

**DCUSA DCP 170 Consultation Responses – Collated Comments**

Question One	Do you agree with the intent of DCP 170? Please provide supporting comments.	Working Group Comments
<b>British Gas</b>	Yes. Changes to the DCUSA are required to meet Ofgem's Code Governance review final proposals	Noted.
<b>Electricity North West Limited</b>	Yes we agree with the intent of the DCP.	Noted.
<b>Northern Powergrid</b>	Yes, we agree that this change is required to support requirements resulting from Ofgem's Code Governance Review Phase 2 Final Proposals.	Noted.
<b>Npower</b>	Yes. Npower very much supports opportunities to simplify and streamline the code.	Noted.
<b>SP Distribution &amp; SP Manweb</b>	Yes	Noted.
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power</b>	Yes – the CP is clearly required to facilitate Licence changes, to a timescale established by the Authority.	Noted.

<b>Distribution plc</b>		
<b>UK Power Networks</b>	Yes	Noted.
<b>Question Two</b>	<b>Do you agree with the principles of DCP 170? Please provide supporting comments.</b>	<b>Working Group Comments</b>
<b>British Gas</b>	Yes	Noted.
<b>Electricity North West Limited</b>	Yes we agree with the principles of the DCP	Noted.
<b>Northern Powergrid</b>	Yes, we agree that this change is required to support requirements resulting from Ofgem's Code Governance Review Phase 2 Final Proposals.	Noted.
<b>Npower</b>	Yes	Noted.
<b>SP Distribution &amp; SP Manweb</b>	Yes	Noted.
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution</b>	Yes – in our view the CP makes appropriate proposals to correspond with the Licence changes	Noted.

<b>plc</b>		
<b>UK Power Networks</b>	Yes	Noted.
<b>Question Three</b>	<b>Do you understand the proposed changes as set out in the modifications table of section 3 of this consultation and why those changes are being made?</b>	<b>Working Group Comments</b>
<b>British Gas</b>	Yes	Noted.
<b>Electricity North West Limited</b>	Yes we understand the proposed changes set out in the modifications table in section 3 of the consultation. These changes are being made due to the modification of SLC 22 of the Distribution Licence.	Noted.
<b>Northern Powergrid</b>	Yes	Noted.
<b>Npower</b>	Yes	Noted.
<b>SP Distribution &amp; SP Manweb</b>	Yes, we understand the proposed changes and the reasons they are required.	Noted.
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Yes.	Noted.

<b>UK Power Networks</b>	Yes	Noted.
<b>Question Four</b>	<b>Do you recommend any further clarifications that could be documented within the Change Report when it is drafted that would facilitate further understanding? Please provide supporting comments.</b>	<b>Working Group Comments</b>
<b>British Gas</b>	No	Noted.
<b>Electricity North West Limited</b>	We have no further recommendations as the Change Reports provides the discussions had at the Working Group meetings to determine the changes required to comply with SLC 22.	Noted.
<b>Northern Powergrid</b>	We note that the Working Group is interested in parties views on the additional support which Parties expect from the DCUSA Code Administrator acting in the role of Critical Friend (Principle 1 of the CACoP) to support smaller DCUSA Parties. It may be helpful to include the Critical Friend section of the CACoP, including the introductory paragraph regarding 'under-represented parties, small market participants and consumer representatives' along with the 18 points to describe the Critical Friend role, as an appendix to the change report. This may help DCUSA parties better understand this part of the change proposal given that Questions 7 A, B and C refer to the 'Critical Friend' role.	The Working Group agreed to add the CACoP to the Change Report to provide background information to the change.
<b>Npower</b>	We feel a high level summary section giving context will be helpful to parties when receiving the document for consideration.	Noted.
<b>SP Distribution &amp; SP Manweb</b>	None.	
<b>Southern Electric</b>	We believe that the consultation (in particular the modifications cross reference table) provides a very good explanation of the changes that	Noted.

