






DCUSA Change Declaration		At what stage is this document in the process?
<div>DCP 281and DCP 281A</div> <div>Changes to Schedule 19 – Portfolio Billing:</div> <div>Raised on the 14 September 2016 as a Standard Change</div>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<div>Purpose of Change Proposal</div> <div>DCP 281 seeks to ensure that HH Portfolio data is reported to DNOs in a consistent manner by all embedded LDSOs and to define how revised data must be reported.</div>		
<div></div>	<div>The DCUSA Parties determined that these Change Proposals should <u>not</u> be implemented.</div> <div>DCUSA Parties voted on DCP 281 and recommend:</div> <div><div><div></div></div><div><div>that the change solution is rejected</div><div>that the implementation date is accepted</div></div></div> <div>DCUSA Parties voted on DCP 281A and recommend:</div> <div><div><div></div></div><div><div>that the change solution is rejected</div><div>that the implementation date is accepted</div></div></div> <div>The DCUSA Parties consolidated votes are provided as Attachment 1.</div>	
<div></div>	Impacted Parties: DNOs and IDNOs	
<div></div>	Impacted Clauses: Schedule 19	

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## Timeline

The timetable for the progression of the CP is as follows:

### Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	21 September 2016
Consultation Issued to Industry Participants	28 October 2016
Change Report Approved by Panel	18 January 2017
Change Report issued for Voting	20 January 2017
Party Voting Closes	10 February 2017
Change Declaration Issued to Parties	14 February 2017
Implementation	01 April 2017

## 1 Summary

### What

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This CP seeks to ensure that HH Portfolio data is reported to Distribution Network Operators (DNOs) in a consistent manner by all Embedded Distributor Network Operators (EDNOs) and to define how revised data must be reported.

### Why

- 1.3 This change will introduce a standard approach for submission of HH Portfolio data and provide clarity of how revised data is submitted to the DNO. This standard approach will benefit all parties in managing this work.

### How

- 1.4 By modifying the legal text to provide clarity of how revised data is submitted to the DNO and the introduction of a template to be used by EDNOs to provide HH Portfolio data to DNOs.

## 2 Governance

### Justification for Part 2 Matter

- 2.1 DCP 281 has been classed as a Part 2 Matter therefore, Authority consent is not required.
- 2.2 DCP 281 does not meet the criteria for a Part 1 Matter.

### Requested Next Steps

- 2.3 DCUSA Parties voted that DCP 281 be rejected. DCUSA Parties voted that DCP 281A be rejected.

## 3 Why Change?

### Background of DCP 281

- 3.1 Schedule 19 '*Portfolio Billing*' states that '*The Embedded Distribution Network Operator (EDNO) shall provide a report to the DNO Party, on or before the 15th day of each month*' including any adjustments to data previously reported.
- 3.2 With the number of Embedded Distribution Network Operators (EDNOs) increasing, DNOs are receiving data reported in different permutations, particularly for credit/rebill situations.
- 3.3 This CP has been raised by UK Power Networks and seeks to ensure that HH Portfolio data is reported to DNOs in a consistent manner by all EDNOs and to define how revised data must be reported.

## 4 Solution

### DCP 281 Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 281. This Working Group consists of DNO, IDNO and Ofgem representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).
- 4.2 This change proposes to modify Schedule 19 Section 3 to provide clarity and consistency of how data is submitted to the DNO. A spreadsheet template has been developed to be used by EDNOs to provide HH Portfolio data to DNOs. This proposed template spreadsheet provides a consistent format to aid EDNOs in meeting their reporting requirements and for DNOs to receive the data for processing and acts as Attachment 5.
- 4.3 The Working Group carried out a consultation to obtain views on the proposed approach to populating this report template and changes to the legal text in Schedule 19.

