




DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 417:</h2> <h3>Ability for the DCUSA Secretariat to Raise Change Proposals</h3> <p><i>Date raised: 16 November 2022</i></p> <p><i>Proposer Name: Simon Yeo</i></p> <p><i>Company Name: National Grid Electricity Distribution</i></p> <p><i>Company Category: DNO</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of Change Proposal (CP): <p>This change seeks to grant the ability to the Secretariat to raise Change Proposals where it identifies a change that would better facilitate the DCUSA Objectives and to introduce an obligation for the Secretariat to raise Change Proposals in certain circumstances, such as at the direction of the Authority.</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 417 ‘Secretariat to Raise Change Proposals’.</p> <p>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 31 October 2023.</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:</p> <p>Suppliers / DNOs / IDNOs / CVA Registrants / Gas Suppliers / OTSO Party</p>	
	<p>Impacted Clauses:</p> <p>Amendments to Section 1C – Clause 9.4.6, Clause 10.2, Clause 10.11 and new Clauses (10.2A, 10.2B and 10.2C, as currently drafted in this Proposal.)</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	21 December 2022
Consultation Issued to Industry Participants	05 May 2023
Second consultation Issued to Industry Participants	13 October 2023
Change Report Approved by Panel	20 December 2023
Change Report issued for Voting	21 December 2023
Party Voting Closes	16 January 2024
Change Declaration Issued to the Authority	18 January 2024
Authority Decision	TBC
Implementation	Next DCUSA release following Authority approval

1 Summary

What?

- 1.1 DCP 417 'Ability for the DCUSA Secretariat to Raise Change Proposals' was originally raised on 16 November 2022. The Working Group issued an initial consultation on 05 May 2023, see Attachment 2 for the full consultation documentation, along with industry responses and Working Group feedback. Following review of the consultation responses, the Working Group has revised the original solution. This second DCP 417 consultation details these changes and seeks industry views.

Why?

- 1.2 In the original CP (see Attachment 4), the proposer believed the Secretariat could deliver additional value in its role as Code Administrator of the DCUSA by using the skills and knowledge of its employees to identify opportunities for changes that better facilitate the DCUSA Objectives and raising Change Proposals itself to progress these changes, rather than expending time and resources trying to find a sponsor with the capacity to take sponsorship of an issue. It was also believed the Secretariat could progress changes where other priorities have prevented sponsors from taking on and progressing certain changes. For example, Change Proposals that have stalled due to other priority changes, such as during changes resulting from a Significant Code Review.
- 1.3 Further to the above, the Working Group identified additional benefits such as the Secretariat could raise Change Proposals as directed by the Authority, raise housekeeping changes and changes that arise as a consequence of other code modifications.

How?

- 1.4 In the first consultation, it was proposed that the Secretariat should be able to raise CPs utilising the existing DCUSA governance that DCUSA Parties follow (albeit the Secretariat would not be a DCUSA Party). Respondents from the first consultation raised concerns that the Secretariat could raise changes that benefits itself and particular concerns were raised in regard to lack of industry input prior to a change being approved to progress to Working Group or Change Report. Some respondents stated that they would be supportive of a reduced scope such as the ability for Secretariat to raise housekeeping changes and Authority lead changes only. In relation to the reduced scope, the Proposer felt that this would take away most of the benefits identified within the first consultation and an alternative solution was provided whereby it was felt that the benefits identified would be maintained and also the risks identified above mitigated.
- 1.5 Following review of the consultation responses, the Proposer, with input from the Working Group, has revised the proposed solution. There are two existing DCUSA forums – the Standing Issues Group (SIG) and the Distribution Charging Methodologies Development Group (DCMDG) – which are held monthly. The suggested amendment is that where the Secretariat identifies an area of DCUSA that it believes would benefit from a change, this is initially raised at one of these forums by completing an issues form. This will then be reviewed at the relevant group and next steps will be determined by the members. It may be that following discussions, an industry member wishes to take on the change and a Change Proposal (CP) is submitted through an existing DCUSA Party. Alternatively, the group could instruct the Secretariat to take the lead on raising the CP, or it could be decided that the issue is not progressed any further at that stage. This would all be formally recorded in the minutes and published on the DCUSA website.

2 Governance

Justification for Part 1 Matter

- 2.1 This proposal seeks to grant the ability to the Secretariat to raise Issues at either the SIG or DCMDG that may subsequently lead to Change Proposals, which is a change to the change control arrangements for the DCUSA. As per DCUSA Schedule 9 Paragraph 9.4.5, “it concerns the governance or the change control arrangements applying to this Agreement”, this would be categorised as a Part 1 Matter, requiring a decision by the Authority.

