

DCP 400:

Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator

Date raised: 21 January 2022

Proposer Name: Carl Dennis

Company Name: Shell Energy

Company Category: Supplier

01 – Change Proposal

02 – Consultation

03 – Change Report

04 – Change Declaration

Purpose of Change Proposal:

To allow Alt HAN Co, acting as a Crowded Meter Room Co-ordinator to commission necessary works, using a shared Meter Equipment Manager, to resolve meter room issues to enable the installation of Smart and Alt HAN equipment.



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 400 'Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator'.

The Working Group recommends that this Change Proposal should proceed to Consultation.

Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by **26 July 2022**.

A briefing session will be held on **Monday, 18 July 2022** at 10am to walk respondents through the background of CMRs and the nature of this change. If you would like to participate in this, please email DCUSA@electralink.co.uk.

The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).



Impacted Parties: DNOs, IDNOs, Suppliers



Impacted Clauses: Introduction of new Section 2H

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Any questions?

Contact:

Code Administrator



DCUSA@electralink.co.uk



0207 432 3011

Proposer:

Carl Dennis



David Jones (Proposers

Alternate)

david.jones@althanco.com



07850264678

Timetable

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

Change Proposal timetable

Activity	Date
Initial Assessment Report	16 February 2022
Consultation Issued to Industry Participants	05 July 2022
DCP 400 briefing session	18 July 2022
Change Report Approved by Panel	17 August 2022
Change Report issued for Voting	19 August 2022
Party Voting Closes	12 September 2022
Change Declaration Issued to the Authority	14 September 2022
Authority Decision	October 2022
Implementation	If approved, 10 Working Days after Authority decision

1 Summary

What?

- 1.1 To amend the DCUSA to allow Alt HAN Co, acting as a Crowded Meter Room Co-ordinator to commission necessary works, using a shared Meter Operator, to resolve meter room issues that enable the installation of Smart and Alt HAN equipment.
- 1.2 In addition, it is believed that the following additional changes will be necessary:
 - (i) That Alt HAN Co becomes a signatory to the DCUSA; and
 - (ii) Data sharing provisions are established between Alt HAN Co as the Crowded Meter Room Co-ordinator, Suppliers and Network Operators for the purposes of identifying building network owners, landlords/owners.

Why?

- 1.3 This change would allow Alt HAN Co to establish a mechanism by which it could investigate and resolve issues related to Crowded Meter Rooms, on behalf of all affected stakeholders, to enable the installation of Smart and Alt HAN equipment allowing smart benefits to flow to those consumers. This solution has emerged from previous analysis and consultation in 2020 and 2021 to explore the issues associated with physical impediments to installing Alt HAN or Smart Metering equipment. A coordinated solution was identified as the most efficient approach to address the issues and a Target Operating Model (TOM) developed in advance of bringing forward any code change. This can be found within Attachment 2.
- 1.4 By implementing a collective solution to enable meter rooms to be Smart and Alt HAN ready, this would allow for the co-ordination of actions across multiple Resolving Parties (e.g. building owner, Suppliers and network operators) and jurisdictions minimising the number of aborted installations, and associated smart abort costs, for Energy Suppliers and allowing for a more cost effective use of industry resources and less disruptive experience for consumers.
- 1.5 The option of data sharing in 1.2(ii) would support both the Crowded Meter Room Co-ordinator and Network Operators in being able to access the data needed to resolve issues with building access and contacts for permission for works.

How?

- 1.6 This change would amend the DCUSA to allow Alt HAN Co Ltd, acting as the Industry Coordinator¹ on behalf of Energy Suppliers to orchestrate resolutions in a Crowded Meter Room by coordinating with capable resolving parties (Suppliers, DNOs, IDNOs and BNOs/landlords) and using a Shared MOP for commissioning the necessary assessment of the meter room issues and, where it is economic to do so, instruct resolution works. In doing so, the Crowded Meter Room Co-ordinator would accept liability for such works on behalf of Energy Suppliers (for which the Crowded Meter Room Co-ordinator will need to become a DCUSA Party). Alt HAN will initially conduct a pilot of the Crowded Meter Room Coordination.

2 Governance

Justification for Part 1 and Part 2 Matter

- 2.1 This Change Proposal should be treated as a Part 1 Matter as it is likely to have an impact on commercial activities connected to the distribution and supply of electricity (i.e., which premises can receive smart metering) as per DCUSA Clause 9.4.2(D).

3 Why Change?

Background of DCP 400

What is Alt HAN?