### DCP 281 Consultation

- 4.4 The Working Group carried out a consultation (Attachment 4) to give DCUSA Parties and other interested organisations an opportunity to review and comment on the proposed DCP 281 solution.
- 4.5 The Working Group wished to clarify the approach taken to the population of the spreadsheet on the following items:
  - whether multiple MPAN(s) or a lead MPAN for each invoice is reported in the proposed template;
  - whether five (red, amber, black, yellow, green) columns for the block units or three (red or black, amber or yellow, green) columns for the block units be provided in the template;
  - If any item is not billed for a particular customer should a zero value be populated in the relevant column or the field be left blank; and
  - In the instance of a credit rebill, two separate lines should be shown, with one being the negative value of the amount being credited and the other being the new invoice. Any

rebilling is to be provided in the same report as the HH Specific Portfolio data to avoid any impact in terms of processing the data.

4.6 There were seven responses received to the consultation. Five respondents were DNOs and two respondents were IDNOs. The Working Group discussed each response and its comments are summarised alongside the collated consultation responses in Attachment 4.

4.7 A summary of the responses received, and the Working Group's conclusions are set out below:

### Question 1: Do you understand the intent of the DCP 281?

4.8 All respondents understood the intent of the CP.

### Question 2: Are you supportive of the principles of the DCP 281?

4.9 All respondents to this question were supportive of the principles of the CP.

### Question 3: Do you consider that this change should not be designated as a Part 2 matter?

4.10 All respondents considered that this change should be designated as a Part 2 Matter.

### Question 4: Would you rather include three (red or black, amber or yellow, green) or five (red, amber, black, yellow, green) columns for the block units? Please provide your rationale inclusive of any financial, resource or system impact or restriction.

4.11 Four respondents had a preference for three columns for the block units in the template and provided the following rationale for their decision:

- *"We would prefer to retain 3 columns for the unit rates as this matches our existing bill calculation template. It is also a simpler approach with less room for error - for example data is less likely to be placed in the wrong column if there are only 3 options rather than 5".*
- *"Reporting on five columns instead of three is an 'additional' change to the core intent of introducing consistency in to the current format report format. This could potentially introduce additional impact on parties. Reporting 5 columns would have system impacts ..... and associated development costs (not yet known)."*
- *"We would prefer three columns for the block units as this matches the current functionality within our existing billing system. Moving to five columns would result in additional costs in the region of £3k to £11k for no real benefit".*

- *“This layout has less risk for both the IDNO and the DNO, since there are only 3 columns to populate. There is more chance of human error when having to decide between 5 columns. Billing applications are set-up to send and receive data in 3 columns”.*
- *“Three columns are preferable in our view. The template used to import data into our billing system currently uses three, so would require minimal changes”.*

4.12 Two respondents preferred five columns for the block units in the template and provided the following rationale for their decision:

- *“We believe that for clarity and completeness that 5 columns for red, amber, black, yellow and green should be included within the template. We do not see any financial, resource or system impact”.*
- *“Our billing system currently provides the data in five columns for the block units. We have been advised that changing the column structure to using three columns will require changes to the structure of the database tables, objects classes using the tables, stored procedures, output functionality and updates to historical data to line up with the new format. This work has been costed at c£15k and will take several months to implement. In view of the cost and resource issues we would rather include five columns for the block units as is currently the situation. We also do not believe that changing to three columns has any benefit”.*

4.13 The Working Group discussed the responses and agreed with the majority of respondent’s view that three columns for the block units should be included in the report template.

**Question 5: Do you agree that where an invoice does not include data that would fall into a given column of the report, a zero value should be provided? Please provide your rationale inclusive of any financial, resource or system impact or restriction.**

4.14 The Working Group noted that all respondents considered that a zero value should be given in a column of the report that does not include data. No financial, resource or system impact or restriction was identified by the introduction of this rule to the population of the report template.

4.15 The mandating of a zero value where no data is included will ensure that no columns are overlooked and help prevent data accidentally being omitted as all columns will be required to be populated thus preventing validation failures. It will also ensure a consistent approach in both the delivery and processing of the data.