<b>Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	are proposed to match the relevant Licence changes.  However, as noted in Q11 below, we believe that it would be of benefit if the 'critical friend' role was the subject to further guidance to clarify what this term means in practice and to set reasonable expectations of what assistance/services may be provided by the Secretariat, whilst maintaining impartiality.	
<b>UK Power Networks</b>	No	Noted.
<b>Question Five</b>	<b>Do you have any comments on the proposed legal drafting of DCP 170?</b>	<b>Working Group Comments</b>
<b>British Gas</b>	No	Noted.
<b>Electricity North West Limited</b>	No further comments on the legal drafting.	Noted.
<b>Northern Powergrid</b>	No	Noted.
<b>Npower</b>	No	Noted.
<b>SP Distribution &amp; SP Manweb</b>	None.	Noted.
<b>Southern Electric Power Distribution</b>	No.	Noted.

<b>plc and Scottish Hydro Electric Power Distribution plc</b>		
<b>UK Power Networks</b>	With the change in 10.4.7 the proposer is required to state if they believe it is a Part 1 or Part 2 matter. Could consider a minor change to 11.8 and/or 11.9 to reflect if the Panel agrees or overrules the Proposers viewpoint.	The Working Group agreed to amend 11.8 to refer to the recommendation of the proposer.
<b>Question Six</b>	<p><b>Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.</b></p> <ol style="list-style-type: none"> <li><b>1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.</b></li> <li><b>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.</b></li> <li><b>3. The efficient discharge by each of the DNO Parties and IDNO</b></li> </ol>	<b>Working Group Comments</b>

	<p>Parties of the obligations imposed upon them by their Distribution Licences.</p> <p>4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.</p> <p>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.</p>	
<b>British Gas</b>	We agree with the working group that general objective – <i>“The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences”</i> will be better facilitated by this proposal	Noted. The Working Group agreed that Objective 3 is better facilitated by this change.
<b>Electricity North West Limited</b>	General objective 3 as the proposed changes ensure that DNO and IDNO parties are compliant with the modified SLC 22.	Noted.
<b>Northern Powergrid</b>	Yes, General objective 3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.	Noted.
<b>Npower</b>	We feel this change definitely supports Objective 3 but it also facilitates Objective 4 as it will help simplify and streamline the code, as explained in question 1.	Noted.
<b>SP Distribution &amp; SP</b>	We agree with the Working Groups assessment that the change better facilitates General objective 3.	Noted.

<b>Manweb</b>		
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	We agree with the Working Group that General Objective 3 would be better facilitated by implementation of this CP, as the proposals within it would provide Parties with a route to achieving compliance with the amended Licences, in an appropriate manner.	Noted.
<b>UK Power Networks</b>	3, 4.	Noted.
<b>Question Seven A</b>	<p><b>Q7A. DCP 170 will bring about requirements for the DCUSA Secretariat to act in accordance with the CACoP (to the extent appropriate to the code). This includes CACoP Principle 1 - being a 'Critical Friend' to Industry participants, with 18 points to describe the Critical Friend role. Please provide your opinions on:</b></p> <p><b>How do you envisage this role working within the DCUSA arrangements? Please provide examples where possible to illustrate your comments.</b></p>	<b>Working Group Comments</b>



<b>British Gas</b>	We are happy that the role Electralink currently performs meets the 18 points covered by the CACoP	Noted.
<b>Electricity North West Limited</b>	<p>The DCUSA Secretariat fulfils majority of the 18 points of the 'Critical Friend' role within the CACOP.</p> <p>Some of the areas which we believe DCUSA Secretariat will need to develop are ;</p> <ul style="list-style-type: none"> <li>• Engaging with under-represented parties, small Market participants and consumer representatives.</li> <li>• Involvement with other code administrators where the impact is across multiple codes.</li> <li>• Viewpoints of the under-represented parties, small Market participants and consumer representatives are discussed at working groups and are captured in Change Reports.</li> </ul>	<p>Noted. The Working Group agreed to request further feedback from ENWL.</p> <p>The Working Group agreed to recommend to the DCUSA Panel that a monthly meeting be set up which provides a summary of the modifications and their progress through the DCUSA change process.</p> <p>This is met by the DCUSA Secretariat attending the Cross Codes Forum and by interaction with the other codes who attend the monthly DCUSA Panel meeting.</p>
<b>Northern Powergrid</b>	<p>Firstly, it may have been helpful to include the Critical Friend section of the CACop, including the introductory paragraph regarding 'under-represented parties, small market participants and consumer representatives' along with the 18 points to describe the Critical Friend role, as an appendix to the consultation pack.</p> <p>We note that the CACop states that A 'critical friend' is a 'Code Administrator who provides support to all with an interest in the code Modification process, but paying particular attention to under-represented parties, small market participants and consumer representatives'. It would seem appropriate to check that the overall arrangements in DCUSA should support the 18 points rather than focussing on the Secretariat being equipped to meet the 18 points. For</p>	Noted.