Requested Next Steps

- 2.2 Following a review of the first consultation responses, the Working Group has revised the proposed solution and is therefore issuing this second consultation to seek industry views.

3 Why Change?

Background of DCP 417

- 3.1 Further to the above, the proposer believes that by granting the DCUSA Secretariat the ability to raise issues at either the SIG or the DCMDG, that may subsequently lead to CPs being raised, the Secretariat will add additional value in its role as Code Administrator of the DCUSA by utilising the skills and knowledge it has developed to help drive improvements that better facilitate the DCUSA Objectives.

4 First DCP 417 Consultation

DCP 417 Consultation

- 4.1 The DCP 417 consultation was issued on 05 May 2023 and there were 8 responses received. These consisted of three Suppliers, three DNOs, one IDNO and one generator.
- 4.2 A summary of the responses received, and the Working Group’s conclusions are set out below. The full set of responses and the Working Group’s comments are provided in Attachment 2.

Question 1 - Do you understand the intent of the CP?

- 4.3 All responders confirmed that they understood the intent of DCP 417.

Question 2 – Are you supportive of the principles of DCP 417?

- 4.4 In regard to support for this CP, it was an even split – four respondents support the CP, whilst the other four respondents did not. Key themes amongst those respondents that were not supportive are below, a majority of these were identified in the previous consultation and a majority of the Working Group believed they were mitigated against, however as stated above following review of the consultation responses propose a new solution which is detailed further in Section 5 of this consultation.

- Insufficient industry engagement prior to a Secretariat lead CP being raised.
- Secretariat would have the ability to raise Change Proposals and effectively be able to “mark its own homework”.

- The Secretariat could raise Change Proposals to change or enhance its own abilities;
- The Secretariat could raise Change Proposals for subjects where it lacks the expertise to do so;
- The Secretariat could raise a large number of Change Proposals, resulting in resource and prioritisation issues for itself, the Panel and industry as a whole.
- Current proposed governance gives the Panel limited powers to reject a Secretariat CP.

Question 3 – Do you agree with the list of potential benefits?

- 4.5 Four respondents agreed with the list of benefits outlined in the consultation. The four respondents not supportive reiterated some of the concerns above and some noted that a more narrowed scope may be appropriate, for example, limited to housekeeping changes, Authority lead and consequential changes.

Question 4 – Do you consider that there are other benefits of allowing the DCUSA Secretariat to raise Change Proposals?

- 4.6 No respondents identified any additional benefits at this stage.

Question 5 – Can you think of any other risks of allowing the DCUSA Secretariat to raise Change Proposals?

- 4.7 There were mixed reviews as to whether respondents believe there are any additional risks of allowing the DCUSA Secretariat to raise CPs. One response stated that this may not be the best time in relation to the Ofgem Energy Code Reform. A concern regarding lack of industry input was also reiterated.

Question 6 - Do you consider that the risks identified are mitigated by the existing DCUSA legal text, as per the analysis above? If not, please provide your rationale and suggest additional mitigations you believe are necessary.

- 4.8 There were mixed reviews as to whether respondents consider that the risks identified are mitigated by the existing DCUSA legal text. Those not supportive of the original proposal did not believe the legal text mitigated against all the concerns. One respondent mentioned mandatory ex ante industry scrutiny via the DCMDG, and other channels could be added as part of the oversight process, and this has been considered in the new proposed solution.

Question 7 - Are there any other mitigations in the existing DCUSA legal text that the Working Group should consider?

- 4.9 Respondents did not identify any other mitigations in the existing DCUSA legal text.

Question 8 - Do you believe any additional risks you identified in your answer to question 5 are mitigated by the existing DCUSA legal text? If not, please explain if you believe any additional mitigations are required.

- 4.10 Most respondents responded with no or not applicable. One respondent reiterated that the Energy Code Reform is currently an unknown and one respondent referred to a previous

response where they mentioned additional Panel powers or industry engagement through DCMDG and other industry groups.

Question 9 - Do you consider that the Panel should have the ability to defer or reject the progression of a Change Proposal raised by the Secretariat if it is expected to cause costs over and above the annual allocation for all DCUSA Change Proposals, unless the benefits outweigh these additional costs?

