




DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 266</h2> <h3>The calculation and application of IDNO discounts</h3> <p><i>Date Raised: 9 March 2016</i></p> <p><i>Raised as a: Standard Change</i></p>		<div>01 – Change Proposal</div> <div>02 – Consultation</div> <div>03 – Change Report</div> <div>04 – Change Declaration</div>
<p><b>Purpose of Change Proposal:</b></p> <p>DCP 266 Seeks to change the way in which Distribution Network Operator (DNO) tariffs to Licensed Distribution Network Operators (LDNOs) are calculated in the Common Distribution Charging Methodology (CDCM). Instead of calculating an LDNO percentage discount by comparing the avoided total cost (p/kWh) with the total cost (p/kWh) in the CDCM Price Control Disaggregation Model (PCDM), the intent of this change proposal is that the avoided total cost (p/kWh) calculated in the PCDM is compared with the average p/kWh figure for each All The Way (ATW) CDCM tariff in order to determine the LDNO % discount factor to be applied to each of the tariff components of the CDCM ATW tariff.</p>		
	<p>This document is a Consultation issued to DCUSA Parties and any other interested parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 266 'The calculation and application of IDNO discounts'</p>	
	<p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p>	
	<p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>15 May 2019</b>.</p>	
	<p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).</p>	
	<p>Impacted Parties: DNOs, IDNOs, Suppliers</p>	
	<p>Impacted Clauses: Schedule 16, Introduction, paragraph 3 and 52</p> <p>Schedule 17, paragraph 1.3</p> <p>Schedule 18, paragraph 1.3</p> <p>Schedule 20, paragraph 1.1</p> <p>Schedule 29, various paragraphs</p>	

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Any questions?

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Timetable

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

Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	09 March 2016
First Consultation issued to Parties	01 February 2018
Second Consultation issued to Parties	17 April 2019
Change Report issued to Panel	10 July 2019
Change Report issued for Voting	19 July 2019
Party Voting Ends	09 August 2019
Change Declaration Issued to Parties	13 August 2019
Change Declaration issued to Authority	13 August 2019
Authority Decision	17 September 2019

# 1 Summary

## What?

- 1.1 DCP 266 was raised by British Gas and seeks to change the way in which Distribution Network Operator (DNO) tariffs to Licensed Distribution Network Operators<sup>1</sup> (LDNOs) are calculated in the Common Distribution Charging Methodology (CDCM).
- 1.2 The intent of this Change Proposal (CP) is to ensure that the revenue available to an LDNO once it has paid the host DNO's charges is entirely determined by the analysis of costs carried out in accordance with the requirements of DCUSA Schedule 29 'calculation of discount percentages for the purpose of determining certain LDNO use of system charges under schedules 16, 17 and 18', which are realised in the Price Control Disaggregation Model (PCDM).

## Why?

- 1.3 It is the view of the Proposer that such an approach achieves a better allocation of revenues between an LDNO and the host DNO because it would be based on an allocation of total costs which will not be impacted by the hypothetical incremental cost allocation approach applied in the CDCM. The Proposer notes that this ensures an LDNO is able to receive the same margin as the host DNO's notional downstream business.

## How?

- 1.4 The PCDM calculates percentage discounts which are applied to the CDCM all-the-way charges to allocate CDCM revenues between an LDNO and the host DNO. It does this by allocating allowed revenues on a p/kWh basis to different network tiers using specified drivers. The percentage discount is calculated as the sum of revenue allocated to network tiers for which the LDNO is responsible as a percentage of total revenue. These calculations are carried out by voltage level, resulting in inputs to the CDCM and Extra High Voltage Distribution Charging Methodology (EDCM) by voltage level, which are applied to tariffs by reference to the voltage of connection of the end user in question and the voltage of the LDNO to DNO boundary (for example a single percentage discount applies to all tariff elements of all end customers connected at LV where the DNO to LDNO boundary is at HV).

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<sup>1</sup> In this context LDNOs are Independent Distribution Network Operators and DNOs operating out of their distribution services area.

- 1.5 In order to maintain the existing process whereby the PCDM calculates a single percentage discount which can be applied to all tariff elements in the CDCM, the proposed solution is to calculate:
- (a) the sum of revenue allocated to network tiers for which the LDNO is responsible (on a p/kWh basis using the principles of the existing PCDM); and
  - (b) an average absolute p/kWh for each all-the-way tariff in the CDCM, by dividing the total revenue collected from all tariff components of that tariff by the total volume associated with that tariff.
- 1.6 A discount percentage would then be calculated by dividing point (a) by point (b) above.
- 1.7 As a result of the inclusion of point (b) of paragraph 1.5 within the calculations, the PCDM will determine a percentage discount for each combination of all-the-way CDCM tariff and DNO to LDNO boundary voltage. As a result, an amendment to both the CDCM and EDCM models will be required to enable the models to use inputs by all-the-way tariff and DNO to LDNO boundary voltage.

Please note: this CP will have a significant impact on the LDNO community

## 2 Governance

### Justification for Part 1 Matter

- 2.1 DCP 266 is classified as a Part 1 matter as it is likely to have a significant impact on competition in the distribution of electricity – see DCUSA clause 9.4.2 (B). This means that DCP 266 will go to the Authority for determination after the voting process has completed.

### Requested Next Steps

- 2.2 Following a review of the Consultation responses, the Working Group will work to agree the detail of the solution for DCP 266 and subject to responses the Working Group will proceed to drafting the Change Report.

## 3 Why Change?

### Background of DCP 266

#### The status quo:

- 3.1 The CDCM is an incremental cost methodology by design. It is intended to provide forward looking incremental cost signals to users of the network. LDNO percentage discounts are calculated in the PCDM and input to the CDCM to calculate the discounted CDCM tariffs to be applied to LDNOs.
- 3.2 The PCDM is a total cost methodology by design. By analysing the DNO's total costs and revenues, the PCDM is intended to determine the portion of the all-the-way revenue that an LDNO should retain once it has paid the host DNO's charges.
- 3.3 The Proposer considers that the two differing allocation methods are appropriate given their respective intentions, but that the way in which the LDNO discounts are calculated in the PCDM and applied within the CDCM could be improved to better reconcile the two approaches.
- 3.4 The calculation of LDNO discounts follows the following steps as indicated in paragraph 3 of Schedule 29:
  - a) Breakdown of price control allowed revenue between operating expenditure, depreciation and return on regulatory asset value.
  - b) Allocation of each of these components of price control allowed revenue to network levels.
  - c) Determination of a percentage allocation of total revenue per unit to network levels.
  - d) Determination of the proportion of the LV mains deemed to be used by LV-connected embedded networks.
  - e) Determination of the proportion of the HV network deemed to be provided by HV-connected embedded networks.
  - f) Calculation of the discount percentage for each combination of boundary network level and end user network level.
- 3.5 The Proposer noted that DCP 266 is limited in scope to the final step (f) above. It seeks to change a perceived defect in the way the outputs of the prior steps are used to calculate the discount percentages that are applied to all-the-way tariffs in order to determine the LDNO tariffs.

