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DCUSA Request for Information (RFI)

DCP 268 'DUoS Charging Using HH Settlement Data'

1 PURPOSE

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.

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1.2 This document is a Request for Information (RFI) issued to all DCUSA Parties and the Authority in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 268 'DUoS Charging Using HH settlement data'.

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~~1.2.1.3~~ The purpose of this document is seeking to clarify and confirm the best option on the IT solution for this Change Proposal. This will also determine whether there is a requirement for a BSC change to be raised.

~~1.3.1.4~~ Parties are invited to consider the questions set out in section 3 below and submit comments using the form attached as Attachment to dcusa@electralink.co.uk by ~~16 September~~ 30 August 2016.

Commented [OC1]: Suggest that this date is pushed back until middle of September due to holidays and so all can respond.

~~1.4.1.5~~ Respondents are advised to note that the meeting papers for DCP 268 Working Group meeting are available on www.dcusa.co.uk.

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2 DCP 268 'DUOS CHARGING USING HH SETTLEMENT DATA-RESOLVING'

2.1 DCP 268 seeks to facilitate a transition to half-hourly (HH) settlement for non-half hourly (NHH) customers by moving to a Distributor time band charging basis using the profiled HH consumption values. This will mean that the DUoS tariff rates and structures are identical regardless of the basis of settlement.

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2.2 The Working Group undertook a consultation associated with this Change Proposal. One of the questions was whether there was a preference for Exelon (via the Supplier Volume Allocation Agent (SVAA)) to provide the pseudo-split of consumption data in to the distribution time band or whether they required Parties to undertake the relevant work on their internal and billing systems. ~~2~~ The response is shown below.

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Insufficient Information	Exelon (SVAA)	Distributors	No comment

2 - Suppliers	4 - DNOs, 1 IDNO, 6 Suppliers	2 - DNOs 1 - S upplier	1 – Anonymous 1 - Elexon
2	11	3	2

2.3 The Working Group concluded that based on the responses received, and even though there was significant support for the centralised approach, there may have been insufficient detail provided in the consultation to allow Parties to determine whether it was more beneficial for Elexon to provide the pseudo-split of consumption data in to the distribution time band or for Parties to undertake the relevant work on their internal and billing systems. The Working Group agreed to carry out a Request for Information (RFI) for an impact assessment based on a set of proposed options. This document sets out in detail those options being considered by the Working Group and seeks industry views on the suitability of the approaches proposed and which is their preferred option.

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2.4 As stated in the previous consultation there are two main options for consideration namely the centralised option (where the work is undertaken by Elexon / SVAA or the Party DNO Distributor option. However, within each option there are four a number of options for the way in which the data is dealt with. grouped. There are also two options within the Party option for splitting data into time bands. Under all options, Distributors will be required to make changes for billing and Suppliers may need to make system changes for validation purposes.

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Centralised Approaches Options for Grouping of Data

2.5 Under current arrangements, the NHH and HH data collectors provide aggregated data to the SVAA. The following data is received by the SVAA via the D0041 data flow, the description of the flow contains: ~~D~~ details of NHH Consumption per Supplier aggregated per GSP Group by Profile Class (PC), Line Loss Factor Class (LLFC) and measurement requirement which includes the Standard Settlement Class (SSC) and Time Pattern

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Commented [LW3]: AE - Not sure what the measurement requirement is

Commented [OC4]: Agreed, not a term I have come across before, is this correct?

Regime (TPR). The SVAA then ensures that the data goes to relevant supplier and distributor on the D0030 flow – ‘Aggregated DUoS Report’.

2.6 It is the LLFC/SSC/TPR/PC settlement combination that is being affected by this CP. For ease of reference, the options below will refer to the data items that make up the combination as “settlement combinations”.

2.7 The approach introduced to the Balancing and Settlement Code (BSC) by It is Under P300¹ the framework introduced to the One proposal ised that the framework introduced by the Balancing and Settlement Code (BSC) under P300² could be extended for DCP 268, which involves creating pseudo data within the D0030³ data flows and providing them to the respective Distributor and Supplier to support the DUoS charging of the aggregated tariffs. Attached as appendix xx is the implementation document for P300 that contains the activities undertaken by the SVAA and Distributors in providing pseudo SSC/TPR combinations.

2.8 Under P300 Distributors created pseudo SSCs and TPRs linked to the distribution time band and created new line loss factor classes (LLFCs). The Working Group has considered the potential impact of creating new LLFCs which may result in significant volumes of movement from one LLFC to another as a consequence of this CP. Consideration may need to be given to creating pseudo LLFCs by Distributors and Elexon.