- 4.11 A majority of the respondents agreed that the Panel should have the appropriate additional powers to defer or reject the progression of a CP raised by the Secretariat.
- 4.12 As stated above, the Working Group developed an alternative solution following the review of the consultation responses. This new approach would ensure that the Secretariat would only be able to raise CPs at the direction of DCUSA Parties via the SIG or DCMDG. It is believed that this additional industry engagement, prior to a CP being raised, results in additional Panel powers not being required.

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.

- 4.13 There were mixed views as to whether the CP better facilitates the DCUSA General Objectives. The four supportive believe DCUSA General Objective Four is better facilitated. The four that were not supportive of the current proposal believe it is neutral at best.

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

- 4.14 Three respondents noted that Ofgem and DESNEZ are currently engaging in a review of Energy Code Reform.

Question 12 - Do you have any comments on the proposed legal text?

- 4.15 Seven respondents had no comments on the proposed legal text. One respondent suggested that the Panel have additional powers to be able to defer/reject CPs when initially assessing them. It was also suggested that additional wording is added to state that Working Group members can collectively determine whether a CP should be withdrawn from the process prior to wider Consultation, if this is to be included within the solution, although they were not supportive of this.

Question 13 - Do you have any other comments on DCP 417?

- 4.16 Five respondents did not have any additional comments on this CP, and three respondents provided additional comments. One respondent mentioned that SEC had previously raised a similar CP and it was rejected. One respondent asked has there been many issues seen in relation to sponsors being found for CPs. One respondent reiterated that they believe the solution should be limited to housekeeping changes, changes directed by Authority and cross code consequential changes.

5 Further DCP 417 Working Group Assessment

- 5.1 This DCP 417 Working Group consists of Supplier, DNO, IDNO and Generator representatives. There was also an Ofgem observer present on the Working group. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 5.2 In the previous consultation the Working Group considered the potential risks of granting the new powers. This was partly because SECAS, the code administrator for the Smart Energy Code, had twice tried to request additional powers as code administrator to enable it to raise change proposals itself, with each proposal being rejected by Ofgem. The Working Group noted the rejection reasons for each proposal, SECMP881 and SECMP1492 and carried out an analysis against each of these. In addition, the Working Group discussed additional risks not noted in the Ofgem rejections of the SECAS change proposals. The issues and risks identified between the rejections of the SECAS change proposals and the Working Group's analysis can be found in the first consultation (Attachment 2).
- 5.3 After consideration of the consultation responses, the Working Group identified the following areas that needed further consideration:
- insufficient industry engagement prior to a Secretariat lead CP being raised;
 - the Secretariat would have the ability to raise Change Proposals and effectively be able to “mark its own homework”;
 - the Secretariat could raise Change Proposals to change or enhance its own abilities;
 - the Secretariat could raise Change Proposals for subjects where it lacks the expertise to do so;
 - the Secretariat could raise a large number of Change Proposals, resulting in resource and prioritisation issues for itself, the Panel and industry as a whole; and
 - the current proposed governance gives the Panel limited powers to reject a Secretariat raised CP.