#### Illustration of the defect:

- 3.6 The PCDM allocates total allowed revenues on a p/kWh basis to different network tiers using specified cost drivers. An illustrative example of the output of this is set out below (Table 1), which mirrors the information which can be found in tables 1439 and 1440 of the 2018/19 PCDM:

		p/kWh	Commentary
Total Revenue		2.50	Total revenue divided by total units.
Allocation to Voltage Levels	EHV and above	0.83	Voltages above EHV are treated as one for the calculation of CDCM discounts - these are always host DNO assets.
	HV	0.50	Allocation to each voltage, with LV Services treated as a separate voltage level to ensure revenues associated with LV Services are entirely allocated to the LDNO even when the DNO to LDNO boundary is at LV.
	HV/LV	0.20	
	LV Mains	0.40	Where the DNO to LDNO boundary is at HV or LV, the HV or LV allocation is apportioned between the DNO and LDNO based on a percentage 'HV Split' or 'LV Split' respectively, as detailed in steps d) and e) in paragraph 3.3.
	LV Services	0.35	
	Not to share	0.22	DNO incentive revenue and revenue relating to transmission exit charges are always allocated to the host DNO, and so are treated as 'upstream' revenue and not allocated to voltage levels.

**Table 1 - Illustrative PCDM Revenue Allocation to Voltage Levels**

- 3.7 The CDCM calculates the incremental cost of each network tier and allocates these costs using load characteristics specific to each tariff. It also includes a revenue matching adjustment to ensure that the total allowed revenue is recovered. An illustrative example of the effective unit rates for a hypothetical LV tariff is set out below (Table 2), which mirrors the information which can be found in the 'M-ATW' worksheet of the 2018/19 CDCM model (albeit the CDCM model includes a breakdown between assets and operating costs):

		p/kWh	Commentary
Total Charge		1.50	Revenue per customer divided by forecast units per customer. Note that, if the CDCM and PCDM were on a consistent price basis, the p/kWh calculated by the incremental cost approach would be greater than the PCDM p/kWh revenue allocation for some customer groups and less than the PCDM p/kWh revenue allocation for others, ensuring that the DNO in aggregate recovers its total allowed revenue.
Incremental Cost	EHV and above	0.48	Contribution to assets and operating costs at each voltage, as determined by the incremental cost method in the CDCM
	HV	0.22	
	HV/LV	0.08	
	LV Mains	0.10	
	LV Services	0.13	
Scaler		0.49	Revenue scaling to make up a shortfall (or correct an excess) between revenue derived from the incremental cost analysis and the DNO's revenue allowances

**Table 2 - Illustrative CDCM Incremental Cost Analysis**

3.8 The current approach used to calculate LDNO discounts is to derive a percentage discount in the PCDM by taking the sum of revenue allocated to network tiers for which the LDNO is responsible, expressed on a p/kWh basis (LDNO revenue allocation), and dividing this by total revenue, also expressed on a p/kWh basis.

3.9 As a hypothetical example, using the figures from Table 1 above, with a DNO to LDNO boundary at LV and where the 'LV Split' apportionment is 100% to the LDNO and 0% to the DNO<sup>2</sup> (i.e. where LDNOs are assumed to provide all of the LV network for users connected to their networks) the p/kWh revenue allocation to the LDNO would be given by the sum of the revenue allocation to voltage levels for which the LDNO is responsible, namely LV Services and LV Mains:

$$\begin{aligned} \text{LDNO Revenue Allocation p/kWh} &= \text{LV Mains p/kWh} + \text{LV Services p/kWh} \\ &= 0.40 \text{ p/kWh} + 0.35 \text{ p/kWh} = 0.75 \text{ p/kWh} \end{aligned}$$

3.10 Under the status quo, the LDNO discount for the provision of the LV network would then be given by this revenue allocation as a proportion of total revenue:

$$\text{Discount \%} = \frac{\text{LDNO Revenue Allocation p/kWh}}{\text{PCDM Total p/kWh}} = \frac{0.75 \text{ p/kWh}}{2.50 \text{ p/kWh}} = 30.0\%$$

3.11 This discount is then applied to the relevant all-the-way tariff in the CDCM, such that for the example LV tariff above (in Table 2) the effective p/kWh discount would be:

$$\begin{aligned} \text{Discount p/kWh} &= \text{Discount \%} \times \text{all the way tariff} = 30.0\% \times 1.50 \text{ p/kWh} \\ &= 0.45 \text{ p/kWh} \end{aligned}$$

3.12 It can be seen that the effective discount received by the LDNO is 0.30 p/kWh less than the appropriate LDNO revenue allocation derived in the PCDM for the provision of the relevant LV network (0.75 p/kWh vs 0.45 p/kWh). Obviously, different assumptions could be used to produce an outcome where the effective LDNO discount was higher than the LDNO revenue allocation derived in the PCDM – the important point is to illustrate that they will be different.

3.13 The proposer believes that the reason that the expected outcome does not materialise is because of a flawed mathematical logic being used to calculate LDNO tariffs. A discount percentage calculated using only the total cost and revenue approach in the PCDM subsequently applied to an incremental cost tariff calculated in the CDCM will not produce LDNO discounts which are reflective of a reasonable allocation of total costs of the elements of the DNO's business that are being undertaken by the LDNO unless, by pure chance, the p/kWh calculated by the incremental cost approach is identical to the PCDM p/kWh revenue allocation.