2.9 The level of granularity of data (segregated HH and NHH data) received via the D0030 data flow increases from Option 1a -1d. Option 1A creates 8 x 3 x48 records plus headers (7 additional aggregations), option 1b (9 additional aggregations) whilst option 1C 18x3x48 records plus headers (18 additional aggregations) (Please see Attachment 1).

2.7.2.10 You get more transparency going down the options but the benefit is vers us is the number of aggregations you need to put on the D0030.

2.8.2.11 For the centralised approach (as undertaken by Elexon) to provide the pseudo split of consumption data, a change to the BSC would need to be raised with a list of

¹ P272 – ‘Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes’ (DCP179)

² P272 – ‘Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes’ (DCP179)

³ D0030 Aggregated DUoS Report

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detailed changes required to the SVAA in order to populate the D0030 dataflow. The Working Group reached the view that there are four options under the centralised approach; further details of three of the options are contained in Attachment 2 due to the more complex nature of the changes required, whilst the fourth is simpler to explain as shown below. For each option an example of Supplier X in GSP Group_A is used and all the existing settlement combinations that would appear on the D0030 by the new tariff allocation are colour coded. At the bottom of the data of each sheet it shows how the different colours map to the additional aggregations based on each type of option of the centralised approach.

2.92.12 The four variants to the Centralised approach Option 1 are as follows:

- 2.13 Option 1a – aggregate the settlement combinations to the proposed new Distribution tariffs.
- 2.14 Option 1b – aggregate the settlement combinations to the proposed new Distribution tariffs but sub-divide the LV Domestic Aggregated tariff by HH aggregation and NHH aggregation and separate the non-domestic aggregated tariffs by NHH and HH.
- 2.15 Option 1c – aggregate the settlement combinations by HH aggregation and NHH profiles (PC1-8 and maintain the difference between metered and unmetered profiles).
- Option 1d – retain the existing settlement combinations but replace the TPR of each combination with the distributor time band TPRs.

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2.10 — In summary the effect of each option on what the SVAA receives and then sends out to each Supplier and Distributor based on the settlement combinations for GSP_A in the attachment is as follows:

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<p>2.16</p>	<p>SVAA settlement combinations received</p>	<p>SVAA settlement combinations it sends out on D0030</p>	<p>comments</p>
<p>Option 1a</p>	<p>161</p>	<p>7</p>	<p>Likely to need to create new LLFCs and use of PC O, Puesdo SSC, psuodo TPR</p>
<p>Option 1b</p>	<p>161</p>	<p>9</p>	<p>Retain the current mapping for HH aggregation tariffs and aggregate the NHH settlement combinations to the seven tariffs. Likely to need to create new LLFCs and use of PC O, Puesdo SSC, puesdo TPR</p>

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Option 1e	161	16	May need to create new LLFCs, retain PC and use pseudo-SSC and pseudo TRP
Option 1d	161	161	Only change is the distributor TPR instead of the TPR received
Option 2	161	161	No change

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Option 1a

2.14.17

This option aggregates the data to the proposed new tariff structure and completely ignores the existing settlement combinations. In doing so the LV Domestic Aggregated tariff would combine both HH Aggregated on Measurement Class F and NHH Aggregated data on some of the current settlement combinations identified in attachment 2. Similarly, for LV Non Domestic Aggregated on Measurement Class G. The advantages and disadvantages of this option are set out below:

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Pros	Cons
Aligns with the distributor tariffs	De-links in its entirety from the settlement combinations the by losing transparency of the data received on the D0041
Biggest reduction in the size of the D0030 file	Mixes actual HH consumption data with HH profiled data

Commented [LW7]: What about potential double-charging and not billing invalid combinations?

AE - this is now an issue for options 2a-2c

(a pproximately one tenth existing file size)	
Both suppliers and distributors receive the same data	A need to retain the existing LLFCs to match the settlement combinations and create new ones <u>pseudo?</u> used for billing.
	<u>We will need to populate the profile class field with a pseudo profile class in the D0030 dataflow. This will introduce complexity and could cause validation issues.</u>
	Fundamental change to the <u>data contained in way in which the D0030 data flow is structured</u> requiring central, <u>DistributorNO</u> and <u>Ssupplier</u> system changes.