Proposed New Solution

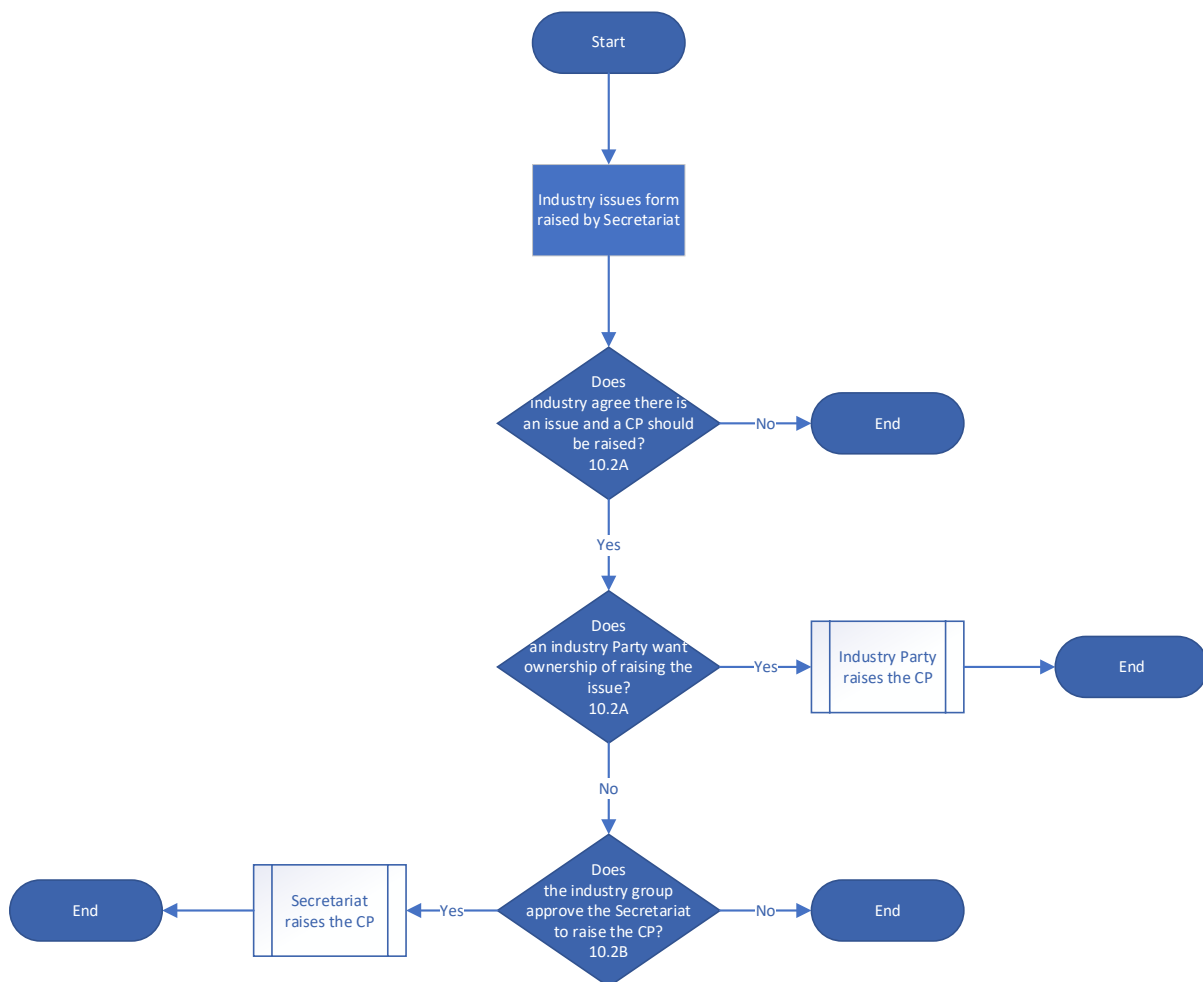
- 5.4 Following review of the consultation responses, the Proposer, with input from the DCP 417 Working Group, has revised the proposed solution. There are two existing DCUSA forums – the Standing Issues Group (SIG) and the Distribution Charging Methodologies Development Group (DCMDG) – which are held monthly. The suggested amendment is that where the Secretariat identifies an area of DCUSA that it believes would benefit from a change, this is initially raised at one of these forums by completing an issues form. If the issue is in relation to charging the DCMDG issues form should be completed (see Attachment 5) and if the issue is related to any other aspect of DCUSA the SIG issue form should be completed (see Attachment 6). These issue forms will be submitted to the respective group no later than five working days prior to the meeting.
- 5.5 These issue forms will then be reviewed at the relevant group and next steps will be determined by the members. It may be that following discussions, an industry member wishes to take on the change and a CP is submitted through an existing DCUSA Party. Alternatively, the group can instruct that the Secretariat takes the lead on raising the CP or that the issue is not progressed

any further at that stage. This will all be recorded formally in the minutes and published on the DCUSA website.

- 5.6 A quorum would need to be present at SIG or DCMDG in order for a decision to be made to instruct the Secretariat to raise a CP. There are existing quorum rules within the DCUSA document in relation to the DCUSA Panel as below:

“No business shall be transacted at any meeting of the Panel unless a quorum is present at that meeting. The quorum for each Panel meeting shall be four Panel Members, at least one of whom must have been elected by the DNO Parties and at least one of whom must have been elected by the Supplier Parties”.

- 5.7 It is proposed that the SIG and DCMDG follow a similar process requiring a minimum of four DCUSA Parties being present at the meeting, with at least one being a DNO Party and one being a Supplier Party. Decisions will be made on a majority vote.
- 5.8 The following diagram shows how the process would work:



- 5.9 As illustrated by the above process diagram, the Secretariat would raise an issues form at the SIG or DCMDG:

- where industry does not agree that an issue exists and that a CP form should be raised, the process is terminated;
- where industry agrees that an issue exists and that a CP form should be raised, a volunteer from an industry Party will be requested to take ownership of the issue and for raising a Change Proposal;

- where no such volunteer steps forward, the Secretariat will request the group's approval to raise the CP on behalf of industry; and
- where approval is granted by the group, and there is a quorum, the Secretariat will raise the Change Proposal; or
- where approval is not granted by the group, the issue would be logged, and the process is terminated.

