

## Confirmed Minutes of the 73<sup>rd</sup> Meeting of the GB Distribution Code Review Panel

6 December 2018

Meeting held at ENA commencing at 1330.

### Attendees:

Name		Company	Representing
Steve Cox	SC	ENWL	Chair
David Spillett	DS	ENA	Code Administrator
Richard Wood	RW	ENA	Code Administrator
Alan Creighton	AMC	Northern Powergrid	DNO (observer)
Matt White (phone)	MW	UK Power Networks	DNO
Nigel Turvey	NT	Western Power Distribution	DNO
Graeme Vincent	GV	SP Energy Networks	DNO
Steve Mockford	SM	GTC	IDNO
Graham Stein	GS	National Grid	OTSO
Martin Queen (phone)	MQ	Ofgem	Authority
Bryan O'Neill (phone)	BO	Ofgem	Authority
Awais Lodhi	AL	Centrica	Supplier
Paul Graham (phone)	PG	UK Power Reserve	BM Generator
Mark Horrocks	MH	McLelland	Users
John Smart (phone)	JS	SSEN	DNO
Tim Ellingham (phone)	TE	RWE Trading GmbH	BM Generator
John Martin (phone)	JM	National Grid	OTSO

### Apologies:

Stew Horne	SH	Citizens Advice	Customers
Ben Vinyard	BV	Waxman Energy	Users
Kate Dooley	KD	Energy UK	Non-BM Generator
Guy Nicholson	GN	Stat Kraft	Non-BM Generator
Mike Kay	MK	P2 Analysis	Consultant
Mark Dunk	MD	ENA	Code Administrator

### 1. Introductions

SC welcomed the Panel members to the meeting of the GB DCRP (the Panel). General introductions were provided and apologies were noted.

### 2. Minutes of previous DCRP meeting 4 October 2018

#### 2.1 Accuracy

With the exception of some minor editorial changes the minutes and actions from the previous DCRP meeting held 4 October 2018 and reported in paper [DCRP\\_18\\_06\\_11](#) were confirmed as correct by the Panel. RW to publish 4 October 2018 Panel meeting minutes to DCode website.

**Action: RW (Complete)**

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## 2.2 Matters Arising

With the exception of the issues below all other actions from the previous meeting were either completed or included on the agenda [DCRP\\_18\\_07\\_01](#).

### 2.2.1 National Terms of Connection - Section – Emergency De-energisation

Referencing paper 18\_06\_02 DS updated the Panel on the progress of this this matter. DS confirmed that DCUSA will consider the concern and a formal modification has now been prepared and submitted which is presented in the above paper. Following some discussions by the Panel it was agreed to request DCUSA to hold back the modification as there was some clarification needed as to what “with prior agreement” actually means or refers to this. Some additional clarification is required.

DS is to request DCUSA to hold back the modification proposal until we can confirm what the key concern is to define “prior agreement”.

**Action: DS**

#### Post meeting update:

GN reviewed the wording following the D Code panel today. He understands that the concern is that the de-energisation is carried out by safe and pre-authorised means. Even in the light of this concern he considers the current wording misleading in that it implies that customer must contact the company before de-energisation, which may cause a life threatening delay. GN suggests that to satisfy both the above concerns the text in yellow

#### *Emergency De-energisation*

5.1 *If, in the reasonable opinion of:*

5.1.2 *the Customer, the condition or manner of operation of the Distribution System or the Connection Equipment poses an immediate threat of injury or material damage to any person or property (including the Customer's Installation), then the Customer shall have the right with the prior agreement of the Company to De-energise the Customer's Installation if it is necessary or expedient to do so to avoid the occurrence of such injury or damage.*

Should be changed to: “using authorised and safe means” or similar wording

### 2.2.2 Open Governance

At the October 2017 DCRP meeting Kate Dooley raised the matter of Open Governance (OG) and that it should be introduced to the DCode. In the minutes of the June 2017 Panel meeting it was recorded that the issue would be revisited in December following a period of time to allow OG in the GCRP to bed in and allow DCRP to learn from any “teething” problems experienced by the GCRP. DS suggested that this issue would be revisited at the October 2018 panel meeting. DS to follow up with National Grid CA to see if there has been any review of OG since its introduction early 2017 and feedback at next the December 2018 meeting.