- 3.1 Energy Suppliers are obligated to take all reasonable steps to install smart meters in GB domestic and smaller non-domestic premises. A smart metering installation will include gas and electricity smart meters, an In-Home Display (IHD or in many cases a Pre-Payment Metering Interface Device (PPMID) may be provided) and a Communications Hub (CH). Within the customer's premises, these Devices will communicate with each other via a Home Area Network (HAN). However, in some premises there is a HAN Coverage 'gap' and this will require additional equipment to extend the range of the HAN in order to connect all of the smart metering devices to the customer premises. Alt HAN Co was established to allow energy Suppliers to collectively meet their obligations in licence and under Section Z of the Smart Energy Code (SEC) to resolve the HAN coverage gap. The Alt HAN solution utilises equipment known as Alt HAN Bridges to establish the HAN. One of the Alt HAN Bridges is always wired at the electricity meter and therefore sufficient space is required around that meter to install the Alt HAN Bridge.

¹ The CMRC would work under direction from the Alt HAN Forum and would only commission works, where such activity has met an Economic Test as agreed by Relevant Energy Suppliers.

What is a Crowded Meter Room?

- 3.2 Crowded Meter Room, is a scenario whereby a Meter Room or Meter Cupboard, containing a collocation of Meter Points is space constrained by inhibiting factors, resulting in challenges to installing or replacing Metering infrastructure, specifically Alt HAN Equipment. In addition, some SMETS2 installations could be prohibited without corrective works.
- 3.3 In some buildings the Home Area Network (HAN) cannot extend from the ESME to the customer property. In this instance an energy Supplier could utilise the Alt HAN solution. However there needs to be sufficient space to install the necessary equipment (an ESME and the Alt HAN Wired Bridge Device) to establish a HAN with the associated premises in the building (Multi Dwelling Units (MDU)), or any associated remote Gas Meter Points (GSME / MPRNs).
- 3.4 Without a process/mechanism for resolving CMRs, it will be the case that Suppliers are unable to fully deploy solutions to establish the HAN for all Alt HAN Candidates (and potentially any corresponding SMETS2 candidates).
- 3.5 By allowing this change to be made to the DCUSA, Alt HAN Co, acting as a Crowded Meter Room Co-ordinator would be enabled to coordinate necessary metering works in order to find resolutions for CMRs.
- 3.6 A change to DCUSA is required to allow Alt HAN Co, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs. Permission is likely to be required, depending on the resolution, from:
- a. Distributors, because the CMRC would potentially need to do work on Distribution network assets;
 - b. Electricity Suppliers, because the CMRC would potentially need to move meters;
 - c. the meter asset providers, who make these meters available to the electricity suppliers; and
 - d. the building owner (Building Network Operator – BNO).
- 3.7 Consent could be obtained from all licensed electricity Distributors and from all licensed electricity Suppliers by amending the DCUSA.
- 3.8 In addition, consideration should be given to the opportunity for data sharing between the Crowded Meter Room Co-ordinator and Network Operators over who the BNO and or/landlords are for particular buildings.

Question 1: Do you understand the intent of DCP 400?

Question 2: Are you supportive of the principles of DCP 400?

4 DCP 400 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 400. This Working Group consists of DNO, Supplier, AMO, NAPIT, ENA, Alt HAN, Retail Energy Code (REC) and Electrical Safety First 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.
- 4.2 As stated above, DCP 400 seeks to amend DCUSA to provide the necessary legal permissions to allow Alt HAN Co, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs using a REC accredited MEM. This CP seeks to put in place the necessary legal relationship between Alt HAN Co, Distributors and Electricity Suppliers. The below paragraphs will detail what this legal relationship will look like.