	<p>example;</p> <ul style="list-style-type: none"> <li>Two points from the CACop are ‘Helping users effectively frame and develop Modifications’ and ‘Ensuring people are available to discuss issues and Modifications with all interested parties’: - The current combination of Secretariat support and the function of the Standing Issues Group (SIG) would seem to combine to fulfil both of these points without placing the onus solely on the Secretariat.</li> </ul> <p>It may be appropriate to review each of the 18 Critical Friend points to check if existing specific processes or arrangements in DCUSA (or combinations of current arrangements) already meet the requirements prior to introducing any new arrangements or placing new responsibilities on the Secretariat via DCUSA’s contract with it.</p> <p>It may be worth clarifying whether the new obligations on the ‘Code Administrator’ can be discharged via arrangements in DCUSA in the round or whether specific actions must be taken by the Secretariat or even whether they can be delegated to say working groups.</p>	
<b>Npower</b>	The Critical Friend role could support participants (e.g. new entrants) in compiling change proposals and giving general guidance on DCUSA matters. However, the critical Friend should not provide legal advice or interpretation of the Code, that is a matter for Parties.	<p>Noted. The Working Group agreed that the Secretariat could provide advice on the change process but did not consider it suitable for the Secretariat to draft CPs as the role is not required to have such technical knowledge of the code.</p> <p>If more expertise is required in developing a CP the Secretariat should refer the proposer to the DCUSA SIG to develop the change before applying for an initial assessment to the DCUSA Panel.</p>
<b>SP Distribution</b>	This role will be an extension to the role currently provided.	Noted.

<b>&amp; SP Manweb</b>		
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	<p>We would envisage that the DCUSA Secretariat may have to establish a distinct role or service to support/mentor/guide/represent 'small participants' in the change processes, to proactively seek this group's views on issues and requirements, and potentially to raise CPs on their behalf. This would most likely have to be separated to some extent from more established service provision and would probably also require access to specialist advice in some areas of DCUSA scope.</p>	<p>Noted. The Working Group agreed that the majority of the 'Critical Friend' role was met in the round by the DCUSA arrangements whether it was through the role of the Secretariat, the DCUSA Panel, or through the roles of Working Group members and the DCUSA Standing Issues Group (SIG). Therefore it did not consider that a separate a service provision of specialist advice would be required.</p>
<b>UK Power Networks</b>	<p>I do not see any need for significant impact on DCUSA due to the existing governance being largely compliant with the requirements of CACoP</p> <p>One area which may cause a change is that other codes which are impacted are normally picked up by Working Group members and changes raised for the other codes as appropriate. The requirements of CACoP will mean that the Secretariat will also have to notify the Secretariat of the other codes impacted, which introduces a requirement for the secretariat to have a wider understanding of other codes and how they could be impacted by industry change.</p> <p>Principle 6 'A proposer of a Modification will retain ownership of the detail of their solution' of CACoP may have implications on DCUSA not included in the current legal text as only the proposer can make changes to the proposed solution and effectively gives them a veto over the Working Group.</p>	<p>Noted.</p> <p>Under the current DCUSA change process, the Proposer can submit an alternative solution if they disagree with the solution developed by the Working Group. The Panel must submit the Proposer's solution for Party voting. Therefore, the</p>