5.10 In establishing a process that embeds industry engagement and ownership as a core part of the Secretariat's role in identifying issues and raising Change proposals, the Proposer believes that the risks and issues identified by the Working Group and consultation respondents are fully mitigated, whilst still realising the overall benefits of the proposal.

5.11 As noted above, some respondents stated that they would be supportive of a reduced scope such as the ability for Secretariat to raise housekeeping changes and Authority lead changes only. This approach was also supported by some Working Group members. After consideration, the Proposer and other Working Group members felt that this would take away most of the benefits identified within the first consultation and therefore this alternative solution is being presented.

Review of risks against solution and mitigations

5.12 The Working Group analysis of the risks identified in paragraph 5.3 above can be found in the following table:

Issue	Mitigated	Mitigation
Insufficient industry engagement prior to a Secretariat lead CP being raised.	Yes	Industry fully engaged in the discussion and decision around the creation of a CP, with the final decision on the creation of a CP being made by an industry forum (SIG/DCMDG).
The Secretariat would have the ability to raise Change Proposals and effectively be able to "mark its own homework."	Yes	Industry fully engaged in the discussion and decision around the creation of a CP, with the final decision on the creation of a CP being made by an industry forum (SIG/DCMDG), and <u>not the Secretariat</u> .
The Secretariat could raise Change Proposals to change or enhance its own abilities.	Yes	In requiring the Secretariat to gain the support and approval of industry forums (SIG/DCMDG) to raise CPs, it is extremely unlikely either industry forum would endorse the creation of a CP that changes or enhances the Secretariat's abilities.
The Secretariat could raise Change Proposals for subjects where it lacks the expertise to do so.	Yes	All CPs raised by the Secretariat would have been discussed by industry experts at industry forums (SIG/DCDMG). Where those experts felt a Party would be better placed to raise a CP due to expertise requirements, this would be the outcome the forum would arrive at.

The Secretariat could raise a large number of Change Proposals, resulting in resource and prioritisation issues for itself, the Panel and industry as a whole.	Yes	The Secretariat would only raise CPs after full engagement with industry (at the SIG/DCMDG) and industry would have agreed that a CP needed to be raised.
Current proposed governance gives the Panel limited powers to reject a Secretariat raised CP.	Yes	The existing Panel powers to reject a CP would be sufficient, as any CPs raised by the Secretariat would have already been approved by industry (at the SIG/DCMDG), and therefore the Panel should not need to have powers to veto this, as the CPs would represent an industry view.

Question 1: Do you consider that the above process mitigates the risks and issues identified by the Working Group and by the respondents to the previous consultation?

Question 2: Do you believe there are any risks that are not mitigated by the above process? Please provide your rationale.

Question 3: Can you think of any other risks and issues that the Working Group should consider? Please provide your rationale.

Case for Change

5.13 Some respondents to the first consultation stated that they did not consider that a sufficient case for change has been made. Below are some recent examples of where it is believed that an implemented DCP 417 would have been of benefit to industry:

1. At the June SIG meeting, there was discussion between parties in relation to the submission of Rota Load Block Alpha Identifier data. It was established that issuing the data at a later date than currently stipulated would be of benefit as the data would be more accurate. At that stage the requirement for a CP was identified, along with the need for a proposer. This CP needed to be raised urgently if it was going to avoid the potential need of a derogation. At this stage a CP has not been raised. This is one example of where SIG members could have instructed the Secretariat to raise a CP on its behalf to push through the change as quickly as possible.
2. There are times when Ofgem may make requests in their decision letters. For example, within their decision for DCP 386 'Sharing Network Information with Owners and Occupiers' whilst they approved the implementation of the CP, they requested additional clarity in relation to the term 'constraints'. In these types of scenarios, the Secretariat could take the lead on the change.
3. DCP 408 'Energy Bills Support Scheme (EBSS) cost-recovery treatment' was raised as a result of government policy. Whilst this CP was subsequently withdrawn due to a change of approach, this is an example of where DEZNS could have interacted directly with the Secretariat to initiate the change process.