Introduction to Crowded Meter Rooms

- 4.3 A CMR, is a term given by the Alt HAN Co Crowded Meter Room Project to represent a Meter Room or Meter Cupboard in a Multi Dwelling Unit (MDU / Building containing multiple premises) that contains a spatial constraint that prevents the standard installation of the proposed Alt HAN Equipment alongside the electricity meters thus preventing the ability to extend the HAN to the customers premises. In some cases, the same spatial constraints are true for the standard installation of SMETS2 Smart Meters themselves, regardless of the need for Alt HAN Equipment.
- 4.4 The constraints may be, for example, the close collocation of Meters, the proximity of Trunking, Cut-Outs, Distribution Equipment, Risers, Customer Equipment, other Building Infrastructure, and the Building Fabric itself. These constraints may sit in different jurisdictions of accountability, such as DNO, BNO, Energy Supplier or Customer.
- 4.5 Whilst the makeup of Meter Room and Meter Cupboards are generally unique across GB, the definition of a Crowded Meter Room scenario suggests a situation of Vertical or Horizontal Obstructions (such as Trunking, Cut-Outs, Isolation Switches, Risers, Distribution Equipment and Customer Owned Equipment or other Building Infrastructure) that produce a spatial constraint that prevents the straightforward installation of Alt HAN Equipment, and in some cases SMETS2 Meters and Comms Hubs. The resolution of these issues may sit across multiple jurisdictions of Energy Suppliers, MOPs, DNOs, IDNOs, BNOs, landlords and Customers.
- 4.6 DCP 400 seeks to amend DCUSA to provide the necessary legal permissions to allow Alt HAN Co, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs via a REC-accredited Meter Equipment Manager (MEM).

Scope of Works

- 4.7 The Working Group discussed the scope of work that Alt HAN Co should be able to undertake when acting as a CMRC. The Working Group believe the work should include the following:

- (a) repositioning meters, cabling, local cut outs/isolation points and customer isolation switches;
- (b) removing and disposing of inhibitive trunking and cable trays;
- (c) removing and disposing of redundant equipment; and/or
- (d) removing, disposing of and replacing aged equipment.

4.8 The Working Group believe that the above works may be reasonably required to maximise the available space within a meter room or meter cupboard, in order to enable the installation of Relevant Alt HAN Equipment and/or Smart Metering equipment. This CP will facilitate the necessary DCUSA updates to establish the legal relationship between Alt HAN Co, Distributors and Suppliers.

New Section 2H of DCUSA

4.9 It is proposed that there will be a new Section 2H added to DCUSA. This Section will set out the terms and conditions pursuant to which each DNO/ IDNO Party and each Supplier Party shall allow the Crowded Meter Room Coordinator to undertake Crowded Meter Room Works.

4.10 This new Section will set out the following:

- Crowded Meter Room Works will be defined as below:

means works which are reasonably required to maximise the available space within a meter room or meter cupboard, in order to enable the installation of Relevant Alt HAN Equipment and/or Smart Metering equipment, including:

- (a) repositioning meters, cabling, local cut outs/isolation points and customer isolation switches;
- (b) removing and disposing of inhibitive trunking and cable trays;
- (c) removing and disposing of redundant equipment; and/or
- (d) removing, disposing of and replacing aged equipment.

- Work is limited to Whole Current Metering only
- Any and all de-energisation Works, Crowded Meter Room Works and Re-energisation Works carried out pursuant to Section 2H shall only be carried out with the permission of the Customer.
- Section 2H will not imply any permission by the Customer (i.e., permission of the customer will always need to be pursued separately) and will make clear that the works pursuant to Section 2H are not undertaken on behalf of the Distributor. The CMRC must make clear to the Customer (and to the occupier if different) that the CMRC is not acting on behalf of the Distributor.
- The CMRC shall act in accordance with Good Industry Practice when carrying out, or procuring the carrying out of, any and all works pursuant to Section 2H.

- The CMRC shall only be entitled to exercise rights under Section 2H via a contractor which is accredited as a Meter Equipment Manager under the Retail Energy Code. The CMRC shall ensure that all of its contractors which undertake works pursuant to this Section 2H do so in compliance with the Retail Energy Code (REC) Meter Operation Code of Practice.
- Section 2H will state that if the CMRC wishes at any time to undertake Crowded Meter Room Works, consent is given from the DNO, IDNO and Supplier Parties provided that the CMRC's Shared MOP Re-energises that Exit Point and/or Entry Point as soon as reasonably practicable thereafter.
- Section 2H will state the CMRC's Shared MOP shall only be entitled to Re-energise an Exit Point and/or Entry Point that has been De-energised by (or on behalf of) the CMRC pursuant to Section 2H (i.e. if found De-energised then no Re-energisation works will be carried out).
- Section 2H will state that DNO, IDNO and Supplier Parties consent to the CMRC interfacing with their equipment to the extent it is necessary to do so in exercising the CMRC's rights, or complying with its obligations, under Section 2H. The CMRC shall not otherwise interfere with their equipment.
- Provision of information to the Distributer and Supplier (detailed further below)
- A liability clause (detailed further below)