		Working Group considered the DCUSA change process does comply with Principle 6.
<b>Question Seven B</b>	<b>In what ways to do you think the DCUSA Secretariat already delivers the Critical Friend role? Please provide examples where possible to illustrate your comments.</b>	<b>Working Group Comments</b>
<b>British Gas</b>	We are happy that the role Electralink currently performs meets the 18 points covered by the CACoP	Noted.
<b>Electricity North West Limited</b>	<p>The DCUSA Secretariat already delivers the 'Critical Friend' role in the following way;</p> <ul style="list-style-type: none"> <li>• Assisting in developing change proposals.</li> <li>• Setting up working groups to discuss the issues, for example; Standing Issues Group and working groups required to discuss solutions for DCUSA Change proposals.</li> <li>• Setting up Terms of References for Working Groups</li> <li>• Circulating consultations, Requests for Information and voting documentation to market participants.</li> <li>• Holding teleconferences if this is more convenient.</li> <li>• Web-site for participants to access modifications and documentation.</li> </ul>	Noted.
<b>Northern Powergrid</b>	We also note the CACoP establishes principles for Code Administrators to follow and also sets out principles applicable to a code Modification process. It therefore seems to be appropriate to consider the wider arrangements and processes in DCUSA and not just the role of the Secretariat in the context of whether DCUSA (in the round) already delivers the 'Critical friend' role. Examples of how the existing support potentially matches the requirements of the Critical Friend role include:	Noted.

	<ul style="list-style-type: none"><li>• Helping users effectively frame and develop Modifications;</li><li>• Proactively reviewing and commenting on draft Modifications;</li></ul> and <ul style="list-style-type: none"><li>• Ensuring people are available to discuss issues and Modifications with all interested parties</li></ul> <p>The combination of the Secretariat and the SIG already appears to meet the above requirements.</p> <ul style="list-style-type: none"><li>• Providing easily accessible education on its code Modification process; and</li><li>• Ensuring users understand the minimum requirements for Modifications to be progressed;</li></ul> <p>DCUSA can and has provided training on its processes and we believe the Secretariat already assists Parties with the minimum requirements for completing change proposal forms. Ensuring that:</p> <ul style="list-style-type: none"><li>• unsubstantiated assumptions or assertions do not go unchallenged;</li><li>• all arguments for and against a Modification are adequately discussed at Workgroup and Panel level and reflected in Modification documents;</li></ul> <p>It would appear that the above responsibilities are catered for in existing working group arrangements. Ensuring that:</p> <ul style="list-style-type: none"><li>• previous discussions or decisions that may be relevant to the Modification being considered are highlighted.</li><li>• small market participant/consumer representatives viewpoints</li></ul>	
--	--	--

	<p>can be articulated and debated at Workgroup and Panel meetings and that other Workgroup members or panellists do not seek to stifle or prevent such debate;</p> <p>The above would appear to be a function of existing working group arrangements.</p> <ul style="list-style-type: none"> <li>• Providing input into the terms of reference set by the Panel and the Workgroup's analysis, taking into account for example, any feedback on the quality of analysis provided in relation to previous reports or relevant views expressed by Ofgem;</li> <li>• Remaining impartial;</li> <li>• Encouraging participation in code modification processes;</li> <li>• Contacting relevant market participants/consumer representatives that have indicated they wish to be contacted when a Modification raises issues that may impact on their group;</li> <li>• Contacting other Code Administrators if a Modification may affect them (directly or indirectly);</li> <li>• Holding teleconference rather than 'face to face' meetings if this is more convenient for those that wish to participate, including smaller market participants;</li> <li>• Improving websites, potentially with the inclusion of web-based forums, to provide easy access to information on code Modifications;</li> <li>• Responding quickly to requests for information and support.</li> </ul> <p>The above would appear to be supported by existing DCUSA Secretariat arrangements.</p>	
--	--	--