Option 1b

2-122.18

This is the same as option 1a but has a sub-division of data associated with the LV Domestic Aggregated tariffs for Domestic and LV Non-Domestic Aggregated tariffs by keeping the NHH data set separate to the new aggregated HH data for Measurement Classes F and G. The advantages and disadvantages of this option are set out below:

Pros	Cons
Retains the split of HH aggregation and NHH aggregation linked to the new tariffs	De-links in its entirety from the settlement combinations thereby losing transparency <u>to of</u> the data received on the D0041
Second biggest reduction in the size <u>of</u> the D0030 file <u>(a pproximately 10 -15% of the existing file size)</u>	A need to retain the existing LLFCs to match the settlement combinations and create new ones used for billing.
Both suppliers and distributors receive the same data	<u>Fundamental change to the data way in which contained in the D0030 data flow is structured</u> requiring central, <u>DistributorNO</u> and <u>Ssupplier</u> system changes.
	<u>We will need to populate the profile class field with a pseudo profile class in the D0030 dataflow. This will introduce complexity and could cause validation issues.</u>
	<u>Fundamental change to the way in which the D0030 is structured requiring central, DNO and supplier system changes.</u>

Option 1c

2-132.19

This aggregates to each tariff by profile class combinations and retains the separation for the new aggregated HH data for

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Measurement Classes F and G. The advantages and disadvantages of this option are set out below:

Pros	Cons
Retains the split of HH aggregation and NHH aggregation linked to the new tariffs	De-links in its entirety from the settlement combinations thereby losing transparency of the data received on the D0041
Third biggest reduction in the size of the D0030 file (approximately 20 -25 % of existing file size)	A need to retain the existing LLFCs to match the settlement combinations and create new ones used for billing-
Pros	Cons
Both suppliers and distributors receive the same data	
Provides added transparency at profile class level	
Closest to the 'status quo', so likely to have lowest implementation cost	
This option does not require the introduction of a pseudo profile class.	

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Option 1d

2.142.20 This retains the existing settlement combinations apart from the TPR which is replaced by the distributor pseudo TPRs.

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Pros	Cons
Retains each settlement combination apart from the TPR	Loses some transparency of the data received on the D0041
Both suppliers and distributors receive the same data	A need to retain the existing LLFCs to match the settlement combinations and create new ones used for billing-
Likely to be a simpler change than options 1a, 1b and 1c	No difference in the size of Potential expansion of the D0030 file (expected increase is 33%)
Closest to the 'status quo', so likely to have lowest implementation cost	
Replicates what the distributor would do under option 2 but provides the data centrally prior to billing so that validation of the DUoS bill is simpler.	Will need to create pseudo TPRs for Black Amber Green for mapping UMS tariffs

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Centralised or Party Approaches-Option

2.152.21 Currently most ~~Distributors~~~~DNOs~~ utilise the TPR of the supply tariff to determine the units to be charged under any NHH DUoS time of day (year) tariff. This means that the same DUoS charges can be applied to many different time periods.

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2.162.22 For example, the Domestic Two Rate tariff will have a single day and night rate, which could apply to all of the following:

- The variations on clock time and GMT throughout the year. The many 'Economy 7' variations: 22:00 – 05:00; 22:00 – 00:00 and 02:00 – 07:00; 00:00 – 07:00; 23:00 – 01:00 and 03:00 – 08:00 etc.
- The variations on the length of the 'night' period: 'E8', 'E9', 'E10', 'Weathercall', 'Warmwise' and 'Evening/Weekend', afternoon boosts.

2.172.23 There are also two ~~Distributors~~~~NO areas~~ that do not use the TPR to determine the units to be charged under a NHH time of day tariff and instead charge on a fixed time period basis i.e. in the East Midlands and West Midlands areas, the Statement of Charges specifies that:

- *For all two rate NHH MPANs night is defined as 00.30 to 07.30 hours.*

Distributor / Central Approach

2.24 In these areas, the ~~Distributor~~~~DNO~~ utilises the profiled HH consumption values contained in the D0030 data flow to determine the units to be charged under the NHH DUoS time of day (year) tariff.

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2.25 An additional consideration for the changes required to implement DCP 268 is whether one approach should be adopted over the other, i.e. all ~~Distributors~~~~DNOs~~ would either use the incoming SSC/TPR combination to determine the appropriate unit rate to apply,

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or all Distributors ~~NOs~~ would use the time period in which the consumption falls to determine which unit rate to apply based on their R/A/G time bands.

2.26 The Working Group considers there is ~~one~~ ~~three~~ options for this split, ~~and are as follows:~~

Distributor Approach

2.27 Option 2a – utilise existing settlement combinations ~~SSC/TPR mappings~~ with the Distributor ~~NO~~ using the time period, month and weekday in which the consumption falls to determine which unit rate should apply. There is no change to the D0030 data flow as a result of this Option.