5.14 Whilst the above provides some recent examples of where an implemented DCP 417 could have helped, the main purpose of this CP is to bring extra scope for the Secretariat to provide value to industry moving forward. This could come from them identifying an issue through their various

engagement with industry such as attendance at working groups or their attendance at the Cross Code Steering Group or the Code Administrators Code of Practice. Prior engagement with industry will always be at the heart of any Secretariat lead change.

- 5.15 It is believed that an implemented DCP 417 will provide more scope to the Authority who could instruct the Secretariat to investigate certain issues with industry that they may be aware of or instruct the Secretariat to raise CPs for Significant Code Reviews. In a fast-changing industry allowing the Secretariat to have more involvement in the developing of change proposals can add valuable extra resource to industry, whilst still ensuring tight governance.
- 5.16 Other benefits would include the ability for the Secretariat to raise identified housekeeping changes without the need for a Party to be involved, albeit at the instruction of industry via SIG or DCMDG.
- 5.17 One respondent raised a concern that, if implemented, DCP 417 could provide the DCUSA Secretariat an unfair competitive advantage with Ofgem's Energy Code Reform. It should be noted that any Party acceding to any of the other codes could raise a modification similar in nature.

6 Assessment Against the DCUSA Objectives

- 6.1 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 417 will be measured against the DCUSA General Objectives, which are set out in the table below:

	DCUSA General Objectives	Identified impact
<input type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Neutral
<input 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	Neutral
<input type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Neutral
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<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.	Neutral

- 6.2 Some Working Group members consider that granting the Secretariat the ability to raise Change Proposals will result in benefits to DCUSA General Objective 4, 'The promotion of efficiency in the implementation and administration of the DCUSA'.
- 6.3 Allowing the DCUSA Secretariat to raise issues at the SIG or DCMDG for industry review will allow the Secretariat to utilise existing industry forums to facilitate industry discussion where it believes it has identified a change that will better facilitate the DCUSA Objectives.
- 6.4 The following options will be available to industry at these meeting:

- A DCUSA Party takes ownership of the CP;
- the SIG or DCMDG, through a majority vote, instruct the Secretariat to raise the CP; or
- the issue is withdrawn, resulting in no CP being raised.

6.5 The above options allows for extra flexibility, which in turn will aid in the promotion of efficiency in the implementation and administration of the DCUSA.

Question 4: 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.

7 Impacts & Other Considerations

Significant Code Review (SCR) or other significant industry change projects

7.1 No impacts have been identified.

Cross Code Impacts

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

Consideration of Wider Industry Impacts

7.2 It is noted that the DEZNS and Ofgem Energy Code Reform is also considering code governance in general.

8 Implementation

8.1 It is proposed that should this CP be approved, it is implemented in the next scheduled DCUSA release following any such approval.

9 Legal Text

Legal Text

9.1 Please find the proposed, red-lined legal text in Attachment 3 to this CP.

Text Commentary

9.2 The following clauses have been suggested to be either added or modified:

- clauses 9.4.6, 10.2.4 and 10.2.5 have been modified to reflect the ability for the Secretariat to raise Change Proposals;

- clause 10.2.6 has been added to reflect the ability for the Secretariat to raise Change Proposals, with the approval of the SIG or DCMDG;
- clause 10.2A has been added to require the Secretariat to raise issues at the SIG or DCMDG and to provide an opportunity for industry to take ownership of the issue and responsibility for raising the Change Proposal;
- clause 10.2B has been added to require approval, by simple majority, of the SIG or DCMDG before the Secretariat can raise a CP form, and to require a quorum at each group, similar to existing quoracy requirements for the DCUSA Panel and Board.

Question 5: Do you have any comments on the proposed legal text?

Question 6: Do you have any other comments on DCP 417?

10 Code Specific Matters

Reference Documents

10.1 Not applicable.

11 Consultation Questions

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

No.	Questions
1	Do you consider that the above process mitigates the risks and issues identified by the Working Group and by the respondents to the previous consultation?
2	Do you believe there are any risks that are not mitigated by the above process? Please provide your rationale.
3	Can you think of any other risks and issues that the Working Group should consider? Please provide your rationale.
4	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.
5	Do you have any comments on the proposed legal text?
6	Do you have any other comments on DCP 417?

11.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **31 October 2023**.

11.3 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.

12 Attachments

- Attachment 1: DCP 417 Consultation Response Form
- Attachment 2: DCP 417 Consultation and Industry Responses
- Attachment 3: DCP 417 Draft Legal Text
- Attachment 4: DCP 417 Change Proposal Form
- Attachment 5: DCMDG Issues Form
- Attachment 6: SIG Issues Form