - Outcomes: transparency for stakeholders; better informed decisions on the design of DSO
  - First version shared with ON AG autumn 2019

#### **Evolution of the Col and UC Risk Register**



#### 2020 Changes

- Introduction of Heatmaps
- Stakeholder engagement -
- ON Advisory
   Group Updates /
   requests for
   feedback
- Mitigation
   Actions linked to
   ON Products
   (where relevant)

#### 2021 Changes

- Refresher Webinar
- Blogs/Social Media
- Engage ENA Customer & Social Issues Group to monitor/advise on vulnerable customer impacts
- More explicit links with DSO implementation plans
- Separate systemic risks from more actionable risks – subregisters that fit one page

#### 2022 Changes

- Scrub old superseded activities
- Split risks to be monitored centrally by Open Networks, and those to be monitored by individual network companies from 2023 onwards



## Open Q&A



## Wider programme updates

Avi Aithal (Head of ON, ENA)



#### Wider programme updates

#### Recent activities

#### **Evolution of Open Networks**

Review of the programme scope and governance for 2023 continues, factoring in stakeholder feedback and key industry developments.

#### 2022 End of Year report

Later this week, we'll be publishing our 2022 End of Year report highlighting the year's achievements. Join our newsletter to be notified.

A full timeline of deliverables to date can be found <u>here</u>. We remain on track to deliver the 2022 programme in full.

#### Upcoming activities

#### **2023 Open Networks launch**

Open Networks will launch 2023 work in January. Alongside our new workplan, we'll share our response to the 2022 flexibility consultation that guided our 2023 priorities.



## **AOB**

Sotiris Georgiopoulos (Chair of ON Steering Group, UKPN)



#### **Useful Links**

Programme Scope for 2022

2021 End of Year report

Stakeholder events & supporting material

Open Networks homepage

We welcome feedback and your input

Opennetworks@energynetworks.org

Click <u>here</u> to join our mailing list



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