



COLLABORATION ON PHOSPHORUS REDUCTION SCHEMES GUIDANCE DOCUMENT

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CONTENTS

CONTEXT	3
PURPOSE OF THIS GUIDANCE DOCUMENT	3
AUDIENCE FOR THIS GUIDANCE DOCUMENT	3
CONSTRUCTED TREATMENT WETLANDS	3
WWTW COLLABORATION CATEGORIES	4
THE SCREENING PROCESS	4
CATEGORIES EXPLAINED	4
CATEGORY A WWTWS	4
CATEGORY B WWTWS	4
CATEGORY C WWTWS	5
CATEGORY D WWTWS	5
ROLES AND RESPONSIBILITIES FOR PHASE 1	7
NUTRIENT MANAGEMENT BOARDS	7
DŴR CYMRU WELSH WATER	7
THIRD PARTY ORGANISATION	7
NATURAL RESOURCES WALES AND ENVIRONMENTAL AGENCY	7
FUNDING ARRANGEMENTS	8
WHAT HAPPENS NEXT?	8
LINKED DOCUMENTS & RESOURCES	9
RELEVANT LEGISLATION	9
APPENDIX	10
APPENDIX 1: MEMORANDUM OF UNDERSTANDING FOR PHASE 1	10
APPENDIX 2A: PHASE 1 PROCESS	10
APPENDIX 2B: DIAGRAM OF WHOLE PROCESS	11
APPENDIX 3: COLLABORATION PROFORMA	12
APPENDIX 4: FUNDING CONTRIBUTIONS	12

CONTEXT

All Special Areas of Conservation (SACs) are protected under the Conservation of Habitats and Species Regulations 2017, as amended (the Habitats Regulations).¹

In January 2021 Natural Resources Wales (NRW) introduced new phosphate standards for the riverine SACs in Wales. These targets are 50-80% tighter than previous limits. A compliance assessment, conducted by NRW, against the standards found failure to meet the targets in the Dee, Cleddau, Wye, Teifi and most significantly the Usk.

High phosphate levels in surface water, leads to eutrophication of our rivers. Eutrophication adversely affects the quality of the water and ecology. The problem is complex with many contributing factors, one stretch of a given catchment is different to another stretch of river in another catchment – and the solutions are equally complex and multi-faceted. Focusing on one sector, or one site with more stringent targets, could, at best result in an inefficient use of investment and at worst bring no significant benefit to our rivers or the habitats that depend on them.

We are fully committed to working in partnership with others to maximise opportunities for river quality improvement, by managing land and water in an integrated way. This includes supporting Nutrient Management Boards and catchment partners to co-deliver solutions, to address multiple and competing needs in Wales's failing SACs.

Following 'Source Apportionment' modelling to identify the main phosphate sources on each section of the five failing SAC rivers, we have produced our indicative Phosphorus Programme, detailing wastewater treatment works likely to require a new phosphorus permit condition, to address DCWW's compliance needs. Therefore, DCWW is now in a position to work with catchment partners, to jointly progress, or enable, feasibility studies of constructed treatment wetlands (CTW) for additional phosphorous load reduction. We have pre-screened our WwTW; each WwTW has been allocated a 'collaboration category', based on the existing permit conditions and future planned investment.

The collaboration opportunities discussed in this pack, focus solely on constructed treatment wetlands, for nutrient reduction, fed by our final effluent. For information on wider collaborative opportunities, please see our Drainage and Wastewater Management pages on our website.

Importantly, these collaboration opportunities are being shared with NMB partners, ahead of the NRW led Review of Permit (RoP) exercise. Therefore, the categories are subject to change. But the upfront screening aims to provide a starting point for focused and well directed CTW feasibility studies.

PURPOSE OF THIS GUIDANCE DOCUMENT

This guidance pack provides details on collaboration opportunities available at our WwTW for further phosphorus removal. This document explains the screening process we have undertaken, introduces the WwTW categories; then presents the next stage of collaboration, specific to each WwTW category.