	<ul style="list-style-type: none"> <li>• Scheduling meetings that enable market participants to obtain updates on all relevant code Modifications at one meeting;</li> <li>• Raising Modification issues that are relevant to small market participants who are not otherwise represented at appropriate Industry meetings;</li> </ul> <p>The above requirements may be readily supported administratively, but it is unclear how a Secretariat could fully tune in to the business needs of individual small industry participants, unless the parties themselves explained in advance what their specific needs were and what would constitute 'relevant' issues and modifications for their respective businesses.</p> <p>We are happy with the support we receive from DCUSA and in particular with our points of contact with the DCUSA Secretariat. We would also note that Electralink appears to remain proactive in suggesting to the DCUSA Panel ways in which it might further improve services to DCUSA parties and it is therefore to be expected that Electralink may sometimes communicate additional potential costs alongside such suggestions. However, we would like to see such suggestions matched by process efficiency savings elsewhere to broadly maintain or reduce the overall size of the current DCUSA costs if possible.</p>	
<b>Npower</b>	We have seen this demonstrated through webinar sessions and meeting facilitation. We feel continuation of awareness sessions would be beneficial, particularly to new entrants.	Noted.
<b>SP Distribution &amp; SP Manweb</b>	The DCUSA secretariat currently provides assistance to the open governance process by, for example, arranging meetings, issuing papers, providing advice on the process and timescales of panel meetings etc., assisting with the drafting consultations, RFIs and	Noted.

	requests.	
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	The Working Groups for DCPs 162, 166 and 167 which are currently in progress include participation from 'customer representatives'. The Secretariat has, in our view, successfully endeavoured to support the 'small participants' in these Groups in alignment with a number of the points of the 'critical friend' role, such as grouping the meetings together, having teleconference facilities available, and providing information on the DCUSA processes. However, the full implications of the 'critical friend' role are considerably wider and significantly more onerous to deliver.	Noted.
<b>UK Power Networks</b>	Examples include: <ul style="list-style-type: none"> <li>• publication of information on the public and private website pages</li> <li>• impartial advice</li> <li>• helping users (introduction of DCUSA training day)</li> <li>• Working Group planning for maximum attendance of interested parties</li> <li>• Meetings open to all Parties/users</li> <li>• Meetings in person and/or teleconference and web conference</li> </ul>	Noted.
<b>Question Seven C</b>	<b>What type of additional support do you feel would be required for the DCUSA Secretariat to further deliver the Critical Friend role? Please provide examples where possible to illustrate your comments.</b>	<b>Working Group Comments</b>
<b>British Gas</b>	No further additional support required	Noted.
<b>Electricity North West</b>	Additional support required from the DCUSA Secretariat to deliver the 'Critical Friend' role would be to be proactive in communicating and	Noted. Please see response to question 7A.



<b>Limited</b>	engaging with under-represented parties, small Market participants and consumer representatives ensuring their views are made at working groups and captured in the Change Reports.	
<b>Northern Powergrid</b>	<p>We are happy with the support we receive from DCUSA and in particular with our points of contact with the DCUSA Secretariat. However, we are also aware of indications of potential concerns that some parties may be having difficulties engaging with DCUSA processes. Unfortunately it is unclear whether such concerns are driven by parties finding the DCUSA change process intrinsically difficult to engage with or whether such concerns are more likely driven from a combination of increased DCUSA change activity against a backdrop of limited specialist resource.</p> <p>We believe it may have been better to frame this question slightly differently i.e. 'What type of additional support do you feel would be required for the DCUSA Secretariat and the DCUSA arrangements in general to further deliver the required points to support the Critical Friend role?</p> <p>We believe that it is essential that any parties with concerns should be responding to questions like Q7C so that DCUSA can address any issues within its processes. However, if the root causes of any concerns lay well outside DCUSA's control then we would not wish to see DCUSA's span of activities widening too far to try and fill any gaps. Taking two examples from the points in the CACop:</p> <ul style="list-style-type: none"> <li>• We note that one of the 18 points is 'Providing easily accessible education on its code Modification process': it is clear that DCUSA can provide training on its processes and indeed it has done so.</li> <li>• However, we also note two other points that 'unsubstantiated</li> </ul>	Noted.