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<sup>2</sup> The Working Group acknowledges the 100% allocation of LV mains to LDNOs is extremely unlikely but has been used to simplify the calculation



3.14 It is the view of the Proposer that it would be more appropriate to use the p/kWh LDNO revenue allocation derived in the PCDM and then convert this absolute p/kWh to a percentage discount based on the all-the-way CDCM tariffs, rather than based on the total revenue in the PCDM. Such an approach would ensure that the absolute p/kWh discount received by an LDNO remains aligned with the absolute p/kWh LDNO revenue allocation calculated in the PCDM and is not distorted by the incremental cost allocation approach applied in the CDCM.

3.15 In the example above, the proposed approach would derive the LDNO discount as follows:

$$\text{Discount \%} = \frac{\text{LDNO Revenue Allocation p/kWh}}{\text{CDCM all the way p/kWh}} = \frac{0.75 \text{ p/kWh}}{1.50 \text{ p/kWh}} = 50.0\%$$

3.16 This discount would then be applied to the relevant all-the-way tariff in the CDCM:

$$\begin{aligned} \text{Discount p/kWh} &= \text{Discount \%} \times \text{all the way tariff} = 50.0\% \times 1.50 \text{ p/kWh} \\ &= 0.75 \text{ p/kWh} \end{aligned}$$

3.17 It can be seen that the effective discount received by the LDNO is now aligned with the LDNO revenue allocation derived in the PCDM for the provision of the relevant LV network (0.75 p/kWh).

#### **Limitations on the scope of DCP 266:**

3.18 The PCDM uses 2007/08 data for the calculation of LDNO discounts whilst the CDCM uses input data for the charging year. So without correction the LDNO revenue allocation (p/kWh) and the all-the-way CDCM cost (p/kWh) will be on different bases (e.g. the former will be in 2007/08 prices whilst the latter will be in nominal prices for the charging year). To resolve this, the LDNO revenue allocation calculated in the PCDM will be adjusted to take into account allowed revenue and forecast total kWh for the relevant charging year (see paragraph 4.6 onwards for detail). However, the scope of the CP is limited to those additional PCDM inputs and does not include other various cost input values to the PCDM. It is not the intent of the CP to review all data sources in the PCDM; rather the intent is to correct how the LDNO revenue allocation is converted into a percentage discount.

**Question 1** Do you agree with the proposer's view that there is a defect in the logic in the way that discounts are calculated and applied to determine LDNO tariffs?



## 4 DCP 266 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 266. This Working Group consists of DNO, Supplier, 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 The Working Group developed and issued a first consultation to gather information and feedback from industry and to aid them in refining the proposed solution. Attachment 2 contains the documentation for the first consultation and the collated responses which the Working Group made comments against.

### Consultation One

- 4.3 The first consultation was issued on 01 February 2018 seeking industry opinion on the CP and views on the proposed solution. There were thirteen respondents to the consultation, of which there was one Supplier, five DNOs, six IDNOs and one that chose to remain anonymous. Following the review of consultation responses, the Working Group agreed that the original solution required amendment. The Working Group also agreed that when issuing a second consultation, it would seek to simplify the explanation of both the solution and the background information as it was clear from responses that greater clarity was required. The Working Group's conclusions are set out at a high level in paragraph 4.4, whilst a summary of the responses received, and the Working Group's more detailed conclusions are set out at the beginning of the collated responses document, located within attachment 2.

### Working Group Conclusions Following Consultation One

- 4.4 Following review of the consultation responses, the Working Group identified the key concerns to be addressed. A high-level overview of each of the areas is set out below, grouped into those which have required a change to the proposed solution; those where greater clarity has been provided; and those where consideration of the interaction of DCP 266 with other factors is required:

#### ***Changes to the proposed solution:***

- Refine the proposed solution to resolve the unintended consequences related to the updating of input data, including:
  - Changes to LDNO discounts which would arise from inconsistencies between inputs (see page 10);
  - Concerns related to volatility of LDNO margins as a result of DCP 266 (see page 12); and
  - Understanding the cause behind the increase seen in discounts being capped due to exceeding 100% (see page 14).
- Minimise the complexity of the methodology and modelling approach, and provide better justification where complexity is needed to support the solution (see page 15).

***Provide additional clarity:***

- Ensure greater clarity around the defect is provided to enable better understanding of what DCP 266 is seeking to achieve (see page 16);
- Clearly explain the approach taken regarding EHV Generation Credits is that of the status quo (see page 16); and
- Clarify the fact that the issue of '0' Volumes is an existing issue, not caused by DCP 266 and explain why the group developed a solution to the issue (see page 16).

***Interactions with other factors:***

- Monitor any potential for either Ofgem's Targeted Charging Review (TCR) Significant Code Review (SCR) or Electricity Network Access and Forward-Looking Charging Review SCR to interact with the work being undertaken by the group and provide further detail if/when needed (see page 17); and
- Understand how, if at all, DCP 266 interacts with competition law and address concerns related to the potential impact of DCP 266 on competition (see page 17).

4.5 Further detail on the work undertaken by the Working Group on each of the items is set out under subheadings below.

**Changes to the Proposed Solution**

***Unintended Consequences of Input Data – Inconsistencies***

4.6 Consultation respondents noted a number of internal inconsistencies within the PCDM which would be created by the changes made to input data as a result of the solution proposed for DCP 266 in the first consultation. Respondents highlighted that:

1. if only the proposed updates to inputs were made with no change to the calculation method, this would result in material reductions in the LDNO discounts;
2. the proposed inputs result in a step change in the calculation of 'revenue not to share'; and
3. the proposed inputs result in a step change in the reported allocation of units distributed.

***Changes to underlying revenue allocation:***

4.7 As stated in section 3, it is not the intent of the CP to review all data sources in PCDM. Hence point 1 above is of particular concern as any change in inputs which would change the discounts calculated under the existing methodology undermines the intent of the CP to only correct how the LDNO discount is calculated and applied. The Working Group agreed to further refine the solution for DCP 266 to resolve this issue.