AUDIENCE FOR THIS GUIDANCE DOCUMENT

This pack is aimed at NMBs and all organisations that garner NMB support, to undertake feasibility assessment/s of constructed treatment wetland/s (CTW), at which will be fed by DCWW final treated effluent.

CONSTRUCTED TREATMENT WETLANDS

Constructed Treatment Wetlands (CTW) work by taking partially treated effluent and passing it through a series of interconnected ponds planted with native wetland species such as iris, sedges, rush, marsh marigold and watercress. CTWs are engineered to mimic the physical, chemical, and biological processes occurring in natural wetlands.

The wetland plants 'clean' the effluent through a process of bio-accumulation, helping reduce phosphate, and other substances. DCWW's existing water treatment processes already removes the majority of these substances in line with our environmental permits issued by Natural Resources Wales and the Environment Agency. But wetlands provide further 'tertiary treatment'. Due to their modular nature, generally made up of a series of interconnecting cells, they are a good option for collaborative solutions, where multiple partners require a reportable benefit.

Not only do the wetlands have a practical water quality benefit, but they provide a huge biodiversity asset and create a valuable habitat for local wildlife.

The CTW that this document and supporting processes relates to, will be fed by final effluent flows from a DCWW WwTW and are funded and owned entirely, or partly by a third party.

1. As opposed to a WwTW that requires a TP limit, but the site is already meeting the new permit limit or will do so by the regulatory deadline.

WWTW COLLABORATION CATEGORIES

We are providing a list of our WwTW, for the benefit of each catchment's SAC compliance and nutrient neutrality needs. We have done this by highlighting where further phosphorus reduction is possible.

THE SCREENING PROCESS

To accelerate the collaboration process, we have pre-screened our WwTW. Each WwTW has been allocated a 'collaboration category' (A, B, C or D). Each of the categories has a varying scale of potential collaboration, based on:

1. The current permit limits and parameters
2. Our indicative Phosphorus Programme over the next 2 AMPs (therefore the new permit limits)
3. The likelihood of investment required to meet those limits (depending on if the WwTW is already treating to the new limit)
4. The dynamics of the WwTW (for example the population equivalent the WwTW serves, if the WwTW receives any trade effluent, current treatment level).

The above has been based on desk-based data analysis and screening principles that have been generated by our academic partners, and industry accepted knowledge of wetlands performance and scalability. The categorisations are informed by our current sample programme, our understanding of the sites' current treatment performance and current legislation and policy guidance. Should any of the above change – for example if policy guidance is updated – prior, during or after feasibility has been conducted, this will impact upon DCWW's investment programme, and therefore the category of the WwTW will also change, as will the nature of the collaboration. The categories are also subject to change, pending NRW's RoP.

CATEGORIES EXPLAINED

The categories are further summarised in table 1 below and supported by basic diagrams, to further help contextualise. This section provides a short narrative for each category.

CATEGORY A WWTWS

Category A WwTW: Qualifying criteria

- DCWW has an existing Total Phosphorus limit of $\leq 4\text{mg/l}$
- DCWW will have a Total Phosphorus limit of $\leq 4\text{mg/l}$ in future AMPs
- The current or future flows expect to increase the population equivalent the treatment WwTW serves over the suitable flows for a wetland to accommodate
- The WwTW receives trade effluent that contains certain substances that is likely to harm a wetlands habitat, or make the normal treatment process a wetland can provide, inefficient.

Category A WwTW: Impact on Collaboration

- No further Total Phosphorus via CTW is possible
- No collaboration opportunities are available at this site for further TP reduction
- No Proformas or collaboration requests can be processed for these WwTW

CATEGORY B WWTWS

Category B1 WwTW: Qualifying criteria

- DCWW has an existing Total Phosphorus limit $> 4.1\text{mg/l}$
- DCWW will have a Total Phosphorus limit of $> 4.1\text{mg}$ in future AMPs
- DCWW's future AMP Total Phosphorus limit will require investment²

Category B1 WwTW: Impact on Collaboration

- There is potential for further Total Phosphorus reduction
- Collaboration opportunity is available at these WwTW
- This collaboration may involve a jointly owned CTW (different cells owned by different organisations but part of the same interconnected wetlands)
- Both parties garner a reportable TP reduction from the CTW
- Category B WwTW are subject to change. The categorisation is based on current sample data. Sites may transition to a category D site, as our understanding of the site's performance increases during route course analysis.
- The impact of this change in category (from B to D) will mean the wetlands transitions from being a jointly owned and funded CTW, to a 3rd party solely owned and funded CTW.