Combination (Central/ Distributor) Approach

~~2.18 Option 3a – utilise the unrestricted supplier SSC/TPR for all data with the Distributor using the time period in which the consumption falls to determine which unit rate should apply. This will cause changes to the D0030 data flow. SVAA will map all settlement combinations to an unrestricted combination and the Distributor will then use the distribution time period within which the consumption falls to determine the rate that should apply.~~

~~2.19 –~~

~~Option 2c – utilise the ~~DNO owned pseudo SSC/TPR combination~~ with the DNO using the SSC/TPR combination to determine which unit rate should apply.~~

~~2.1 –~~

Option 2a

2.22.28 Since DCP 268 seeks to introduce a time band charging basis for all NHH customers (regardless of the Supplier TPR), one option for implementing this change is to effectively roll out the DUoS billing approach currently in place in the East Midlands and West Midlands areas across all Distributors ~~DNOs~~. This approach would use the profiled HH consumption values contained in the D0030 data flow to determine the units to be charged in each time band introduced by DCP 268. The D0242 dataflow would present

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these consumptions and charges per ~~MDD⁴ combination as is currently done, based on the supplier settlement~~ SSC/TPR combination.

⁴~~MDD – Market Domain Data~~

Option 2 Process

2.1 — The DUoS billing process can be broken down into 4 steps:

1. — SVAA issues DTC D0030 file to DNO and Supplier
2. — DNO Creates 'Supplier bill'
3. — DNO issues DTC D0242 to Supplier

Supplier validates Midlands Area NHHSC De-linking Description

2.2 — Data is reported in the D0030 at a settlement class level. A settlement class is a combination of Distributor, Supplier, GSP Group Id, Profile Class, Line Loss Factor Class, Standard Settlement Configuration and Time Pattern Regime (TPR). The D0030 currently contains an SPX record which has 48 (or 46 or 50) fields that show profiled consumption for each half hour. The profiled values combine EAC (estimated) and AA (actual) data. The file also contains a TOT record which has one field for daily EAC and one for daily AA values. The sum of the 48 half hourly periods does not always exactly match the sum of the estimated and actual daily totals. I assume that this is a result of rounding at different levels but this may not be the case.

2.3 — Where a Distributor does not currently use de-linking, systems typically use the TPR of the settlement class to determine which Unit Rate to apply, and apply the relevant unit rate to the sum of the daily totals. This is reported on the D0242 to the Supplier as the Settlement Class Unit Charge.

2.4 — Where a Distributor currently uses de-linking, the system holds which times of day and days of the week are charged at which unit rate. When calculating charges, the system retrieves SPX data for each time band and applies the relevant unit rate. The values for each time band are added together and this total is reported on the D0242 to the Supplier as the Settlement Class Unit Charge.

2.5 — The D0242 contains a single 665 record which is a total for the statement and a 666 record for each settlement class that was in the original D0030, detailing MSID Charge and Unit Charge for that settlement class. Where charges have been calculated via de-linking, the Supplier does not receive a breakdown of charges by time band. This means that the

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D0242 has the same structure and fields populated for both methods of calculating unit charges.

2.6 — The same principles apply to the D0314 and D0315 processing.

Pros	Cons
Both Suppliers and distributors receive the same data	No difference in the size of the D0030 file
Requires no central system changes	A single SSC/TPR combination would potentially attract multiple unit rates (e.g. the 'day' element of an E7 tariff would likely attract all three unit rates for some of the consumption), leading to a single line of the D0242/0315 data flow relating to a given settlement combination attracting more than one unit rate. DNO invoice showing multiple unit rates
	Potentially requires system changes to Distributor/DNO and Supplier systems, which could have significant lead times and costs.

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Option 2b

2.7 — An alternative Party approach could be to remove the reliance on the SSC/TPR combinations.

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2.8 — In reality this would involve all LLFCs being mapped to the unrestricted SSC/TPR combination. DNOs would then use the profiled HH consumption values and invoice the supplier for units in the red/amber/green time bands but all against the unrestricted SSC/TPR combination.

Pros	Cons
Both suppliers and distributors receive the same data	Potentially requires system changes to DNO / IDNO and Supplier systems, which could have significant lead times and costs No difference in the size of the D0030 Likely to require a change to DNO and supplier systems
There would be a reduction in the size of the D0030 as (for example) two rate	Supplier and DNO would be responsible for independently splitting data from the

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tariffs which currently use two lines on the D0030 would only use a single line.	D0030 into unit rates, giving potential for validation discrepancies.
No central system changes required.	