- 4.8 The solution proposed in the first consultation used updated units and revenue data in order to ensure that the p/kWh LDNO revenue allocation calculated in the PCDM is on a consistent basis with the all-the-way p/kWh calculated in the CDCM. If this change were not made, the p/kWh calculated in the PCDM would be based on 2007/08 revenue data whilst the all-the-way p/kWh calculated in the CDCM would be based on charging year revenue data (i.e. 2019/20 for current tariffs); hence the percentage discount derived would be artificially low as it would not take into account the effects of (for example) inflation between 2007/08 and 2019/20.
- 4.9 However, the way in which the previous solution resolved this issue was to use charging year revenue and units data for all calculations in the PCDM, including those used for the underlying allocation of revenue to voltage levels. For example, the calculation of 'revenue not to share' in the PCDM is based on 2007/08 revenue data in the existing PCDM, but the Working Group's proposed solution presented in the first consultation updated this to be based on charging year revenue data.
- 4.10 The Working Group's updated proposed solution is designed to resolve the issue of cost data relating to Distribution Price Control Review 4/5 being used in conjunction with revenue and volumes data relating to the charging year whilst not changing any of the underlying PCDM revenue allocation calculations. The proposed solution is to:
- (a) calculate the sum of revenue allocated to network tiers for which the LDNO is responsible, on a p/kWh basis using the existing PCDM (method and input data);
  - (b) uplift the value calculated in part (a) using a revenue scaler (to convert from being relative to 2007/08 revenue data to be relative to charging year revenue data) and a unit scaler (to convert from being relative to 2007/08 units to be relative to charging year units); and
  - (c) calculate an average absolute p/kWh for each tariff by dividing the total revenue collected from all tariff components of that all-the-way tariff by the total all-the-way volume associated with that tariff.
- 4.11 A discount percentage would then be calculated by dividing point (b) by point (c) above. As was the case with the previous proposed solution, the PCDM will determine a percentage discount for each combination of all-the-way CDCM tariff and DNO to LDNO boundary voltage.
- 4.12 The legal text has been clarified to be explicit on when 2007/08 units and revenue data should be used and when charging year units and revenue data should be used.

***Step change in the calculation of 'revenue not to share':***

- 4.13 The impact analysis presented as part of the first consultation showed a step change in the calculation of 'revenue not to share'. This is caused by changes to DNO price control structures (introduced by RIIO-ED1) where a greater proportion of revenue is now recovered through incentive mechanisms; and by increases in transmission exit charges paid by DNOs. Further the allocation of RIIO-ED1 price control allowances between 'revenue to share' and 'revenue not to share' proposed by the Working Group in the previous consultation was challenged by a number of consultation respondents.
- 4.14 The proposed solution resolves this issue by calculating 'revenue not to share' using the same input data as is currently used in the PCDM, with charging year data used for an additional step at the end of the process (as described in part (b) of the updated solution described in paragraph 4.10) and so the step change identified will no longer be observed.

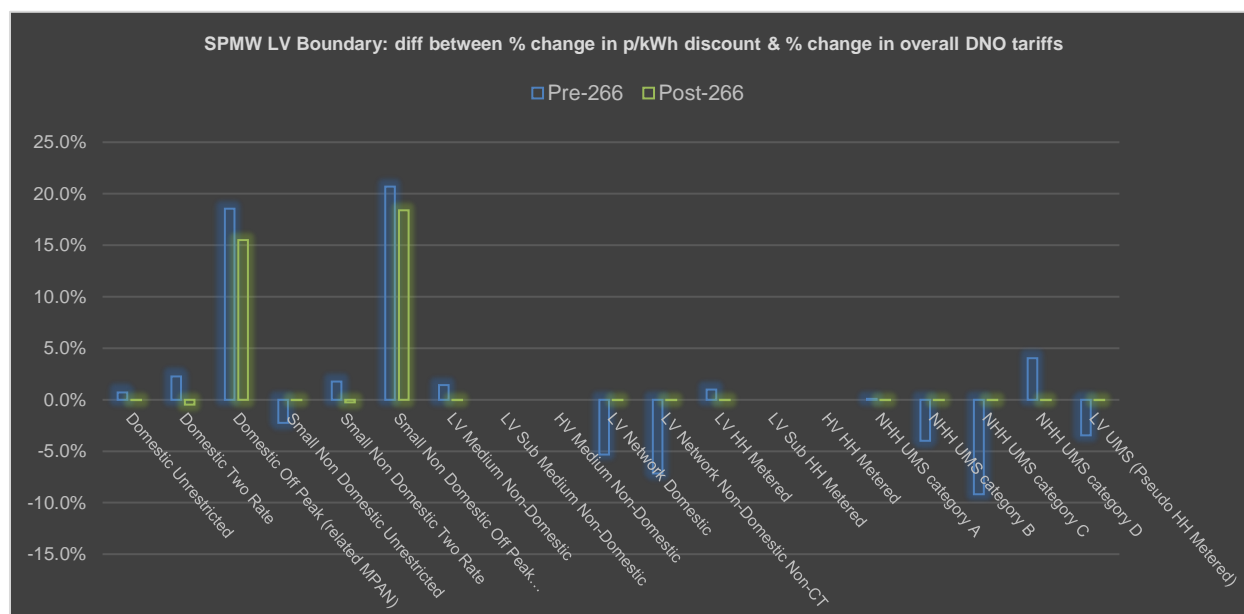
***Step change in units distributed:***

- 4.15 In the existing PCDM, 2007/08 units distributed data is input at three network levels – EHV, HV and LV. The solution proposed in the first consultation required these inputs to be updated to charging year data. Consultation respondents highlighted the inconsistency that arises if shifts in power flows through network levels are included without updating the allocation of costs or assets between those network levels.
- 4.16 The Working Group investigated the changes in the units distributed data between 2007/08 and the DNOs' latest forecasts, and, in dialogue with the DNOs, confirmed that the units distributed data provided by DNOs for the first consultation allocated units distributed to customers connected at the HV Substation level to the EHV network level, in line with the current distribution licence definition of 'designated EHV'. However, the 2007/08 data pre-dates this definition of 'designated EHV', so units distributed to customers connected at HV Substation are allocated to the HV network level in the 2007/08 data. This has been rectified in the data being used for the modelling work undertaken for this consultation, ensuring consistency with the allocation of costs in the PCDM.
- 4.17 Further, the updated proposed solution uses units distributed data from 2007/08 to determine the allocation of revenue to network levels, with charging year data used for an additional step at the end of the process (as described in part (b) of the updated solution described in paragraph 4.10); hence the inconsistency identified between the allocation of costs and assets to voltage levels and the associated power flows no longer exists.

***Unintended Consequences of Input Data – Volatility***

- 4.18 A consultation respondent highlighted a concern that annual changes are likely to undermine their perception of the beneficial effect of the CDCM on competition.