2. As opposed to a WwTW that requires a TP limit, but the site is already meeting the new permit limit or will do so by the regulatory deadline.

Category B2 WwTW: Qualifying criteria

- DCWW has a future AMP water quality investment need (within certain limits), that is non- Phosphorus related³
- DCWW's future AMP driver, has the potential to be addressed by a CTW (based on known flows and WwTW dynamics among additional variables)

Category B2 WwTW: Impact on Collaboration

- CTW is anticipated to form part of/all the solution required to address DCWW's water quality driver
- CTW solution could also be designed to reduce Total Phosphorus
- There is a need for a multi-scope feasibility to be agreed in the inception meeting to understand if the CTW can address both organisation's needs
- This collaboration may involve a jointly owned CTW (different cells owned by different organisations, with clear compliance demarcation, but part of the same interconnected wetlands)
- DCWW garners it's required water quality parameter reduction, partner organisation garners TP reduction from the same CTW

CATEGORY C WWTWS**Category C WwTW: Qualifying criteria**

- DCWW has AMP8 driver that is non- Phosphorus related
- DCWW expects to have a conventional solution to address the water quality improvement (determined by the % reduction required or the route course analysis).

Category C WwTW: Impact on Collaboration

- Further TP reduction is available following DCWW's future AMP investment
- Though both organisations require separate solutions
- The impact of this, and the difference between a Category C WwTW and a Category D WwTW, is that the future flow and water quality parameters are what the feasibility should be based upon. Not the current parameters.

CATEGORY D WWTWS**Category D WwTW: Qualifying criteria**

- Based on current regulation and policies, DCWW has no anticipated future investment need (now or future AMPs) due to the sites current performance, % of growth anticipated, flows and/or location of the WwTW in the catchment.

Category D WwTW: Impact on Collaboration

- Partners can progress feasibility, using current parameters, provided by the WwTW Asset Information Pack
- DCWW supports with effluent transfer only, full TP reduction provided by the CTW is the reportable benefit of the third party.

3. For example, ammonia reduction target, or another water quality parameter

CATEGORY	HEADLINE EXPLANATION	DCWW BENEFIT	3RD PARTY BENEFIT	NMB ROLE	DCWW ROLE	3RD PARTY ROLE
A	DCWW WwTW has/will have P limit. No further reduction possible. No collaboration possible	100% of TP reduction for DCWW's regulatory needs	-	-	Sole scheme owner	-
B1	DCWW WwTW will have P limit, but potential for further reduction. Collaboration opportunity.	TP reduction required being met by target date	From DCWW's new FE permit limit (xmg/l) to CTW lowest reduction limit	Provide approval for the ownership, governance, and funding of the TP reduction (beyond DCWW's reduction) relative to the catchment's competing needs	Joint wetlands owner	Joint wetlands owner
B2	DCWW WwTW will have non-P driver (WQ or growth), potential for joint benefit solution. Collaboration opportunity.	Non-P driver met by target date	100% of TP reduction	Provide approval for the ownership, governance, and funding of the TP reduction (beyond DCWW's reduction) relative to the catchment's competing needs	Joint wetlands owner	Joint wetlands owner
C	DCWW has AMP8 driver (non-P related). DCWW will have 'on-site' conventional solution. But further P reduction available. Separate solutions.	Non-P driver met by target date	100% of TP reduction	Provide approval for the ownership, governance, and funding of the TP reduction (beyond DCWW's reduction) relative to the catchment's competing needs	Facilitating Partner	Sole wetlands owner
D	DCWW WwTW has no NEP investment scheduled. Collaboration opportunity.	No DCWW reduction/ driver claimed or required at this WwTW	100% of TP reduction	Provide approval for the ownership, governance, and funding of the TP reduction (beyond DCWW's reduction) relative to the catchment's competing needs	Facilitating Partner	Sole wetlands owner