Provision of Information to DNO, IDNO and Electricity Supplier Parties

- 4.11 The CMRC will eventually need to have the ability to send communications to the DNO and the Registered Supplier using Market Messages (DTC flows) over the Data Transfer Network. This will require the CMRC to be set up as a new Role Code, and for the relevant Market Messages to include new Scenario Variants where the CMRC will send and receive information between the CMRC and the Registered Supplier and/or the DNO/ IDNO. To enable this, some system changes will be required and this is being captured within a corresponding REC Change R0043.
- 4.12 However for the purposes of the initial pilot Alt HAN will need to utilise a separate mechanism for communications that does not depend on the R0043 change.
- 4.13 Section 2H of DCUSA will stipulate what information should be provided to DNO, IDNO and Electricity Supplier Parties.
- 4.14 The CMRC will be expected to report any dangerous incidents and damage to the relevant DNO/ IDNO Party as they currently do now as a REC accredited MEM. If this is a Category A situation, then the CMRC will ensure that the DNO/ IDNO is notified by telephone in a prompt and appropriate manner having regard to the nature of the incident to which the report relates.

- 4.15 Where the CMRC comes across any matter or incident that is a Category B Situation, then the CMRC shall ensure that the DNO/ IDNO is notified of such report or enquiry using the Market Message MM00023 (Data Transfer Network - data flow D0135), except for the pilot where an alternative means of communication will be used. As stated above the REC Change R0043 will make changes to the Market Messages to allow for a CMRC to be set up as a new Role Code to enable these flows to be sent.
- 4.16 The DCUSA will also place an obligation on the CMRC to notify the Electricity Supplier where the following occurs:
- the flow of electricity through an Exit Point has been interrupted (and remains interrupted);
 - there has been interference with any electricity metering equipment that has prevented such metering equipment from correctly registering the quantity of electricity supplied; and/or
 - the electricity metering equipment otherwise presents a danger,
- 4.17 The provision of information Clauses are set out in Section 2H, within the legal text (Attachment 3).

Liability

- 4.18 Section 2H will state that the CMRC shall indemnify DNO, IDNO and Electricity Supplier Parties against all actions, proceedings, costs, demands, claims, expenses, liability, loss or damage arising directly from physical damage to the property of any person caused by the CMRC in exercising the CMRC's rights under Section 2H (but excluding liability for any loss of profit, loss of revenue, loss of use, loss of contract or loss of goodwill, and subject to a cap of £1 million per incident or series of related incidents).
- 4.19 Within DCUSA there is an existing liability clause between DNOs, IDNOs and Suppliers in relation to working on each other's assets. The suggestion within Paragraph 4.18 above follows the same principle.
- 4.20 The full legal Text for DCP 400 can be found in Attachment 3.

Question 3: Do you agree that the permitted works for a CMRC detailed in Paragraph 4.7 may be reasonably required to maximise the available space within a meter room or meter cupboard, in order to enable the installation of Relevant Alt HAN Equipment and Smart Metering equipment? Please provide your rationale.

Question 4: Do you have any comments on the proposed provision of information Clauses set out in Section 2H of the legal text?

Question 5: Do you agree that the liability clause within Section 2H should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electricity Supplier Parties? Please provide your rationale.

Question 6: Do you have any other comments on the proposed legal text for DCP 400?

Acceding to DCUSA to act as the CMRC

4.21 As stated above, it is proposed that Alt HAN Co accede to DCUSA to allow them to act as a CMRC to undertake the works identified in Paragraph 4.7. Alt HAN Co will only need to accede to the Clauses relevant to DCP 400 and will not need to contribute to any DCUSA related costs and will not need to become DCUSA Panel or Board members.

4.22 When acceding to DCUSA Alt HAN Co would need to provide the following information:

- Company Name
- Registration Number
- Registered Address
- Principle Operating Address
- Contract Manager (a primary contact for DCUSA related matters)
- Contract Manager Telephone Number
- Contract Manager Email Address

Raising Changes and Voting Rights

4.23 If this CP is implemented, it is not envisioned that Alt HAN Co will have the ability to raise CPs or vote on CPs. Impacted DCUSA Parties (Distributors and Energy Suppliers) can bring changes forward to DCUSA if there is a need to address any impacts to Alt HAN.

Question 7: If implemented, do you agree that with the position that Alt HAN Co should not be able to raise CPs and vote on CPs? If not, please provide your rationale.

Other Code Changes

Retail Energy Code

Provision of Information

4.24 As mentioned above, REC Modification R0043 will make the necessary amendments to ensure that the CMRC is set up as a new Role Code, and for the relevant Market Messages to include new Scenario Variants where the CMRC will send and receive information between the Registered Supplier and/or the DNO/IDNO.