- 4.19 The view of the Working Group is that the updated solution proposed would cause a decrease in the volatility of LDNO margins when expressed on a p/kWh basis other than potentially at the point of implementation, albeit volatility will increase when LDNO margins are expressed as a percentage of CDCM tariffs. This is because, under the proposed solution, the only CDCM inputs which would impact the p/kWh LDNO margins would be the units and allowed revenue forecast, used to derive the unit and revenue scaler described in part (b) of paragraph 4.10, whilst under the status quo the p/kWh LDNO margins are impacted by all CDCM inputs.
- 4.20 The Working Group agreed to test volatility of LDNO tariffs as a result of the changes made by DCP 266. To undertake this test, the Working Group requested the DCUSA modelling consultant to provide impact assessments using CDCM and PCDM model inputs from both the 2018/19 published models and 2019/20 published models.<sup>3</sup>
- 4.21 To test the reduction in volatility brought about by DCP 266, the Working Group compared the change in p/kWh discounts between 2018/19 and 2019/20 with the overall all-the-way tariff change between these years. Under DCP 266 LDNO discounts should be protected from the volatility caused by updates to all CDCM inputs other than units and allowed revenue. By doing this it follows that the change in LDNO discounts should align more closely to the overall average all-the-way tariff change for the year. Attachment 3 contains the analysis undertaken by the Working Group, and the chart below shows the results for the SPMW region for LV boundary discounts. The chart shows that post DCP 266 there is more consistent change in LDNO discounts relative to the overall change in all-the-way tariffs.



<sup>3</sup> The only non-published input required for this was a breakdown of units distributed at EHV, HV and LV (as described in paragraph 4.17) for both years. This data was provided by DNOs for 2018/19 to enable the modelling work for the previous proposed solution and was approximated for this modelling for 2019/20 in line with the percentage change in published volume forecasts.

4.22 Charts for all regions for LV and HV boundaries are contained in the attachment and show similar reductions in volatility. One way to summarise the reduction in volatility is to take the mean of the absolute variances by tariff for each DNO region of the change in LDNO discount compared to the overall DNO tariff change. The table below shows the results of this analysis:

Mean Absolute Difference between discount change and overall ATW tariff change		
	Pre-266	Post-266
ENWL	2.2%	0.8%
NPgN	3.7%	2.9%
NPgY	2.9%	1.0%
SSEH	10.4%	1.4%
SSES	11.2%	2.6%
SPD	2.2%	1.4%
SPMW	4.7%	1.8%
LPN	12.2%	2.5%
SPN	6.8%	2.7%
EPN	4.7%	2.5%
EMID	2.9%	0.7%
WMID	3.7%	0.6%
SWEST	3.6%	0.9%
SWALES	2.3%	0.5%
Overall	5.3%	1.7%

4.23 It should be noted that whilst volatility can be demonstrated to reduce under DCP 266, it is not removed. LDNO discounts can still change materially year on year due to changes in DNO allowed revenues and assumptions on units distributed. For instance, between 2018/19 and 2019/20 the overall change tariffs in the SPMW region was 16.1%. The Working Group analysis set out in Attachment 3 shows that pre-DCP 266 the change in LV boundary LDNO discounts for SPMW would range between 6.9% - 20.1% (excluding off peak related MPAN tariffs), whilst post DCP 266 they would range between 15.6% - 16.0%.

#### ***Unintended Consequences of Input Data – Capped Discounts***

4.24 The Working Group noted in the previous consultation that, in general, LDNOs shouldn't be paid to use the DNO's network (i.e. discounts should not exceed 100%), and so both the original proposed solution presented in the first consultation and the updated solution maintain the existing principle that discounts are capped at 100%. The Working Group noted views of respondents regarding the possibility of the provision of services by LDNOs to DNOs in a future with dynamic networks with relation to discounts existing over 100%, but consider that introducing LDNO discounts in excess of 100% is beyond the scope of this CP.

4.25 Consultation respondents raised concerns over the increase in the number of tariff and DNO to LDNO boundary voltage combinations which resulted in LDNO discounts being capped at 100% when compared to the status quo of 81, with 923 instances identified (32.8%) under the solution proposed in consultation one. The updated solution results in 756 identified instances of LDNO discounts being capped at 100% which is 26.9% of tariffs.

4.26 Of particular interest to the Working Group was the number of LDNO customers impacted by capped discounts under each solution. In total across all DNO areas there are 621,014 customers connected to LDNO networks. As can be seen in the table below, there is a large decrease in the numbers of customers being impacted by the tariffs being capped at 100% under both the original and updated solutions.

	Status Quo	First Solution	Updated Solution
Number of LDNO customers Impacted	3,156	146	243
Percentage of LDNO customers Impacted	0.508%	0.024%	0.039%
Number of DNO areas where capping impacts customers	1	3	4

### Complexity of the solution

4.27 Consultation respondents highlighted concerns around the complexity of the proposed solution for DCP 266. The Working Group noted that the legal text changes required to implement the change are in fact relatively simple, with the complexity arising as a result of a circularity created between the PCDM and CDCM model. The diagram below is a visual representation of the circularity created between the PCDM and CDCM model.





- 4.28 The circularity arises because the all-the-way CDCM tariffs vary depending on the level of LDNO discount percentages – if LDNO discount percentages increase, the revenue derived from LDNO tariffs decreases, and so in order to target allowed revenue more revenue is recovered through scaling in the CDCM. The revenue allocated to LDNOs in the PCDM in p/kWh is not impacted by this circularity but the discount percentages are determined based on the revenue allocated divided by the average all-the-way CDCM p/kWh which causes the circularity. The circularity occurs because the LDNO discount percentages calculated in the PCDM vary depending on the average p/kWh of the all-the-way tariff calculated in the CDCM, but the all-the-way tariffs themselves vary depending on the level of LDNO discounts.
- 4.29 Since the previous consultation, the Working Group has refined the solution, which does not remove this circularity but does reduce its impact, by carrying out the full calculation of the p/kWh allocation of revenue to network tiers based entirely on 2007/08 data and then scaling to charging year data. The secretariat has also appointed a new modelling consultant and so have had the opportunity to take a different approach to the implementation of the revised solution. The updated modelling does not attempt to resolve the circularity but leaves this task to the DNOs to undertake when populating the models.