**Question 6: Do you agree that in the instance of a credit rebill, two separate lines should be shown: one being the negative value of the amount being credited and the other being the new invoice as per the example in Appendix 1 of the Change Proposal? Please provide your rationale inclusive of any financial, resource or system impact or restriction.**

4.16 All respondents agreed that in the instance of a credit rebill, two separate lines should be shown, one being the negative value of the amount being credited and the other being the new invoice. Respondents did not identify any financial, resource or system impact or restriction from this amendment.

- 4.17 Two respondents highlighted that this amendment is also consistent with the Company/User credit/rebill arrangements under 21.2C (Section A).

### Question 7: Do you have a preference whether multiple MPAN(s) or a Lead MPAN for each invoice is reported in the proposed template? Please provide your rationale

- 4.18 The Working Group noted that there was a split among respondents on whether the EDNO should send multiple MPAN(s) or a Lead MPAN for each invoice that is reported.
- 4.19 Two respondents who preferred that Multiple MPANs for each invoice be reported advised that:
- *“We would prefer all MPANs to be listed rather than a lead MPAN as this allows us to match the individual MPANs back to the MPAN Report from ECOES to highlight if any are missing, rather than simply carrying out a check on the overall number of MPANS”.*
  - *“The multiple MPANS should be shown grouped in one cell within the template in order to maintain a standard approach for reporting the data. If this is the case, then we are happy with that approach. The DCUSA has a requirement to provide a HH MPAN report (Clause 4 of Schedule 19). Therefore, if the invoice does not list all MPANS then the intended control is missing”.*
- 4.20 Two respondents who preferred that a Lead MPAN for each invoice be reported advised that:
- *“Our preference is to use the ‘lead MPAN’ for an invoice when a site contains multiple MPANs. Our system currently displays one MPAN per invoice for HH IDNO billing. In moving to displaying all MPANs per site on the invoice, would result in a change to the current software with associated costs being in the region of £11k”.*
  - *“Lead MPAN – providing all data is presented against this MPAN”.*
- 4.21 Three respondents did not have any incidences of related MPANs on their network and so did not have a preference on the approach taken.
- 4.22 The Working Group discussed the responses. Some Working Group members considered that multiple MPANs for each invoice should be reported by EDNOs to act as a validation control. It will allow DNOs to check that they have received a complete and correct data set to bill on.
- 4.23 Other Working Group members considered that the addition of a column for EDNOs to list Multiple MPANs in the report template would be adding an extra manual element to the process as DNOs would need to manually remove this column before processing the report in their billing system. Following a vote, the Working Group agreed by simple majority that a lead MPAN for each invoice be reported in the proposed template.

### Question 8: Do you have any comments on the proposed legal text?

- 4.24 The Working Group updated the legal text to reflect the following points made by respondents:
- *“In paragraph 3.2, the word ‘should’ could be replaced with ‘shall’. The text is also introducing 5 columns instead of 3 (contrary to question 4)”;*
  - *“The unit kVA is incorrectly written”;*

- *“There is an inconsistency in paragraph 3.2, instead of using the acronym ‘IDNO’, ‘EDNO’ should be used as per the rest of the schedule”; and*
- *“In paragraph 3.3, point g, please can the (s) from month(s) be removed as this gives a clear indication that the invoice only covers one month rather than inferring it can cover multiple months. In addition to this please can the year be included in order to remove any potential ambiguity”.*

### Question 9: Do you have any comments on the proposed template?

- 4.25 Three respondents referred to their preferred number of reporting columns for block units in the reporting template which was addressed in question 4.
- 4.26 One respondent requested an actual example of how a credit/rebill be included in the report to improve the usefulness of the Appendix. It was suggested that this would provide a similar approach to Elexon’s Market Domain Data Hand Book.
- 4.27 Another respondent requested that the template be amended to replace IDNO with EDNO.
- 4.28 The Working Group agreed to replace IDNO with EDNO in the proposed template and provide an example to prevent Parties interpreting the population of the template differently.