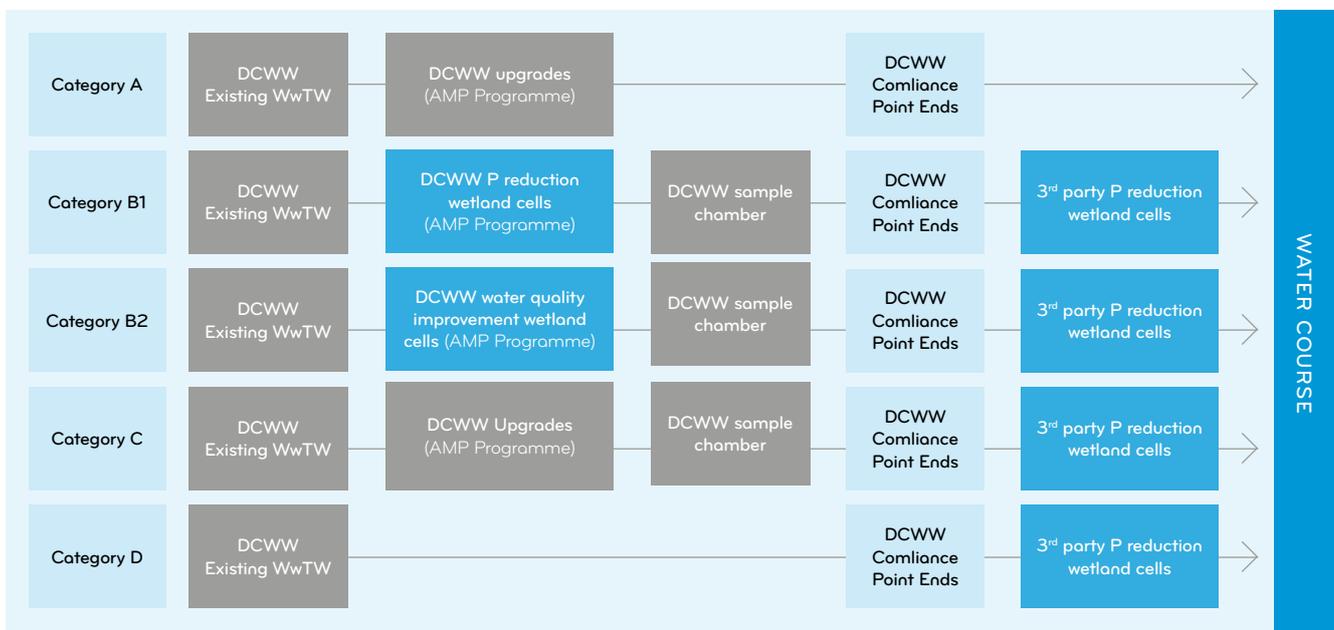


Figure 1 Diagrammatic explanation of the collaboration categories. There may be slight variations to these as we know more about the dynamics of the site and the collaboration.

ROLES AND RESPONSIBILITIES FOR PHASE 1

Collaborative working and catchment management should both be flexible and iterative. Each category of WwTW, each feasibility study, with each organisation will have nuances within the approach we take. But to enable the optimum partnership, we have presented a template Memorandum of Understanding and 'Collaboration Principles'. It is of limited value to have complex contracts at this early stage of the feasibility process, though that will be required should schemes progress to design and delivery stage. Detailed roles and responsibilities are presented in the Memorandum of Understanding, accompanying this pack. The section below provides high-level roles and responsibilities for this collaboration.