**Action: DS**

MQ also indicated that there would be some sort of announcement from Ofgem around Christmas time relating to industry codes, which may include reference to Open Governance.

### 3. Grid Code Issues

Referencing paper [DCRP\\_18\\_07\\_02](#) and [DCRP\\_18\\_07\\_03](#), AMC provided the Panel with an update of the key Distribution Code/Networks related issues discussed at the most recent GCRP meeting held 22 November 2018. The key issues were as follows:

- The long awaited GC0096 (Storage) WG consultation is due 7 December
- GC0108 (Black Start) has been approved by Ofgem
- GC0106 (SOGL) will proceed to a Code Administration consultation
- GC0118 (P28) will proceed to a Code Administration consultation following some tidying up of the WG report
- A revised TS 3.02.14 RES re GIS switchgear will be circulated soon (currently applicable to England and Wales only)
- BEIS/ Ofgem review of industry code governance was announced by the Secretary of State, Greg Clarke in November. The ToR for the review will be published soon – could include consideration of merging Codes. A consultation is planned for summer 2019 and dissemination sessions to be held in spring 2019.
- There have been some difficulties securing enough members for WG and arranging meetings when enough members can attend WG. Quoracy will be discussed further.
- A DCRP “Headline Report” is to be developed following each DCRP meeting, to relay information from a DCode perspective to GCRP. The “one pager” style report could also potentially be shared with other codes if required.

**Action; DCode Admin**

Further details can be found in above papers.

SQSS meeting scheduled for November 14 was cancelled.

### **The Panel noted developments.**

#### 4. EU Network Codes

Referencing power point presentation [DCRP\\_18\\_07\\_04](#) RW provided DCRP with a brief update the latest development with regards to the GB implementation of the EU Network Codes. This included updates on;

- System Operation Guidelines. One minute refresh is reported as being the main issue that if passed could create issues. GB has pushed back on this aspect in the past without success and as such is probably likely to get passed. There are changes to G83 and G98, but these were consulted on in April, so the proposal is for the changes to go to Ofgem as part of the GC0106 changes.
- Requirement for Generators. ENA is commissioning a new type testing database for G98 and G99 compliant generation. It should be available for manufacturers to enter new type test data by January 2019. G99 and DCode to be updated in due course. Housekeeping Mods to be subject to a further 3 week industry consultation as there had been some changes arising from the consultation process.
- DER Technical Forum - First meeting took place on Thursday 22 November.

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RW gave a brief summary of the inaugural DER Tech Forum. Extremely well attended event, with first quarter 2019 meetings also arranged.

There is a need to find an appropriate chairman for all DER Technical Forum future meetings. DCRP members were asked to consider candidates from their organisations who may wish to chair this forum. Any respective candidate information to be forward to RW to make contact.

- Equipment Certificate process is being developed by ENA. DCRP indicated keenness to progress the concept of ECs, although concern was raised regarding the role of ENA, other than encouraging others to develop a regime and the need for more than one EC provider before DNOs could really make ECs compulsory. Current progress is noted as being in the hands of potential providers. Ideally DNOs would like ECs to be in place by April 2019 i.e. pre RfG as this will facilitate the initial compliance assessment and help address enduring compliance; however this is unlikely. ENA to continue to facilitate meetings with potential providers. DNOs note they need to start thinking about a “Plan B”, such as a DNO assessment of Manufacturer Information and the uncertainty about enduring compliance under RfG Article 41.

RW to investigate whether ENA could appoint a consultant to assess this aspect regarding manufacturers information collectively, as this should be more efficient than DNOs doing this individually.

## **Action: ENA**

- Demand Connexion Code. Noted as complete.
- E&R; Appear to be no implications for DCRP – but we’re still unclear about the Governance arrangements generally and are waiting for an update of NGETs thinking at the next GCRP

The DCRP were asked to endorse the following items:

- Note progress with SOGL issues
- Confirm that there is no reason to consult again on the D Code and changes to G83 and G98 for SOGL
- Endorse a further 3 week consultation on the housekeeping changes to G98 and G99, following feedback from respondents.