### **Providing Additional Clarity**

#### ***The Defect***

- 4.30 The Working Group noted that responses to the consultation indicated that the defect that DCP 266 is seeking to amend had not been defined clearly enough, with some respondents stating that they did not agree with the view that a defect exists.
- 4.31 The Working Group has updated the rationale for stating that a defect exists throughout sections one and three of this document and has also updated the example initially provided which outlined the approach to calculating LDNO discounts.

#### ***EHV Generation Credits***

- 4.32 The Working Group noted that the issues raised in response to the consultation question on the same related topic of generation credits are out of scope of this CP. It was clarified that the intent of this CP is not to amend the way the generation credits are determined but to change the way they are applied when determining LDNO discounts (i.e. from a percentage discount to a p/kWh approach, consistent with the intent of the CP for demand charges).

#### ***Zero Volumes***

- 4.33 The Working Group noted that the issue around zero volumes is an existing issue in the CDCM, whereby if a volume forecast of zero units is entered for some tariffs, the resulting tariffs may not be cost-reflective for any customer subsequently utilising that tariff.

4.34 The solution for DCP 266 requires a non-zero kWh volume forecast for every all-the-way tariff in order to calculate an average p/kWh for that tariff (part (c) of the proposed solution detailed in paragraph 4.10). The solution to this issue has been refined to stipulate (in the legal text of Schedule 16) that DNOs will need to include a forecast non-zero number of customers and associated volumes for all customer groups.

### **Interactions with other factors**

#### ***TCR SCR and Electricity Network Access and Forward-Looking Charging Review SCR Interaction***

4.35 The Working Group's comments related to this area are contained in section 6 below.

### ***Competition***

4.36 During its review of responses to the first consultation the Working Group noted respondents' concerns around the implications to competition as a result of DCP 266. The Working Group was specifically interested in how DCP 266 interacts, if at all, with competition law and questioned, in general, to what revenues a party which is providing substitute services in place of a dominant party should be entitled.

4.37 The Working Group discussed two interpretations:

1. The party providing the substitute service should be entitled to the same level of revenue which the dominant party derives in respect of the service which is being substituted; or
2. The party providing the substitute service should be entitled to the level of revenue which the dominant party would derive in respect of the service which is being substituted if the dominant party's business were notionally split into an element which provides the service being substituted and an element providing the remainder.

4.38 In the context of a DNO being the dominant party and an LDNO substituting the provision of services at (for example) low voltage, the two interpretations result in the following:

1. The LDNO should be entitled to the revenue which the DNO derives in respect of the provision of services at low voltage. Such revenue is determined by the CDCM which generates forward looking cost signals and so does not necessarily reflect the cost incurred in providing the service to each group of users; rather it generates cost signals to incentivise user behaviours which can reduce the long-run costs of operating the DNO's network, with the DNO's total costs and return recovered in aggregate across all user groups through 'revenue matching' or 'scaling'; or
2. The LDNO should be entitled to the revenue which the DNO would derive from providing low voltage services if the DNO's business were notionally split into a portion providing higher voltage services and a portion providing lower voltage services. In order to approximate the revenues which the notional entity providing low voltage services would derive, it may be reasonable to assume that such a notional entity would be subject to a similar price control

mechanism as the DNO is itself, and so such revenues would be determined based on an analysis of the costs and required return of providing low voltage services.

4.39 The solution for DCP 266 aligns to the second of these interpretations.

**Question 2 Do you have any comments on the two interpretations set out under paragraph 4.37.**

## DCP 266 Solution

4.40 As detailed in paragraphs 4.10 and 4.11, the proposed solution is to:

- (a) calculate the sum of revenue allocated to network tiers for which the LDNO is responsible, on a p/kWh basis using the existing PCDM (method and input data);
- (b) uplift the value calculated in part (a) using a revenue scaler (to convert from being relative to 2007/08 revenue data to be relative to charging year revenue data) and a unit scaler (to convert from being relative to 2007/08 units to be relative to charging year units);
- (c) calculate an average absolute p/kWh for each tariff by dividing the total revenue collected from all tariff components of that all-the-way tariff by the total all-the-way volume associated with that tariff; and
- (d) determine a discount percentage by dividing the result of part (b) by the result of part (c) for each tariff.

4.41 As was the case with the previous proposed solution, the PCDM will determine a percentage discount for each combination of all-the-way CDCM tariff and DNO to LDNO boundary voltage. As a result, an amendment to both the CDCM and EDCM models will be required to enable the models to use inputs by all-the-way tariff and DNO to LDNO boundary voltage.

**Question 3 Do you have any comments on the proposed solution and do you believe it addresses the defect identified?**  
**Are there any alternative solutions that should be considered?**

## 5 Relevant Objectives

### Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 4.

DCUSA Charging Objectives	
1	that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence
2	that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)
3	that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business
4	that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business
5	that compliance by each DNO Party with the Charging Methodologies facilitates 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.
6	that compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.

- 5.2 When this change was proposed, both the General and Charging Objectives were to be considered when assessing whether the change would better facilitate the Objectives. Since the implementation of DCP 275 'Code Governance Review 3 & SLC 22' which introduced a final Charging Objective that aligned both sets of Objectives, any CP which changes the charging methodologies needs only be assessed against the Charging Objectives. Therefore, only the DCUSA Charging Objectives should be considered when assessing the impact of DCP 266.

5.3 The Proposer believes that DCUSA Charging Objective 2 will be better facilitated by reducing or removing the current distortion in the absolute level of total avoided cost discount received by LDNOs by ensuring that the absolute total cost discount calculated in the PCDM is not affected by the CDCM for all-the-way tariffs or changes to it. The Proposer believes that there is currently a logical defect in the approach to calculating and applying LDNO discounts which results in LDNO charges which do not reflect *“a reasonable allocation of total costs to the elements of the DNOs business that are being undertaken by the IDNO”*. DCP 266 removes this defect and by ensuring that the p/kWh discounts received by LDNOs remains aligned with the absolute level of avoided costs calculated in the PCDM, this change will promote competition in the distribution of electricity. The Proposer believes the absolute level of discount (p/kWh) received by LDNOs is also likely to be more stable and predictable since it will be protected from the impact of any changes to the methodology for all-the-way CDCM tariffs, which will also promote competition in the distribution of electricity.

