



DCUSA Change Report

DCP 117 - Treatment of 'Load related new connections & reinforcement (net of contributions)' in the Price Control Disaggregation Model

1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the Distribution Connection Use of System Agreement (DCUSA) and details DCP 117 'Treatment of 'Load related new connections & reinforcement (net of contributions)' in the Price Control Disaggregation Model (PCDM)'.
- 1.2 The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.
- 1.3 Parties are invited to consider the proposed amendments provided as Attachment 2 and submit votes using the form provided as Attachment 6 to dcusa@electralink.co.uk by **15 June 2015**.

2 BACKGROUND AND SUMMARY OF DCP 117 'TREATMENT OF 'LOAD RELATED NEW CONNECTIONS & REINFORCEMENT (NET OF CONTRIBUTIONS)' IN THE PRICE CONTROL DISAGGREGATION MODEL'

- 2.1 DCP 117 was raised by GTC (For and behalf of the Electricity Network Company Limited). The Proposer of the Change Proposal explains that on 9 December 2011 the Authority published its decision to reject DCP094¹. In advice given as part of their decision Ofgem stated: "We therefore suggest that the modification be resubmitted and the Workgroup carry out further analysis in respect of the cost reflectivity of each approach". This change proposal is essentially a resubmission of DCP094 to enable such further analysis to be undertaken.
- 2.2 The intent of this change proposal is to correct distortions in the calculation of the percentage split between direct/indirect costs¹ brought about by the way net costs described as 'Load related new connections & reinforcement (net of contributions)' are calculated and allocated to different network tiers. The percentage split between direct/indirect costs is used as part of the calculation of discount factors where an LDNO connects to the DNO 'Calc – DNO Opex allocation'

¹ Treatment of 'Load related new connections & reinforcement (net of contributions)' in the Price Control Disaggregation Model used to determine LDNO discount factors

- 2.3 The intent of this change proposal is broader in scope than the original DCP094 since it allows alternative solutions to be considered to address the flaw brought about by the way 'Load related new connections & reinforcement (net of contributions)' costs are treated (e.g. allocating customer contributions identified in Regulatory Reporting Pack (RRP) 2.4 to different voltage tiers).
- 2.4 The Proposer explains that they believe that the current calculation and allocation of net costs described as 'Load related new connections & reinforcement (net of contributions)' leads to the allocation of costs within a voltage tier being distorted in favour of the upstream DNO.
- 2.5 The Proposer further notes that by correcting the perceived defect, the methodology will become more cost reflective and therefore less likely to distort competition.

3 PROPOSED LEGAL DRAFTING

- 3.1 The draft legal text for DCP 117 has been reviewed by the DCUSA legal advisors and is provided as Attachment 2.
- 3.2 The legal drafting will amend Schedule 16 of DCUSA to change the way that costs described as 'Load related new connections & reinforcement (net of contributions)' are allocated within the Price Control Disaggregation Model.
- 3.3 Paragraph 101 is amended to set out that, in addition to using information provided by DNOs in their 2007/2008 Regulatory Reporting Pack submissions to Ofgem, information provided by DNOs to Ofgem in table LR1 of their Forecast Business Plan Questionnaire (FBPQ) submissions will be used to allocate operating expenditure.
- 3.4 In paragraph 101, the "Allocation key" column for costs described in the "Allocation rules" table as 'Load related new connections & reinforcement (net of contributions)' is amended to require them to be allocated in accordance with the provisions of a new Paragraph 102A. The current Paragraph 102A is amended to become paragraph 102B.
- 3.5 The effect of the new paragraph 102A is to change the allocation approach for customer contributions. Currently customer contributions reported in table 2.4 of the RRP for 2007/2008 are used to offset costs only at the LV tier (irrespective of which network tier the contributions relate). Customer contributions are not allocated to

higher network tiers with contributions in excess of the LV costs are ignored in the model.

- 3.6 New Paragraph 102A requires that customer contributions reported in table LR1 of DNOs FBPQ submissions for each network tier are used instead of the information in table 2.4. Data in the FBPQ LR1 is already used to determine the MEAV cost driver for the PCDM.
- 3.7 Additionally, customer contributions (reported in FBPQ LR1) relating to indirect costs (including surpluses in customer contributions for direct costs) are treated as allowed revenue in the "DNO final allocation" worksheet in the price control disaggregation model) and are allocated to network tiers using the opex cost driver. This means that all customer contributions are considered by the PCDM.