NUTRIENT MANAGEMENT BOARDS

Each catchment has complex and competing needs, for example prioritising development 'offsetting credits' or focusing on river compliance and ecological improvement; additionally, CTW are one part of the solution. Addressing each river's nutrient failures, requires independent and strategic governance and whole catchment oversight. The NMBs are best positioned to determine how phosphorus reduction is used, who benefits and how the reduction is managed and owned going forward. Therefore, our proposal is that:

- NMBs are the 1st point of call for mitigation proposals
- NMBs act as catchment mitigation approver⁴
- NMBs balance competing needs (e.g. river compliance with development offsetting)
- NMBs determine betterment commitment per solution (e.g. minimum 20% betterment to river for any credit or offsetting scheme, based on rivers' compliance exceedance)

We cannot progress your Collaboration Proforma submission, without your NMB supporting your request.

DŴR CYMRU WELSH WATER

DCWW will be responsible for pre-screening our WwTW (as discussed above) and providing relevant data to enable you to progress your feasibility. DCWW will also be responsible for adhering to the Collaboration Principles presented in the MOU. Should the CTW progress to phase 2, roles and responsibilities will be defined dependant on the category of the WwTW.

THIRD PARTY ORGANISATION

In phase 1, the third party is the organisation initiating the collaboration and request for DCWW final effluent to feed a CTW. In this instance, it is likely to be a local planning authority (LPA) or environmental NGO partner (ENGO). The third party will be responsible for leading and funding the feasibility study. They will be responsible for adhering to the Collaboration Principles presented in the MOU.

NATURAL RESOURCES WALES AND ENVIRONMENTAL AGENCY

NRW and EA are the environmental regulators for our operating area. They are responsible for advising the local planning authorities on the environmental implications of proposed development within SAC rivers, and producing policy guidance and regulation; with particular attention to water quality implications. They are also responsible for permitting the CTW should it progress to delivery stage.

4. NMB's approval will be required before a 3rd party submits a collaboration request to DCWW to utilise our final effluent for a CTW.

FUNDING ARRANGEMENTS

For phase 1, the third-party organisation who has submitted the Collaboration Proforma, will be responsible for funding the CTW feasibility stages; irrespective of the WwTW Category. This is because our Phosphorus Programme has not yet been agreed and signed off by our environmental and economic regulators. We cannot spend customer's money, until that process is complete, and all schemes are confirmed. We are sharing our indicative Phosphorus Programme ahead of this sign of stage, for the benefit of the environment and developmental needs. To enable others in the catchment to contribute to a targeted solution.

Should the scheme progress to the later phases, the costs division will be dependant upon the scheme category. These funding principles will be discussed in the Collaboration Kick Off meeting, but to enable your organisation to plan, a high-level approach is presented in appendix 5. A summary of which is below.

For all CWT schemes, there will be two distinct components. Component one is the transfer of the final effluent from its current route and discharge location to the proposed CWT's inlet. Component two comprises of the CTW itself. These can be summarised as the 'grey' and the 'green'. The 'grey' component (the Final Effluent Transfer) requires civil engineering, hydraulic assessments, and modelling. For these 'grey' components, DCWW must work with trusted framework partners due to the specific specifications of surveys and design we require and the health and safety implications of working on our sites. For that reason, DCWW will lead this 'grey' stage for all CTW.

For Category B1 and Category B2 WwTW, we will fund this these 'grey' elements. For Category C and D WwTW, the third-party will fund the 'grey' elements in their entirety, but DCWW will still lead the approach, working with our trusted partners. You will then be charged at cost for the work.

For the 'green' components (feasibility, design, sizing, and construction of the wetlands), the chosen partner/s will depend upon the category of the scheme. If it is a collaborative scheme (Category B1 or B2) then DCWW and the partnership organisation will need to agree suitable partners, based on both of our Procurement Standards and protocols. Regardless of the partner, the third-party will fund this wetlands stage in its entirety.

Both components – the 'grey' and the 'green' – come to a comparable total cost, based on experience from other schemes. Consequently, for collaborative CTW (category B1 and B2), DCWW and the third-party will contribute relatively evenly. Both organisations will operate an open book accounting approach, as defined in the MOU. More detail will be provided on this as your CTW progresses through to Kick Off Meeting.

WHAT HAPPENS NEXT?