	<p>assumptions or assertions do not go unchallenged’ and ensuring that ‘all arguments for and against a Modification are adequately discussed at Workgroup and Panel level and reflected in Modification documents’. While these are completely acceptable requirements we would expect these requirements to be met by the working arrangements under DCUSA rather than exclusively via the Secretariats responsibilities.</p> <p>Taking the latter example, if it emerged, for example that issues were arising in supporting a modification in the change process, say from a lack of specialist expertise volunteering for that particular working group, it would seem inappropriate to expect the Secretariat to ‘ensure all arguments for and against a Modification are adequately discussed at Workgroup and Panel level and reflected in Modification documents’ so this comes back to our earlier point about reviewing the 18 point requirements against the DCUSA arrangements as a whole rather than expecting or developing the Secretariat to be able to meet all of the end-to-end requirements of the ‘Critical Friend’ role on behalf of any small party.</p>	
<b>Npower</b>	Depending on the number of new entrants and volume of requests for a Critical Friend, extra resource and people could potentially be required.	Noted.
<b>SP Distribution &amp; SP Manweb</b>	No further comments at this time.	Noted.
<b>Southern Electric Power Distribution</b>	As the DCUSA governs a very wide range of electricity industry activity and some of the provisions are particularly detailed and specialist (e.g. the schedules on the use of system and connection charging methodologies), additional training and/or use of independent	Noted. The Working Group noted that the Secretariat had recently provided an induction training session, which covered the change process, to industry parties to help them understand the

<b>plc and Scottish Hydro Electric Power Distribution plc</b>	consultants may be required to ensure adequate knowledge levels within the Secretariat.	process and engage it with it more fully.
<b>UK Power Networks</b>	None	Noted.
<b>Question Seven D</b>	<b>What further support would you like to see the DCUSA arrangements (in particular the secretariat) provide to the industry?</b>	<b>Working Group Comments</b>
<b>British Gas</b>	We have not identified any areas for further support	Noted.
<b>Electricity North West Limited</b>	It would be appropriate for the DCUSA Secretariat to chair the DCUSA working groups and meetings in line with the activities undertaken by other code administrators. This way the DCUSA Secretariat can ensure that information received from the unrepresented parties, small suppliers and consumer representatives are discussed.	Noted. The Working Group considered that the Secretariat currently presents Parties' views if they are unable to attend a Working Group meeting and did not consider that this would change by the Secretariat acting as Chair of the Working Group.
<b>Northern Powergrid</b>	We are happy with the support that DCUSA provides to us in our engagement with the change process and would note recent initiatives to further assist parties in engaging with DCUSA, specifically the recent DCUSA training sessions and the website development project, including the opportunity for parties and users to engage with the website project to suggest changes/improvements to the website e.g. to further improve ease of use. However we would also note that any further additional proposed support for the industry ought to be reviewed alongside the anticipated costs and benefits of providing such support.	Noted.
<b>Npower</b>	Npower are very satisfied with the service already provided by the	Noted.

	secretariat.	
<b>SP Distribution &amp; SP Manweb</b>	No further comments at this time.	Noted.
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	No particular view to report.	Noted.
<b>UK Power Networks</b>	None	Noted.
<b>Question Eight</b>	<p>DCP 170 will bring about changes which will affect the DCUSA CP Form and the DCUSA Voting Form (Attachments A and B to this consultation).</p> <p>Please provide comments on the changes that have been made to these forms; and</p> <p>Please describe any further changes you would suggest to the forms.</p>	<b>Working Group Comments</b>
<b>British Gas</b>		Noted.

	We are happy with the proposed changes	
<b>Electricity North West Limited</b>	The changes to both forms ensure parties provide a reason of why the relevant DCUSA objective(s) better facilitated or not facilitated by the change.	Noted.
<b>Northern Powergrid</b>	No comment	Noted.
<b>Npower</b>	CP form – we are happy with this  Voting form – We feel it would be beneficial to clarify the Objectives element within the Response section of the voting form. With the current draft the Parties may be unsure whether they are being asked to respond to the Objectives stated in the CP or by the Working Group.	Noted. The group agreed to delete the wording <i>“Objectives accept/reject”</i> from the voting form and replace with <i>“Give your reasons why the Objectives are better facilitated?”</i> and insert a list of the DCUSA Objectives.
<b>SP Distribution &amp; SP Manweb</b>	With regard to the CP form, the definition of “detailed rationale” could be clearer to provide the proposer with further guidance on the level of detail that will be required.  No further changes suggested at this stage.	Noted.
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	We are satisfied with the proposed changes to these forms.	Noted.
<b>UK Power</b>	In the CP form, the change to request “Detailed” Rationale for DCUSA	Noted. The Working Group agreed to update the CP