4 WORKING GROUP ASSESSMENT OF DCP 117

- 4.1 The DCP 117 Working Group met on 17 occasions. The Working Group was comprised of Distribution Network Operators (DNOs), Independent Distribution Network Operators (IDNOs), as well as Ofgem representation. It is noted that all DCUSA Parties were invited to join the Working Group. Meetings were held in open session and the documents of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 4.2 The Working Group issued one Request for Information (RFI) and two consultations. These documents are included as Attachments 3, 4 and 5 respectively.

5 REQUEST FOR INFORMATION – MARCH 2012

- 5.1 The RFI was issued on 20 March 2012 and requested information from Parties about the different options being discussed for progression of DCP 117.
- 5.2 The RFI focussed on the following options which were identified by the working group for potential progression are as follows:
- Option 1: Maintain the status quo; realising that this may not be the most cost reflective option.
 - Option 2: The option put forward under DCP 094.

- Option 3: Develop a solution for costs falling under the description '*Load related new connections & reinforcement (net of contributions)*' in the method M (subsequently referred to as the PCDM) workbook which:
 - Assumes that costs incurred at the low voltage network tier are wholly contributed to (i.e. the net value of costs and contributions is zero);
 - Assumes negative cost figures for each a network tier correspond directly and solely to customer contributions are in excess of costs incurred at that network tier; and
 - Allocates the customer contributions that are in excess of the LV costs to and between the higher network tiers; such allocation being carried out using appropriate cost drivers.
- Option 4: request that DNO's carry out detailed analysis using actual cost data from past schemes to determine the percentage of costs that should be allocated to the appropriate network tiers.

5.3 The RFI and responses from the DNOs are included as Attachment 3.

6 WORKING GROUP CONSULTATION ONE – AUGUST 2012

6.1 The Working Group issued a consultation on 6 August 2012 in order to give parties an opportunity to review and comment on DCP 117. The consultation focussed on the 3 options for progression that the Working Group had developed and put forward.

- Option 1 was to:
 - Allocate the total of customer contributions that is greater than the costs reported at the LV tier to the HV and EHV tiers in the proportion of MEAVs at these network levels.
 - To net off the customer contributions allocated to the HV and EHV network tier against the reported costs at each of these tiers.
- Option 2 was to:
 - Net off the customer contributions against the total costs across all network tiers reported in this category.
 - Allocate the residual costs between the LV, HV and EHV tiers in proportion to the current allocation of costs.
- Option 3 replicated the proposal put forward by DCP 094:

- To exclude the use of the costs described as 'Load related new connections & reinforcement (net of contributions)' from the calculation of the weighted average percentage of operational costs at each network tier.
- This is on the basis that the way these net costs are reported misrepresents the costs incurred and customer contributions received in respect of assets provided at each network tier.

6.2 There were eight responses received to the consultation. The Working Group discussed each response and its comments are summarised alongside the collated Consultation responses in Attachment 4. A summary of the responses received, and the Working Group's conclusions are set out below:

Question 1 - Do you understand the intent of DCP 117?

6.3 The Working Group noted that all respondents understood the intent of DCP 117.

Question 2 - Are you supportive of DCP 117's principles?

6.4 The Working Group noted that all respondents to the Consultation are supportive of the principles of DCP 117.

Questions 3 - Do you agree that DCP 117 better facilitates the DCUSA General Objectives and DCUSA Charging Methodology Objectives as explained by the Working Group?

6.5 The Working Group noted that the majority of respondents to the Consultation agree that DCP 117 better facilitates the DCUSA General Objectives as set out in the CP.

6.6 One DNO respondent noted that this will depend on the final option suggested by the Working Group to facilitate this change proposal. The Working Group agreed that it would be pragmatic to email this respondent and ask them to provide clarity for each of the three options and what objectives they feel would be better facilitated; and also if in their opinion if any option does not facilitate the objectives.