### Question 10: Can you please provide a lead time for the implementation of this change?

- 4.29 The majority of respondents advised that the length of lead time required to comply with this change was dependent on whether the Working Group chose to include three or five columns for the block units in the reporting template which is specific to which format their billing systems is currently set up to process.
- 4.30 The Working Groups noted that their agreed way forward is for the reporting template to contain three columns for the block units. The longest lead time proposed for the three columns solution was 12 weeks. This respondent clarified that a manual process could be in place immediately and that the 12 week lead time is based on full automation of the process.
- 4.31 The Working Group considered the responses and agreed a 01 April 2017 implementation date which provides Parties with over two months lead time to implement the necessary changes required.



### Question 11: Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.

1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.
2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity.
3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.
4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.
5. Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

4.32 The following table provides a summary of the responses to this question.

Respondent Party Type	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
<b>DNOs</b>	0	0	1	5	0
<b>IDNO</b>	0	0	0	2	0
<b>Total</b>	0	0	1	7	0

4.33 All respondents considered that General Objective 4 was better facilitated by this change for the following reasons:

- *“it will provide consistency in the way that data is sent, allowing DNOs to process this data more efficiently”.*
- *“as all IDNOs will have to adhere to a set template when providing HH portfolio data to DNOs, thus promoting efficiencies”.*
- *“the introduction of this change will provide a clear defined method to provide HH Portfolio data to the DNO”.*
- *“as significant improvements in the efficiency of billing arrangements between distributors would be achieved”.*

- 4.34 One respondent considered that General Objective 3 was also best facilitated by this change.
- 4.35 The Working Group noted the responses and agreed that General Objective four was better facilitated by this change. Please refer to Section 7 of this report for the Working Groups rationale on why Objective 4 is better facilitated by this CP.

### **Question 12: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

- 4.36 All respondents were not aware of any wider industry developments that would impact upon this CP.

### **Question 13: Are there any alternative solutions or matters that should be considered by the Working Group?**

- 4.37 All respondents did not have any alternative solutions or matters that should be considered by the Working Group.

### **Question 14: It is proposed that DCP 281 be implemented in the next DCUSA Release following Approval. Do you agree with the date that DCP 281 is to be implemented into the DCUSA?**

- 4.38 Five respondents agreed with an implementation date of the 29 June 2017. Two respondents highlighted that lead time would be required to implement the necessary adjustments to their billing systems to comply with the requirements of this change.
- 4.39 The Working Group considered the responses to this question and question 10 and agreed to propose an implementation date of the 01 April 2017 for this change.

## **Working Group Conclusions**

- 4.40 The Working Group reviewed each of the responses received to consultation one and concluded that all of the respondents understood the intent of DCP 281.
- 4.41 The Working Group agreed that all respondents were supportive of the principle of the CP.
- 4.42 The Working Group noted that the majority of respondents felt that specifically DCUSA General Objective 4 was better facilitated by this change.
- 4.43 The Working Group concluded that as the template will be mandated to be used by EDNOs for the submission of their HH portfolio data to DNOs, it will provide a defined method ensuring a consistent approach to submitting data. This will increase the efficiency of DNOs processing the data and as a result increase the efficiency of the billing arrangements that sit under DCUSA.

## **Alternate Change Proposal**

- 4.44 Following the Working Group's discussions one member decided to raise an alternate CP. The sole reason for this was that they believed that the current requirement in DCUSA – to send an MPAN listing – was preferable to sending a “lead” MPAN.

- 4.45 The rationale for preferring this was that the DNO uses the MPAN listing in the billing report to validate that it has received all relevant data by comparing it to the HH MPAN report that is also provided by the EDNO. Under the Working Group's proposed solution, if two or more MPANs are combined onto one invoice and then the invoice data provided by the EDNO only quotes a "lead" MPAN, then the DNO cannot validate that it has received all relevant billing data as one or more HH MPANs will not be included in the billing report, but will be included in the HH MPAN report.