**QUESTION 4:** Do you consider that the proposal better facilitates the DCUSA Charging Objectives?

- If so, please detail which Charging Objectives are better facilitated by DCP 266 and provide your rationale.
- If not, please detail which Charging Objectives are not better facilitated by DCP 266 and provide your rationale.

## 6 Impacts & Other Considerations

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

6.1 The Working Group does not consider at this stage, there to be any cross-code impact.

#### **TCR SCR Interaction**

6.2 The Working Group noted that currently DCP 266 does not impact on the TCR SCR as there is no element of residual charges in scope of DCP 266. It is noted that a ‘minded to’ consultation by Ofgem on the TCR was released on 28 November 2018 and closed on 04 February 2019.

#### **Electricity Network Access and Forward-Looking Charging Review SCR Interaction**

6.3 Following Ofgem’s consultation issued on 23 July 2018, it was noted that on 18 December 2018 Ofgem published its decision to launch an SCR entitled ‘Electricity Network Access and Forward-looking Charging Review’. The documentation with that decision included the scope and form of the review.

- 6.4 The Working Group noted that during the January 2019 Distribution Charging Methodologies Development Group meeting, members discussed all in-flight charging methodology CPs to determine their interaction with this SCR and whether any steps should be taken in their development. The Proposer noted that DCP 266 would break the link between the all-the-way tariff and the LDNO discounts and therefore, by continuing to progress the CP, there is an opportunity to realise some indirect benefits. It is the Proposer's view that if the CP needs to be withdrawn then the work would need to be considered under the SCR.
- 6.5 In conclusion, the Proposer of DCP 266 is of the view that the CP should continue to progress alongside the SCR. The Working Group share this view.

## Consumer Impacts

- 6.6 The Working Group considered that this change would benefit from Parties being able to understand its impact in modified models with impact estimates. The DCP 266 modelling documentation acts as Attachment 5. The CDCM model, EDCM model and PCDM have been modified to incorporate the proposed solution.
- 6.7 An amended Annual Review Pack (ARP) will also be needed due to the close linkage with the CDCM, however the necessary amendments won't be carried out until such time that it is needed, being prior to submitting the Change Report.
- 6.8 DNO Working Group members have successfully populated the DCP 266 models and replicated the expected resulting outputs.

## Impact Assessment

- 6.9 Following the modelling work, the Working Group requested for CEPATNEI, as the DCUSA modelling consultants, to undertake an impact assessment. Attachment 6 contains the results of the impact assessment, including a document that details the overall effect of DCP 266. In the commentary document, it was noted that DCP 266 causes discounts to diverge in percentage terms, but to converge to the same p/kWh value for the same boundary level.



6.10 The graphs above illustrate the basic effect for one DNO (ENWL) for one boundary level (LV). Whereas before DCP 266, percentage discounts were consistent across tariffs – leading to inconsistent discounts per kWh, after DCP 266 each tariff receives a different % discount – leading to a consistent discount per kWh.

6.11 The following table summarises the impact of DCP 266 on core all-the-way tariffs. The complete dataset by licensee and including all tariffs can be found at attachment 6 ('CDCM per kWh' tab of the 2018/19 Impact Assessment spreadsheet).

% Change in Average p/kWh for all-the-way tariffs	GB Min	GB Average	GB Max
Domestic Unrestricted	( 0.04%)	0.02%	0.08%
Small Non Domestic Unrestricted	( 0.03%)	0.02%	0.09%
LV HH Metered	( 0.03%)	0.03%	0.21%
HV HH Metered	( 0.01%)	0.02%	0.10%
LV UMS (pseudo HH Metered)	( 0.03%)	0.01%	0.09%

6.12 The impact of DCP 266 on LDNO discounts differs by tariff, by DNO-LDNO boundary level, and by DNO area. For most tariffs, in most DNO areas, and at most boundary levels, DCP 266 would raise percentage discounts. But for some high-volume tariffs, notably 'Domestic Unrestricted', DCP 266 would lower discounts in most cases.

6.13 Taking all DNO areas together, these impact assessments suggest that DCP 266 would increase LDNO margins at CDCM boundary levels<sup>4</sup> by £897,568 (+2.29%) in 2018/19, and £800,125 (+1.55%) in 2019/20. The impact for individual LDNOs will differ according to the profile of their customer bases. The aggregate impact for 2018/19 is summarised in the table below (note the £0.1m change in overall revenue is simply a result of tariff rounding rather than an underlying change in revenue allowances):

DNO Revenue (£m) From...	Pre-DCP 266	Post-DCP 266	Change
DNO customers	5,352.7	5,353.7	1.0
LDNO customers with boundary at LV	13.6	13.7	0.1
LDNO customers with boundary at HV	29.3	28.3	( 1.0)
All Customers	5,395.6	5,395.7	0.1

<sup>4</sup> i.e. Not including discounts applied within the EDCM model, for which input data was not available to the modelling team.

Discounts applied in the CDCM model account for 98% of LDNO customers.



6.14 The following tables show the impact of DCP 266 on the LDNO margin expressed as a percentage of the host DNO ATW charge in respect of the above five tariffs for DNO/LDNO boundary at LV and HV respectively. The complete dataset by licensee and including all tariffs can be found at attachment 6 ('% Discount' tab of the 2018/19 Impact Assessment spreadsheet).

Change to LDNO margin as a percentage of the host DNO all-the-way charge at LV boundary	GB Min	GB Average	GB Max
Domestic Unrestricted	( 6.0%)	( 1.9%)	1.0%
Small Non Domestic Unrestricted	( 0.8%)	5.6%	13.4%
LV HH Metered	0.2%	4.0%	9.4%
HV HH Metered			
LV UMS (Pseudo HH Metered)	( 10.9%)	0.8%	17.9%

Change to LDNO margin as a percentage of the host DNO all-the-way charge at HV boundary	GB Min	GB Average	GB Max
Domestic Unrestricted	( 9.6%)	( 3.3%)	1.6%
Small Non Domestic Unrestricted	( 1.4%)	9.4%	23.2%
LV HH Metered	0.3%	6.8%	15.0%
HV HH Metered	( 12.5%)	( 5.1%)	( 0.4%)
LV UMS (Pseudo HH Metered)	( 17.6%)	1.2%	28.4%

6.15 The following table sets out a summary of the impact that DCP 266 has on Domestic Unrestricted tariffs at different boundary levels. It provides a summary of 2018/19 charges before and after the application of DCP 266, alongside the impact of DCP 266 in absolute terms and as a percentage of the equivalent margin before the application of DCP 266. Charges are calculated on the Domestic Unrestricted tariff using an annual consumption figure of 3,100kW/h.