6.7 The respondent replied to the email and confirmed that they agree with the working group's assessment that the change proposal better facilitates the DCUSA General Objectives 1, 2 and 3.

6.8 A different DNO respondent explained that although they believe that DCP 117 better facilitates the General Objectives, the change proposal looks to correct a perceived distortion in the calculation of the percentage split between direct and indirect costs. However, they noted that they do have a concern that this could be changing a position which is in fact correct and does not require modification. They further explained that cost reflectivity would be improved if an issue exists and this change corrects it, but would not if no actual distortion exists.

6.9 The Working Group agreed to email this respondent and ask for additional clarification regarding their response and to pose the following questions:

- Why they feel that proposal could be changing a position is correct, please clarify why it may be correct that no contributions should be set against HV and EHV tiers.
- Why contributions in excess of the LV costs should be ignored.
- Is it their position that no distortion exists within the allocation of those costs.

6.10 The DNO respondent replied and explained that they do believe that the changes suggested as a result of DCP117 appear to be better than the current arrangements, they are still not entirely sure that there is a distortion which this change will actually correct. They further explained that if there isn't currently a distortion in the calculation then changing it will move it further away from the correct position.

6.11 They further noted that they would like to see more actual evidence in order to illustrate to any party that the proposals are better than the current arrangements.

6.12 The Working Group noted that all respondents believed that DCP 117 better facilitated the DCUSA General as set out in the Consultation.

Questions 4 -Does the CP facilitate DCUSA Charging Methodology Objectives?

6.13 The Working Group noted that all of the respondents to the Consultation agree that DCP 117 better facilitates the DCUSA Charging Objectives as set out in the CP.

6.14 One DNO respondent noted that the CP better meets the DCUSA charging methodology objectives as it improves the allocation of costs between the DNO and IDNO.

- 6.15 Another DNO respondent agreed that DCP 117 both increases cost reflectivity and competition.
- 6.16 It was noted by one IDNO respondent that in particular, DCP 117 proposes changes that improve the cost reflectivity of CDCM that, in turn, supports the development of competition within the market.

Question 5 - Do you feel that the analysis contained within Appendix C – ‘DCP 117 – Detailed Analysis’ sufficiently demonstrates the effects of the different options being discussed within the Working Group?

- 6.17 The Working Group noted that the majority of respondents to the Consultation agreed that the analysis explained the different options effectively.
- 6.18 One DNO respondent noted that the analysis comprehensively explains the effects of the different options.
- 6.19 One respondent noted that the detailed analysis is very complicated and could confuse the audience. The Working Group noted that within the analysis, there is a detailed analysis sheet; but also a summary sheet which has been made in order to show the effects without having to simply rely on the detailed calculations. It was noted that this should suffice in explaining the analysis more efficiently.
- 6.20 One DNO respondent explained that although they believe that a great deal of analysis has been undertaken, they do also have the view that a great deal of it could be considered only to be a belief of the likely impact of the change. It is further noted that they do not believe that the supporting comments can be supported by actual evidence; as the actual correct or ‘final’ number isn’t known.
- 6.21 The Working Group noted that the only way to get this information on a ‘factual’ basis is for all the DNOs to model all of the options themselves, and then to provide the Working Group with these numbers. (This refers to Option 4 detailed in the original RFI, where DNOs would look at actual costs of historic schemes to determine the percentage of costs to be allocated to the appropriate network tiers.)
- 6.22 The Working Group noted that it can take the proxy data and use it, but it is up to the DNO to carry out their own individual impact assessments.

- 6.23 The Working Group also felt that whilst the actual final numbers may not be known, the point of this particular question was to find out whether or not the analysis supports the options discussed. However, the Working Group noted that the DNOs will have to carry out their own analysis in the end.
- 6.24 The Working Group questioned what was meant by actual evidence – it was confirmed that to get the “real” figures you would need the real project numbers that is used in RRP 2.4 for the given year; and to provide it to the working group (see Para 5.2 Option 4).
- 6.25 It was agreed that this would be the only way to get an absolute result; but the question is whether this data is available.
- 6.26 It was noted that the Working Group has already discounted this option as it would be too detailed and require too much work; but it appears that if definitive numbers are required for this CP to progress that this may be the only way forward but this is not the will of the Working Group.