Appendix 3 provides an overview of all phases of this collaboration, should CTW progress through to that stage. The immediate next stages to progress to phase 1 feasibility of a CTW, are:

1. Discuss your proposal with your relevant Nutrient Management Board. It is important your proposal fits into an overarching catchment response.
2. Once you have garnered NMB approval, read through the MOU.
3. If you are happy to proceed, populate the Collaboration Proforma (see link in appendix).
4. Submit the Collaboration Proforma.
5. DCWW colleagues will review your request, and based on our indicative need at the site, we will reply to your request within 4 weeks.
6. A collaboration kick-off meeting will be arranged, hosted by DCWW. In this meeting will discuss the collaboration principles, funding arrangements and additional details presented in the MOU, to confirm the working arrangements and data share process. The agenda for this meeting will be determined by the category of WwTW.
7. DCWW will then prepare an assets specific pack, containing details on the WwTW/s you are interested in to ensure an accurate, WwTW specific feasibility is undertaken.

See appendix 2a for more details on the stages that make up Phase 1 feasibility. And Appendix 2b to understand the follow-on phases, should the WwTW pass feasibility assessment.

LINKED DOCUMENTS & RESOURCES

1. NRW's Compliance Assessment Of Welsh SACs Against Phosphorus Targets
2. NRW's SAC Phosphorus Assessment Data
3. NRW's Advice to planning authorities for planning applications affecting phosphorus sensitive rivers
4. Welsh Government's Tackling Phosphorus Pollution in Special Area of Conservation (SAC) Rivers: information and evidence pack (July 2022)
5. DCWW's SAC Position Statement
6. DCWW's Improving our river water quality

RELEVANT LEGISLATION

- Conservation of Habitats and Species Regulations 2010 (The Habitats Directive).
- Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 1999 (as amended).
- Planning Policy Wales (Edition 2, July 2010)
- The European Council Urban Waste Water Treatment Directive (91/271/EEC).
- The European Council Water Framework Directive (2000/60/EC)
- Environment Act 1995
- Convention on Biological Diversity 1992
- Council Directive of the Conservation of Wild Birds 1979
- Council Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992
- Wildlife and Countryside Act 1981 (as amended)
- Environmental Protection Act 1990
- Land Drainage Act 1991
- Protection of Badgers Act 1992
- Countryside and Rights of Way Act 2000

APPENDIX

APPENDIX 1: MEMORANDUM OF UNDERSTANDING FOR PHASE 1

Welsh Water has provided a template **Memorandum of Understanding**, to cover Phase 1 of this collaboration. This will be discussed in detail in the initial collaboration kick off meeting

APPENDIX 2A: PHASE 1 PROCESS

Each phase is of course made up of multiple phases. Below provides a simplified version of the whole process, should the CTW progress through to these stages.

PHASE 1 STAGE	PURPOSE	FUNDING ORGANISATION	LEAD ORGANISATION
DCWW Phosphorous Programme shared with NMB	To communicate further opportunities for phosphorus reduction in each catchment	DCWW	DCWW
Opportunities for collaboration and mitigation reviewed at catchment scale	To ensure catchment level assessment of mitigation based on competing river needs	n/a	NMB
CTW owner and funder confirmed, NMB support garnered, Phase 1 proforma populated	To provide clear audit trail of which partner is 'owning' and funding the phosphorus reduction	n/a	CTW proposer
Phase 1 Proforma Request Processed by DCWW	To maintain governance and tracking of schemes	n/a	DCWW
Phase 1 Kick-Off meeting progressed (meeting pack and agenda shared ahead of time)	To establish feasibility parameters, feasibility specifications/standards and funding arrangements	n/a	DCWW
DCWW formalise support to progress to feasibility	To provide NMB and 3rd party assurance of DCWW (and our regulator's) support to progress to feasibility stage	n/a	DCWW
Phase 1 MOU, Funding Principles, feasibility specification and RACI signed by both parties	To ensure all parties are clear and expectations aligned with phase 1 roles and responsibilities	n/a	DCWW
Timeline, contractor and procurement strategy confirmed	To confirm both parties procurement governance and processes are adhered to, and clear runway for feasibility is in place	n/a	DCWW
WwTWs Asset specific pack produced and shared with CTW partner	To provide assets specific accuracy for the feasibility assessment/s	DCWW	DCWW
CTW contractor undertakes desk based feasibility (using DC feasibility specification where required)	To advance understanding of CTW potential at specified location	CTW proposer	CTW proposer
CTW feasibility for Complete	n/a	CTW proposer	CTW proposer
Phase 1 outcome review meeting. Decision to progress to Phase 2 or not	To ensure only high confidence CTW schemes progress to phase 2, and to amend WwTW category based on updated policy guidance and investment plans changes	n/a	DCWW & CTW proposer
End of Phase 1			