## 5 Relevant Objectives

### Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. There are five General DCUSA Objectives. The full list of objectives is documented in the CP form provided as Attachment 3.
- 5.2 The Working Group considers that the DCUSA Objective 4 is better facilitated by DCP 281 and DCP 281A. The reasoning against this objective is set out in the table below:

Impact of the Change Proposal on the Relevant Objectives:	
Relevant Objective	Identified impact
<b>General Objective 4</b> - The promotion of efficiency in the implementation and administration of this Agreement	This objective will be better facilitated as the introduction of this change will provide a clear defined method to provide HH Portfolio data to the DNO.

## 6 Impacts & Other Considerations

- 6.1 This change impacts IDNOs and DNOs as it introduces a consistent way for EDNOs to report HH Portfolio data to DNOs on a template spreadsheet. It is proposed that an obligation is placed on EDNOs to use this template for reporting purposes and that the template is placed under DCUSA governance as an Appendix to Schedule 19.
- 6.2 Parties were asked to identify any financial, resource or system impact or restriction introduced by this change in the consultation to ascertain the magnitude of this change on party systems. The questions where Parties reported an impact were questions four and seven of the consultation.

### Question 4

- 6.3 The majority of respondents billing systems were set up to process a reporting template with three columns for the block units which is the Working Group recommended approach. Of those respondents who preferred the reporting template to include five columns for the block units, only one IDNO respondent provided a system impact cost (£15k). The respondent noted that it would take several months to adjust their billing systems for automated processing. On discussion of the implementation date which the respondent attended, it was agreed that this change could be implemented on the 01 April 2017 as a manual process could be put in place in the interim period.

### **Question 7**

- 6.4 The Working Group agreed by simple majority that their preferred approach is for a lead MPAN per invoice rather than multiple MPANs per invoice be included in the template. One consultation respondent advised that in moving to displaying all MPANs per site on the invoice, would result in a change to the current software with associated costs being in the region of £11k. It is noted that the existing legal text requires Parties to report multiple MPANs. Parties should already be compliant with the existing legal text and therefore retaining the requirement to report on multiple MPANs should not introduce any further cost to Parties.

### **Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

- 6.5 n/a

### **Consumer Impacts**

- 6.6 The Working Group did not identify any consumer impacts introduced by this change.

### **Environmental Impacts**

- 6.7 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 281 or DCP 281A were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

### **Engagement with the Authority**

- 6.8 Ofgem has been fully engaged throughout the development of DCP 281 and DCP 281A as a member of the Working Group.

## **7 Implementation**

- 7.1 The proposed implementation date for DCP 281 and DCP 281A is 01 April 2017.

## **8 Legal Text & Report Template**

- 8.1 The proposed DCP 281 and DCP 281A legal texts have been reviewed by the DCUSA Legal Advisor and acts as Attachment 2.

### **Legal Text**

- 8.2 Schedule 19 sets out the process for determining the data by reference to which the Use of System Charges payable by the EDNO to the DNO Party are to be calculated. Section 3 'HH Specific Data' sets out how to calculate the Use of System Charges attributable to the EDNO's site specific

half-hourly-settled Connectees. The DNO Party uses data contained in the report provided by the EDNO to undertake this calculation.

8.3 This change proposes to modify Schedule 19 Section 3 to provide clarity and consistency of how data is submitted to the DNO as set out below;

- Wording added to Clause 3.2 – *“Where revised data is received by the EDNO and rebilled, a credit row and new debit row should be reported”*. In the example spreadsheet template a credit re-bill is displayed using two separate lines, the first line shows the negative value of the invoice and the second line shows the new invoice.
- Clause 3.3 lists the data items to be included in respect of each invoice raised on a HH settled connectee. A new data item of ‘*an MPAN count*’ is proposed to be added to allow the reconciliation of the MPANs being billed against the registration data.
- Clause 3.3 – list items j to n requires that the EDNO provides the units (in kWh) used covered by the invoice against the DNO Party’s relevant timebands. In the spreadsheet template, it is proposed to set out three (red or black, amber or yellow, green) columns for the block units.
- Clause 3.4 is modified to require EDNOs to use the DCP 281 template spreadsheet which is proposed to be inserted as Appendix A to Schedule 19 and report all data within the same tab. The wording *“Where any data item was not present or had a value of zero in the invoice raised, the report shall show zero for that data item”* is introduced in reference to the population of the proposed template.
- Clause 4.2 has been introduced to reflect the approach taken for HH Site Specific Data in Clause 3.4 in the MPAN Report. In Clause 4 the wording proposed is *“Where there are no half-hourly-settled Connectees, the EDNO shall submit a nil return”*.