Question 6 - Do you feel that the sensitivity analysis contained within Appendix D – ‘DCP 117 Sensitivity Analysis’ sufficiently demonstrates the sensitivity between the Status Quo and the different Options?

- 6.27 The Working Group noted that the majority of respondents to the Consultation agreed that the Sensitivity Analysis sufficiently demonstrates the differences between the status quo and the three options being put forward by the Working Group.
- 6.28 One IDNO respondent explained that the sensitivity analysis is useful in that it shows that the difference in resulting LDNO discount tariffs between each of the three options proposed is not significant.
- 6.29 The PCDM spreadsheets are outside the governance of DCUSA, so whilst we believe the sensitivity analysis is reasonable, we think it is ultimately the responsibility for each DNO to validate the assessment and how it impacts on them.
- 6.30 A DNO respondent noted that the Sensitivity Analysis demonstrates the difference between the two options and the status quo, however, it doesn’t answer the question as to whether this is the ‘correct’ answer just that it is different.

- 6.31 The Working Group noted that the test which needs to be applied under the DCUSA is that the CP better meets the objectives, not that this is not necessarily the “correct” way as this is an absolute term; whereas most items within the methodology (CDCM, PCDM and EDCM) are based upon assumptions and theory. To determine what is correct is a “subjective” view.
- 6.32 The objective of the sensitivity analysis was to demonstrate the differences between the options being put forward and not whether one is correct, or more correct, over one another.

Question 7 - Provide comments on the three options which have been described within the analysis, including: strengths/weaknesses of each option, preferred option (including supporting comments) and any further comments the Working Group should consider in regard to any of the options.

- 6.33 The Working Group noted that there was not an overall majority of respondents who favoured one option over another. Option 2 was preferred by 3 of the respondents, while both Option 1 and Option 3 received the support of 2 respondents.

Question 8 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP? If so, please give details, and comment on whether the benefit of the change may outweigh the potential impact and whether the duration of the change is likely to be limited.

- 6.34 The Working Group noted that no issues were raised by respondents to the Consultation.
- 6.35 One DNO respondent noted that their comments on this DCP are based upon consideration of its potential impacts on Distribution Use of System (DUoS) Tariffs in isolation. The cumulative/net effect of all DCPs currently being considered has not been modelled. Therefore, making an assessment of the combined impact on DUoS tariffs is difficult. Their opinions in this response are provided on that basis, and they urge that DCPs are progressed with some caution until these cumulative/net impacts can be modelled and assessed for each of the 14 LDSO Areas.
- 6.36 The Working Group discussed this point and noted that it is the advice of Ofgem and the DCUSA Panel that all CPs are to be considered individually and on their own merit.

Question 9 - Are you supportive of the proposed implementation date of October 2012?

- 6.37 The Working Group noted that there was some confusion with the implementation date of this CP, as some respondents had mistakenly assumed that it would involve a mid-year price change.
- 6.38 One respondent noted that they definitely do not agree with the implementation date and that this should be implemented in April 2013 as it is too late for a mid-year price change.
- 6.39 Another respondent explained that they presume that the proposed implementation from 'October 2012' and it is the intention to use for charges effective from 1 April 2013 charges. If that is the case then they would agree to the proposed implementation date.
- 6.40 The Working Group noted that it would be implemented from October in order to be ready for Indicative Charges in December, so that it would be active in April 2013. There would not be a mid-year price change involved with this CP.

Question 10 - Are there any alternative solutions or matters that should be considered by the Working Group?

- 6.41 The Working Group noted that there were no alternative solutions provided by respondents.