<b>Networks</b>	Objectives has only been added to the Charging objectives and in the guidance note 10. It is not clear if a “Detailed” Rationale is required for non-charging objectives or whether just a rationale (that is not referenced in the guidance notes) will suffice.	form so that the wording “Detailed Rationale” appeared as the title in the section above part C of the CP form for non-charging objectives.
<b>Question Nine</b>	<b>Do you agree with the implementation date of DCP 170? Please provide supporting comments.</b>	<b>Working Group Comments</b>
<b>British Gas</b>	We agree with the proposed date, this is required to meet licence condition timescales	Noted.
<b>Electricity North West Limited</b>	Yes, as the Authority need to approve the changes.	Noted.
<b>Northern Powergrid</b>	Yes, provided that any necessary changes to processes and documentation can be put in place alongside ‘business as usual’ activities and do not incur any extraordinary costs in meeting the proposed implementation data.	Noted.
<b>Npower</b>	Should be Q9: An implementation date of 1st January 2014 would be aligned to the license, however, would this be possible considering Ofgem’s Christmas publishing moratorium / code modification decision KPIs?	Noted.
<b>SP Distribution &amp; SP Manweb</b>	Yes.	Noted.
<b>Southern Electric Power</b>	Yes.	Noted.

<b>Distribution plc and Scottish Hydro Electric Power Distribution plc</b>		
<b>UK Power Networks</b>	It is unclear what date is proposed but note it will be long after the Initial Assessment of this change.	Noted.
<b>Question Ten</b>	<b>Do you foresee any perceived difficulties with the implementation of the proposed changes? If so, please provide your suggested solutions.</b>	<b>Working Group Comments</b>
<b>British Gas</b>	We have not identified any difficulties	
<b>Electricity North West Limited</b>	No	Noted.
<b>Northern Powergrid</b>	No, provided that the overall DCUSA processes are considered in the context of the 'Critical Friend' role and not just the role of the Secretariat.	Noted.
<b>Npower</b>	Should be Q10: No	Noted.
<b>SP Distribution &amp; SP Manweb</b>	None at this time.	Noted.
<b>Southern Electric</b>	The implementation of the 'critical friend' role could be problematic, as expectations of 'assistance' and interpretations of what is 'reasonable'	Noted.

<b>Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	<p>are likely to vary widely. A number of the 18 points within the CACoP are also open to differing interpretations of their meaning for application in practice.</p> <p>As an example, some might consider that legal advice could/should be provided by the Secretariat to assist the drafting of a CP and/or proposed legal text for a 'small participant' but, given the potential costs involved, would this be 'reasonable'?</p> <p>Some guidance notes, established by the Panel and published on the DCUSA website, might be a means of clarifying the extent of assistance that may be provided by the Secretariat, how impartiality impacts on what can be provided and to generally set reasonable expectations of the 'critical friend' role.</p>	The Working Group does not consider it to be within the Secretariat's remit to draft CPs for Parties or to provide legal advice on the DCUSA provisions. The Working Group agreed to insert further guidance notes in the CP form to clarify this point.
<b>UK Power Networks</b>	No	Noted.
<b>Question Eleven</b>	<b>Are there any alternative solutions or matters that should be considered by the Working Group?</b>	<b>Working Group Comments</b>
<b>British Gas</b>	We have not identified any alternative solutions	Noted.
<b>Electricity North West Limited</b>	None at this point in time.	Noted.
<b>Northern Powergrid</b>	No	Noted.
<b>Npower</b>	Should be Q11: Npower are satisfied the working group have covered necessary areas.	Noted.
<b>SP Distribution &amp; SP</b>	None at this time.	Noted.



<b>Manweb</b>		
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Not that we are aware of.	Noted.
<b>UK Power Networks</b>	No	Noted.