APPENDIX 2B: DIAGRAM OF WHOLE PROCESS

PHASE 0

WwTW Screening & Categorisation

No commitment is provided at the end of Phase 0.



PHASE 1

Desk-based Feasibility

No commitment is provided at the end of Phase 1.



PHASE 2

Site Feasibility

No commitment is provided at the end of Phase 2.



PHASE 3

Outline Design

DCWW support the scheme in principle and in principle will enable connection of DCWW FE to the third-party CTW. Progression from 'in principle' to full support, is dependent upon the detailed design, regulatory confirmation, legal and estates/land agreement (phase 4).



PHASE 4

Detailed Design & Permitting

DCWW's support in principle will progress to providing effluent for the use of third-party CTW or decline to support based on design risk or changes in our permitted need. If approved, design standards, costings, permitting and Estates matters have been signed by both parties.



PHASE 5

Construction

All commitment now signed and recorded Restrictive Covenant, updated permit and accompanying operating technique and additional governance and costings finalised.



PHASE 6

Operate and Handover

n/a. All commitments have taken place and are documented in previous phases. Handover and operation Roles and Responsibilities are detailed in legal documentation (MOUs and Heads of Terms)

APPENDIX 3: COLLABORATION PROFORMA

All requests for collaboration, need to be formalised via a Phase 1 Proforma. The Proforma is hosted on Microsoft Forms. The link is available here: <https://forms.office.com/e/bkEasMe4sa>. If you have printed this Collaboration Guidance Pack, then you can follow the QR Code to access the Proforma instead.



APPENDIX 4: FUNDING CONTRIBUTIONS

The below table presents the general funding principles for each CTW, dependant on the WwTW category. These will be discussed in more detail, along with the estimated costs and governance, as your request and the collaboration progresses.

HEADLINE	SITE PROFILE PACKS & P SCREENING & UPFRONT NBS SCREENING (PHASE 0)	FEASIBILITY STUDY OF WETLANDS (PHASE 1 & 2)	FEASIBILITY STUDY OF FE TRANSFER & SAMPLE CHAMBER (PHASE 3)	OUTLINE DESIGN OF WETLANDS (PHASE 3)	OUTLINE DESIGN OF FE TRANSFER (PHASE 3)	DETAILED DESIGN OF WETLANDS (PHASE 4)	DETAILED DESIGN OF FE TRANSFER & SAMPLE CHAMBER (PHASE 4)	LAND PURCHASE (PHASE 4)	CONSTRUCTION OF WETLANDS (PHASE 5)	CONSTRUCTION OF FE TRANSFER (PHASE 5)	
A	DCWW WwTW has/will have P limit.	100% DCWW (entire scheme funded by DCWW)									
B1	DCWW WwTW P limit. Further 3rd party P reduction. Shared solution	100% DCWW	3rd Party funds	DCWW funds	3rd Party funds	DCWW funds	3rd Party funds	DCWW funds	50/50	3rd Party funds	DCWW funds
B2	DCWW WwTW non-P driver. 3rd party P reduction. Shared solution	100% DCWW	3rd Party funds	DCWW funds	3rd Party funds	DCWW funds	3rd Party funds	DCWW funds	50/50	3rd Party funds	DCWW funds
C	DCWW non-P related driver. 3rd party P reduction. Separate solutions.	100% DCWW	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds
D	DCWW WwTW has no NEP investment scheduled.	100% DCWW	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds	3rd Party funds