7 WORKING GROUP CONSULTATION TWO – OCTOBER 2014

- 7.1 The Working Group issued a second consultation on 31 October 2014 in order to give parties an opportunity to review and comment on DCP 117. The consultation focussed on the main option for progression that the Working Group had developed and put forward.
- 7.2 The proposed solution is to calculate connection costs net of customer contributions at each network tier using data derived from the "FBPQ LR1" worksheet for each relevant network tier. Since the "FBPQ LR1" worksheet contains information for the 10 year period 2005 to 2015 the average for the 10 year period is used to determine a figure for each network tier. Customer contributions identified as relating to indirect costs are not allocated to network tiers. Customer contributions in excess of the

connection costs for each network tier are not considered under “Load related new connections & customer specific reinforcement”

- 7.3 There were seven responses received to the consultation. The Working Group discussed each response and its comments are summarised alongside the collated Consultation responses in Attachment 5.
- 7.4 A summary of the responses received, and the Working Group’s conclusions are set out below:

Question 1 – Do you agree with the intent of DCP 117?

- 7.5 The Working Group noted that all respondents agreed with the intent of the CP.

Question 2 – Do you agree with the principles of DCP 117?

- 7.6 The Working Group noted that all respondents agreed with the principles of the CP.

Question 3 – Do you understand the approach being proposed to address the issues presented within DCP 117?

- 7.7 The Working Group noted that all respondents understood the approach being set out to progress DCP 117.

Question 4 – Do you agree with the approach to use data from FBPQ LR1 submissions to allocate costs and customer contributions to network tiers?

- 7.8 The Working Group noted that all respondents agreed with the approach being taken forward which will use the FBPQ LR1 submissions.
- 7.9 A DNO respondent noted that they agree that the customer contributions data that is provided in table LR1 allows for customer contributions to be split between voltage levels and that this will improve the accuracy of the discounts used to calculate the LDNO tariffs.
- 7.10 An IDNO respondent explained that they agree with the approach and that data from the LR1 submission is already used in the PCDM (it is one of the components used to calculate the Net-Capex cost driver (other components of the Net-Capex cost driver calculation are also derived from FBPQ submissions)).

- 7.11 It was further noted that by using LR1 data to allocate connections costs net of contributions to network tiers in the 'Calc – Opex Allocation' work sheet is consistent with the use of the data in determining connections Capex for the Net-Capex cost driver.
- 7.12 Additionally they noted that they are not aware of any other sources for this information. The current approach (to use RRP2.4 data) does not contain sufficient granularity.

Question 5 – Do you agree that in using data from FBPQ LR1 submissions, it is the average of data over the 10 period 2005 to 2015 that should be used? Alternatively, should the data for the year 2007/8 only be used? Please explain your rationale.

- 7.13 The Working Group noted that all respondents agreed that a 10 year average would be the best approach to use to progress this solution.
- 7.14 An IDNO respondent noted that they believe that a 10 year average is likely to be more accurate than a snapshot from a single year (2007/08). They further explained that they would be wary of using a single year as the year in question could prove an historic outlier and therefore distort the picture, whereas taking a 10 year average will help smooth out any outliers and give a more meaningful and trustworthy figure.
- 7.15 It was also noted by this respondent that there is precedence for using a 10 year figure in the PCDM (in calculating the Net Capex driver); therefore they are happy for a similar methodology to be used when calculating the allocation of costs and customer contributions to network tiers.
- 7.16 A DNO respondent explained that they agree that it is appropriate to utilise the average of the data available over the ten year period (2005/06 to 2014/15) within the FBPQ LR1 submissions, as this would help ensure that single year data volatility is removed as the costs are smoothed over the longer time window.

Question 6 – Do you agree with the approach proposed to allocate customer contributions that are in excess of connection costs?

- 7.17 The Working Group noted that the majority of respondents agreed with the approach set out under this solution.

- 7.18 An IDNO respondent explained that contributions that are in excess of connection costs are revenue stream for DNOs and therefore need to be allocated (rather than ignored as is currently the case). Table LR1 identifies that these “excess” contribution largely relate to the indirect costs [of providing a connection]. Allocating this revenue to network tiers using the Opex driver is consistent with the way that other indirect costs are allocated.
- 7.19 A DNO respondent explained that they believe that the approach proposed for the allocation of these contributions by the use of the Opex cost driver is appropriate.

Question 7 – Do you have any comments on the impact analysis presented within Attachment C?