4.25 For the purposes of any pilot activity the CMRC will utilise other means of communication that do not rely on the R0043 changes.

4.26 In the event that legal advice determines that Alt HAN Co needs to also accede to the REC then this will be progressed as a separate change

Question 8: Do you agree with the other codes changes?

Question 9: Have you identified any other changes?

5 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. DCP 400 will be measured against the DCUSA General Objectives, which are set out in the table below:

	DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
<input checked="" type="checkbox"/>	2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	Positive
<input checked="" type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Neutral
<input type="checkbox"/>	5. Compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

- 5.2 The proposer believes that DCUSA General Objective 1 and 2 will be better facilitated by the implementation of this change as there will be increased efficiencies gained by using a co-ordinated approach to overcome the current situation whereby smart meter installs to premises that have crowded/ shared meter rooms aren't able to proceed without the intervention of multiple parties.
- 5.3 This change will enable Alt HAN, acting as a Crowded Meter Room Coordinator (CMRC), to be permitted by DCUSA parties to commission works to resolve CMRs. This will alleviate some of the issues that are currently faced by industry as well as customers who have been unable to secure their smart meter installs due to the current lack of a co-ordinated approach. These delays result in jobs being aborted, and in some cases, customers cancelling jobs which inhibits progress towards net zero and the ability of Suppliers to offer new innovative tariffs.

Question 10: Do you consider that the proposal better facilitates the DCUSA General Objectives?

If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.

If not, please provide supporting reasons.

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 N/A

Does this Change Proposal Impact Other Codes?

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
SEC	<input type="checkbox"/>
REC	<input checked="" type="checkbox"/>
None	<input type="checkbox"/>

Consideration of Wider Industry Impacts

- 6.2 The issue of Crowded Meter Rooms, or more specifically, the concerns about the lack of a collaborative approach to the considered evolution of Meter Room engineering, has existed for many years, if not decades. Possible solutions have been discussed at industry forums including BEIS' Smart Metering Operations Group (SMOG) and trade associations.
- 6.3 This Change Proposal is built on considerable analysis undertaken by Alt HAN Co. Ltd. to identify potential solutions to the challenge of Crowded Meter Rooms. Establishing an Industry Coordinator to undertake the aforementioned works was identified through industry consultations as the most efficient and effective solution of a series of viable resolving options.
- 6.4 In some instances, by resolving Crowded Meter Rooms to facilitate the installation of Alt HAN devices, the installation of SMETS2 meters more generally would also be facilitated. This is because the works would apply to Crowded Meter Rooms in buildings where some, but not all, impacted premises may require Alt HAN solutions while others would not.
- 6.5 Data sharing between the Crowded Meter Room Co-ordinator and Network Operators over building network owners and/or landlords information should assist in the speedy resolution of issues with access to buildings and future works.

Question 11: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Confidentiality

6.6 This Change is not confidential.

7 Implementation

7.1 It is proposed that this CP should be implemented 10 Working Days after Authority approval.

Question 12: Do you agree with the Working Group's proposed implementation date? Please provide your rationale.

8 Legal Text

8.1 The proposed DCP 400 Legal Text can be found in Attachment 3. Any comments on the proposed legal text can be provided in response to question 6 of this consultation.

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 understand the intent of DCP 400?
2	Are you supportive of the principles of DCP 400?
3	Do you agree that the permitted works for a CMRC detailed in Paragraph 4.7 may be reasonably required to maximise the available space within a meter room or meter cupboard, in order to enable the installation of Relevant Alt HAN Equipment and Smart Metering equipment? Please provide your rationale
4	Do you have any comments on the proposed provision of information Clauses set out in Section 2H of the legal text?
5	Do you agree that the liability clause within Section 2H should follow the same principle as existing DCUSA agreements between DNO, IDNO and Electricity Supplier Parties? If not, Provide your rationale.

6	Do you have any other comments on the proposed legal text for DCP 400?
7	If implemented, do you agree that with the position that Alt HAN Co should not be able to raise CPs and vote on CPs? If not, please provide your rationale.
8	Do you agree with the other codes changes?
9	Have you identified any other changes?
10	Do you consider that the proposal better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons.
11	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
12	Do you agree with the Working Group's proposed implementation date? Please provide your rationale.

10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **26 July 2022**.

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 400 Consultation Response Form
- Attachment 2: DCP 400 Background & Comparisons to DCP 394
- Attachment 3: DCP 400 Draft Legal Text
- Attachment 4: DCP 400 Change Proposal Form