#### **Alternate Legal Text**

8.4 The alternate CP’s legal text varies from the legal text developed by the Working Group in retaining the MPAN listing rather than introducing the concept of a lead MPAN. The existing DCUSA wording is unchanged but the wording *“a list of the MPANs covered by the invoice”* moves to sub-paragraph (f) as a consequence of a new sub-paragraph (e) being inserted.

#### **Spreadsheet Template**

8.5 The proposed approach to the population of the spreadsheet template is set out below:

- It is proposed that the Excel front sheet is the Actual Consumption Month for DNO reporting purposes and that all data is reported within the same tab.
- It is highlighted that under Clause 3.3, the data items are provided on an invoice level rather than on MPAN level. If you have a combined site with multiple MPANs then the DNO would expect to receive one row of collated data with a lead MPAN per invoice rather than separate rows of data per MPAN.
- The credit re-bill data is displayed using two separate lines, the first line shows the negative value of the invoice and the second line shows the new invoice.
- Under existing list items j to n five (red, amber, black, yellow, green) columns for the block units are provided in the draft legal text. It is proposed that this approach is simplified to three (red or

black, amber or yellow, green) columns for the block units. Also a physical example has been developed to aid parties populating the template and prevent misinterpretation.

- If an item is not billed for a customer, insert zero values in to the relevant field.

#### **Alternate Spreadsheet Template**

- 8.6 The alternate CP's proposed template differs from the Working Group's proposed template in that it allows for the reporting of all MPANs on the site being invoiced as a list in a single cell per invoice.
- 8.7 The proposed template spreadsheets act as Attachment 5. If this CP is approved, the relevant template spreadsheet will be published on the DCUSA website to act as reference material for Parties on how to populate the spreadsheet.

## **9 Voting**

- 9.1 The DCP 281 and DCP 281A change report was issued to DCUSA Parties for Voting on 20 January 2017.

### **DCP 281 and DCP 281A – Recommendation**

#### **DCP 281A**

##### **Part 2 Matter**

##### **Change Solution – Reject**

- 9.2 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the proposal was less than 65% of the total number of Groups in that Party Category which voted; and
- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the proposal was less than 65%.

##### **Implementation Date – Accept**

- 9.3 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the implementation date was more than 65% of the total number of Groups in that Party Category which voted; and
- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 65%.

#### **DCP 281A**

##### **Part 2 Matter**

##### **Change Solution – Reject**

- 9.4 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the proposal was less than 65% of the total number of Groups in that Party Category which voted; and

- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the proposal was less than 65%.

#### **Implementation Date – Accept**

9.5 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the implementation date was more than 65% of the total number of Groups in that Party Category which voted; and
- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 65%.

## **10 Recommendations**

### **DCUSA Parties Recommendation**

DCUSA Parties recommend:

For DCP 281:

- that DCP 281 should not be implemented
- that DCP 281 does not better facilitate the Relevant Objectives

For DCP 281A:

- that DCP 281A should not be implemented
- that DCP 281A does not better facilitate the Relevant Objectives

### **Attachments**

- Attachment 1 – Consolidated Responses
- Attachment 2 - DCP 281 Draft Legal Text
- Attachment 2 – DCP 281A Draft Legal Text
- Attachment 3 - DCP 281 Change Proposal
- Attachment 3 – DCP 281A Change Proposal
- Attachment 4 - DCP 281 Consultation Documents
- Attachment 5 – DCP 281 Proposed Template
- Attachment 5 – DCP 281A Proposed Template