- 7.20 A DNO respondent explained that in all but one of the DNOs the affected tariffs are those that we would expect to see change if the objectives of the proposal are to be met. This suggests that, the progression of this proposal does have some merit.
- 7.21 An IDNO respondent noted that across the 14 regions, the impact on the All The Way (ATW) charge is negligible, with any changes (+0.1%) primarily due to rounding rather than a genuine change in the charge. The impact to the customer will therefore be negligible, with the only real change being in the charges to LDNOs connecting to the DNOs, due to the correction in the defect identified by this CP.

Question 8 – Are there any alternative solutions or matters that should be considered by the Working Group?

- 7.22 The Working Group noted that the majority of respondents did not offer any alternative solutions to be considered by the Working Group.

Question 9 – The Working Group is proposing an implementation date of 01 April 2015, or where this is not possible, under the notice periods required under DCUSA, the earliest date that the notice periods under DCUSA permit for changes to such charges; do you agree with this date?

- 7.23 The Working Group discussed the responses to this question, and noted that to meet the deadlines for an April 2015 implementation date would now be impossible to realise. Given these circumstances, the Working Group recommends an April 2016 implementation.

8 ASSESSMENT AGAINST THE DCUSA OBJECTIVES

8.1 The majority of the Working Group considers that the following DCUSA Objective is better facilitated by DCP 117:

- **General Objective 1²** - Better Facilitated.
- **General Objective 2³** – Better Facilitated.
- **General Objective 3⁴** – Better Facilitated.
- **Charging Objective 1⁵** - Better Facilitated.
- **Charging Objective 2⁶** - Better Facilitated.
- **Charging Objective 3⁷** – Better Facilitated.

8.2 This change proposal addresses defects in the PCDM used to calculate discount factors applied to upstream DNOs' ATW tariffs in determining the tariffs that should apply to network operators who connect to their distribution system at LV.

8.3 The DUoS margin available to a licensed distributor connecting to another distributor operating within its distribution services area is the difference between the upstream distributor's ATW DUoS charges to the end customer and the upstream distributor's DUoS charge to the downstream distributor. If the charge to the downstream distributor is not reflective of the total costs then a margin squeeze may result which could have the effect of restricting, distorting or preventing competition.

8.4 The Working Group reached the agreement that DCP 117 better facilitates DCUSA General Objective 1, 2 and 3, and DCUSA Charging Objectives 1,2 and 3.

² The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks

³ The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity

⁴ The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences.

⁵ that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence

⁶ that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)

⁷ that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business

9 IMPLEMENTATION

- 9.1 DCP 117 is classified as a Part 1 matter in accordance with Clause 9.4.2 (B) of the Agreement, and therefore will go to the Authority for determination after the voting process has completed.
- 9.2 The implementation date, subject to Authority approval, is April 2016. However, once approved this CP should be reflected in the indicative prices set by DNOs in December 2015.

10 FINAL CONCLUSIONS ON DCP 117

- 10.1 The Working Group's conclusion, reflecting Party opinion as presented in the Consultation responses, is that the proposed legal drafting meets the intent of DCP 117.

11 ENGAGEMENT WITH THE AUTHORITY

- 11.1 Ofgem has been engaged throughout the progression of DCP 117 as an Observer of the Working Group.

12 IMPACT ON GREENHOUSE GAS OMISSIONS

- 12.1 No material impacts on greenhouse gas emissions from the implementation of this CP have been identified.

13 PANEL RECOMMENDATION

- 13.1 The DCUSA Panel approved the DCP 117 Change Report at its meeting on 20 May 2015.
- 13.2 The timetable for the progression of the Change Proposal is set out below:

Activity	Date
Change Report approved by DCUSA Panel	20 May 2015
Change Report Issued for Voting	22 May 2015
Party Voting Closes	15 June 2015
Change Declaration Issued	17 June 2015
Authority Decision	22 July 2015
Implementation	1 April 2016

- 13.3 Parties are invited to vote using the form provided as Attachment 6.

14 ATTACHMENTS:

- Attachment 1 – DCP 117 Change Proposal
- Attachment 2 - DCP 117 Draft Legal Text
- Attachment 3 – DCP 117 Request for Information
- Attachment 4 – DCP 117 Consultation – August 2012
- Attachment 5 – DCP 117 Consultation – October 2014
- Attachment 6 – DCP 117 Voting Form