Option 2c

~~2.9— Under this approach, the SVAA would use the pseudo SSC/TPR combinations currently being used for HH aggregate settlement to report HH profiled data to the DNO.~~

~~2.10— The DNO would then invoice the supplier on these SSC/TPR combinations in the existing manner (as introduced under P300).~~

<u>Pros</u>	<u>Cons</u>
<u>Both suppliers and distributors receive the same data.</u>	<u>No difference in the size of the D0030 file. Potential expansion to the D0030 as (for example) two rate tariffs which currently use two lines on the D0030 would be split over three.</u>
<u>No central system changes required.</u>	<u>Risk of non-billing — if the SVAA receives an invalid combination with the DNO pseudo SSC/TPR combination, it will not be reported to the DNO.</u>
<u>Minimal DNO and supplier system changes required.</u>	

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2.29 In order to progress with DCP 268, one of Options 1a-1d needs to be selected or, along with the Distributor, one of approach options 2a-2c. The following table outlines the number of lines which would be needed on the D0030 for each combination, along with supporting comments.

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<u>Count of Combinations SVAA Sends and Receives</u>	<u>Option 2a</u>			<u>Option 2b</u>			<u>Option 2c</u>		
	<u>SVAA receives</u>	<u>SVAA Sends Out</u>	<u>Comments</u>	<u>SVAA receives</u>	<u>SVAA Sends Out</u>	<u>Comments</u>	<u>SVAA receives</u>	<u>SVAA Sends Out</u>	<u>Comments</u>
<u>Option 1a</u>	<u>Not Compatible</u>			<u>161</u>	<u>7</u>	<u>1 line per LLFC</u>	<u>161</u>	<u>21</u>	<u>3 lines per LLFC (1 for each pseudo-SSC/TPR combination)</u>
<u>Option 1b</u>	<u>Not Compatible</u>			<u>161</u>	<u>9</u>	<u>1 line per LLFC plus additional line for MC F and G</u>	<u>161</u>	<u>27</u>	<u>3 lines for each LLFC plus 3 lines for each of MC F and G</u>
<u>Option 1c</u>	<u>161</u>	<u>161</u>	<u>This is effectively the status quo option</u>	<u>161</u>	<u>16</u>	<u>1 line per LLFC per profile class</u>	<u>161</u>	<u>48</u>	<u>3 lines for each combination of LLFC/PC</u>
<u>Option 1d</u>	<u>Not Compatible</u>			<u>Not Compatible</u>			<u>161</u>	<u>483</u>	<u>Potentially 3 lines for every incoming combination</u>

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3 REQUEST FOR INFORMATION

3.1 Parties are asked to consider the following RFI questions:

Question Number	General Questions
1.	Please advise which is your preferred option? Please provide your rationale inclusive of any financial, resource or system impact or restriction.
2.	Please provide your comments on <u>all</u> options 1-5 (<u>1a-d and 2a-e</u>) based on your priority of preference for the solution proposed? Please provide your rationale inclusive of any system impacts.
3.	What do you consider is the development timescale required for each of these options? Please provide your rationale.
<u>4.</u>	<u>Distributors: What approaches will you be taking to the LLFCs for each of these options?</u>
<u>4.5.</u>	Are there any alternative solutions or unintended consequences that should be considered by the Working Group?

3.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than ~~16 September~~30 August 2016.

3.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

4 NEXT STEPS

Commented [CH21]: Define a con for Distribution and Centralised option - Add a statement that these options will be applicable from a settlement date. Current or new methods will be run in parallel for central options only. Different way of processing the D0030 on the Distribution option.

Commented [CH22]: Identify settlement run options and ask a question on the centralised information impact assessment.

Commented [CH23]: Retain old and new aggregations on the D0030 for the transition period and remove them after the transition period. Settlement dates prior to the implementation date use the existing SSC TP R data as you would be using in 2a and remove it for settlement dates after. For settlement data put the existing version

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Commented [CH24]: Reference relevant paragraph.

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Commented [OC25]: As mentioned earlier think this needs to be at least the middle of September so that receive as much feedback as possible.

DCUSA RFI

4.1 The DCP 268 Working Group will review the RFI responses with a view to making a recommendation to the DCUSA Panel.

4.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA Help Desk by email to dcusa@electralink.co.uk or telephone 020 7432 3017.

ATTACHMENT

- Attachment 1 - DCP 268 RFI Response Form
- Attachment 2 - Three Options on the D0030 Dataflow
- Attachment 3 – P300 Final Requirements
- Attachment 4 - DCP 268 Change Proposal

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