	2018/19 charges excluding DCP 266			2018/19 charges including DCP 266			Net impact of DCP 266					
	DNO ATW (£/annum)	IDNO Margin		DNO ATW (£/annum)	IDNO Margin		ATW charge		IDNO LV:LV		IDNO HV:LV	
		LV:LV	HV:LV		LV:LV	HV:LV	£/annum	% change	£/annum	% change	£/annum	% change
Electricity North West	£80.14	£28.63	£46.10	£80.14	£26.76	£43.09	£0.00	0.00%	-£1.87	-6.52%	-£3.01	-6.53%
NPG Northeast	£87.61	£34.86	£55.83	£87.61	£32.52	£52.11	£0.00	0.00%	-£2.34	-6.71%	-£3.72	-6.67%
NPG Yorkshire	£74.57	£29.25	£46.51	£74.63	£29.51	£46.93	£0.06	0.08%	£0.26	0.89%	£0.42	0.90%
SSEN SEPD	£75.67	£25.80	£43.66	£75.71	£24.54	£41.48	£0.04	0.05%	-£1.26	-4.89%	-£2.18	-5.00%
SSEN SHEPD	£126.07	£36.22	£75.40	£126.07	£32.66	£67.92	£0.00	0.00%	-£3.56	-9.83%	-£7.48	-9.92%
UKPN EPN	£77.38	£23.86	£38.23	£77.35	£19.19	£30.77	-£0.03	-0.04%	-£4.67	-19.57%	-£7.45	-19.50%
UKPN LPN	£65.58	£17.67	£30.48	£65.62	£16.44	£28.39	£0.03	0.05%	-£1.22	-6.92%	-£2.09	-6.85%
UKPN SPN	£83.67	£26.17	£43.53	£83.67	£22.75	£37.91	£0.00	0.00%	-£3.42	-13.05%	-£5.62	-12.90%
WPD East Midlands	£72.46	£21.83	£34.86	£72.46	£21.39	£34.16	£0.00	0.00%	-£0.45	-2.04%	-£0.70	-2.00%
WPD South Wales	£101.27	£33.08	£64.51	£101.34	£32.83	£64.03	£0.07	0.07%	-£0.25	-0.77%	-£0.48	-0.74%
WPD South West	£102.48	£38.20	£63.42	£102.48	£36.99	£61.38	£0.00	0.00%	-£1.21	-3.17%	-£2.04	-3.22%
WPD West Midlands	£81.89	£27.28	£42.02	£81.96	£28.14	£43.36	£0.07	0.08%	£0.86	3.17%	£1.34	3.19%
SPEN SPM	£101.37	£38.13	£60.77	£101.34	£35.38	£56.41	-£0.03	-0.03%	-£2.75	-7.22%	-£4.36	-7.18%
SPEN SPD	£93.22	£36.07	£60.89	£93.22	£33.83	£57.15	£0.00	0.00%	-£2.24	-6.20%	-£3.74	-6.14%

6.16 Attachment 7 contains the backing data which has been used to build this summary table.

## Environmental Impacts

- 6.17 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 266 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

- 6.18 Ofgem has been engaged throughout the development of DCP 266 as an observer of the Working Group.

## 7 Implementation

- 7.1 The proposed implementation date for DCP 266 is 1 April 2021.

**QUESTION 5:** If DCP 266 were to be approved are you supportive of the proposed implementation date of 01 April 2021?

## 8 Legal Text

- 8.1 The proposed DCP 266 legal text has been provided as Attachment 8, which the Working Group has drafted with support from the DCUSA modelling consultants.
- 8.2 The legal text seeks to change the calculation of an LDNO percentage discount so that the LDNO revenue allocation (p/kWh) calculated in the PCDM relative to 2007/08 units and revenue data is uplifted to be relative to charging year units and revenue data and is then compared with the average p/kWh figure for each all-the-way CDCM tariff in order to determine the LDNO percentage discount factor to be applied to each of the tariff components of the CDCM all-the-way tariff.
- 8.3 As described in paragraph 6.6 and 6.7, there is a need to also update the models for the CDCM, EDCM and ARP which in turn, necessitates amendments to the introductory paragraphs of each of the applicable Schedules, being 16, 17, 18 and 20. The proposed legal text captures the necessary amendments to each Schedule with respect to the model version number and date at which the methodology is effective.

**QUESTION 6:** Do you have any comments on the proposed legal text for DCP 266?

## 9 Code Specific Matters

### Reference Documents

- 9.1 Not applicable.

## 10 Consultation Questions

10.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you agree with the proposer's view that there is a defect in the logic in the way that discounts are calculated and applied to determine LDNO tariffs?
2	Do you have any comments on the two interpretations set out under paragraph 4.37?
3	Do you have any comments on the proposed solution and do you believe it addresses the defect identified? Are there any alternative solutions that should be considered?
4	Do you consider that the proposal better facilitates the DCUSA Charging Objectives? <ul style="list-style-type: none"> <li>If so, please detail which Charging Objectives are better facilitated by DCP 266 and provide your rationale.</li> <li>If not, please detail which Charging Objectives are not better facilitated by DCP 266 and provide your rationale.</li> </ul>
5	If DCP 266 were to be approved are you supportive of the proposed implementation date of 01 April 2021?
6	Do you have any comments on the proposed legal text for DCP 266?
7	Do you have any other comments on DCP 266?

10.2 Responses should be submitted using Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than, **15 May 2019**.

10.3 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.

## 11 Attachments

- Attachment 1 – DCP 266 Consultation Response Form
- Attachment 2 – DCP 266 Consultation One & Collated Responses
- Attachment 3 – DCP 266 Volatility Test Analysis
- Attachment 4 – DCP 266 Change Proposal Form
- Attachment 5 – DCP 266 Modelling Documentation
- Attachment 6 – DCP 266 Impact Assessment Documentation
- Attachment 7 – DCP 266 Data Set for Domestic Unrestricted Summary Table
- Attachment 8 – DCP 266 Proposed Legal Text