**The Panel noted progress and agreed to endorse the proposals outlined above.**

## **5. Ongoing DCode/Grid Code Modifications – Updates**

### **5.1 *DCRPMP/17/01/03 - The introduction of harmonised Applicable Qualifying Standards in 5.2 DCode to ensure compliance with the EU Connection Codes.***

DS provided a brief update to DCRP on the latest progress of reviewing the relevant DCode Qualifying Standards. Continuing from the previous ITCG meeting; Out of the 18 current Annex 1 & 2 documents approximately seven documents will need to be reviewed to ensure the requirements do not exceed the requirements set out in the EU Network Codes. A number of these seven documents are already under a revision process and the WGs have been asked to include in

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their scope of work and TOR to include the requirement to review the documents to ensure where appropriate they are consistent with the EU Codes and are not setting more stringent requirements. A number of these documents refer to power quality issues which were excluded from the RFG NC. DS indicated he is now in a position to prepare a draft report for circulation and comments. Paper to be published before next DCRP meeting

DS/RW will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

## **5.2 DCRPMP/17/05 - Provision for Energy Storage Devices in the Distribution Code.**

DS provided DCRP with a brief update on progress of this DCRP WG. DS is to start drafting the Dcode legal text along the lines of the GCode proposal. NGET are looking to remove the exclusions in G99/G98 relating to storage. DS to draft a consultation paper to see what feedback comes from stakeholders. This will be a separate consultation. DCRP panel members agreed to seek stakeholder views regarding removing these exclusions.

MK and NGET looking to influence a European discussion on storage to adopt the GC0096 approach on storage – i.e. as generation, rather than have a separate storage code. Next meeting with all WG stakeholders is TBC.

DS/RW will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

## **5.3 EREC G5/5 – Update**

DS updated the group on progress since last meeting of DCRP. The document drafters are reviewing comments made by NPG with the intention of issuing a WG consultation sometime January 2019. GN would like a workshop associated with the consultation process – DCRP agreed that this course of action seems reasonable. Co-ordination with the main consultation required

G5/5 is already being used by one DNO as part of a connection offer.

DS/RW will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

## **5.4 ER P28 – Update**

DS provides update to DCRP group members. The Grid Code working group GC 0118 is now out for public consultation in relation to the proposed ER P 28 changes to the Grid Code. Primarily these are editorial changes. Next steps will be for National Grid to consult on these changes and following that the Distribution and Grid Code administrators will be able to submit a final P28 report to authority seeking approval to publish a revised P28/2. SQSS consultation is noted as proceeding well and OFGEM are considering the possibility to “delink” SQSS change and the GCode/Dcode.

DS/RW will continue to update DCRP on progress at the next meeting.

**Action: DS**

**Panel noted progress.**

## **5.5 *ER G98 & G99 Fast Track Storage.***

RW provided the DCRP with a brief update. The DCRP consultation on storage fast track produced five responses and the Authority had now approved this modification. Stakeholders input and the DNOs responses are being circulated for DCRP information. The approvals documentation is available via the appropriate page on the Dcode website.

**Panel noted progress.**

## **5.6 *DCUSA Change Proposal – De Energisation***

DCUSA Change re Emergency Disconnection.

This item is being discussed in a DCUSA WG. The main issue noted is safety related. DS is maintaining a link with DCUSA. DS has raised this as a DCUSA issue and SC agreed to sponsor the publication of a formal modification proposal. The general view is that prior agreement with a DNO may mean an agreement in a Connection Agreement / SRS, rather than an emergency safety issue, where a non-competent customer can remove a cut out fuse. Most HV / bulk LV customers would have this aspect considered within the connection agreement and have provision of an Emergency Trip Button. DCUSA proposal may need to be changed to add some further clarity. DS/RW will continue to update ITCG on progress at the next meeting.

**Panel noted progress.**

## **6. DCRP Consultations- Approval of Panel to proceed.**

### **6.1 *National Grid Separation – DCRP/18/10/PC***

DS provided update. The paper sets out the proposal to modify the Distribution Code (DCode) to reflect the creation of a new National Grid Electricity System Operator (NGESO) that is legally separated from National Grid Electricity Transmission Limited (NGET) and sought the views from industry stakeholders on the modification to both the ‘DCode’ and the ‘Constitution and Rules of the DCode Review Panel’.

Some concerns were previously raised by Northern Powergrid/AC in relation to proposed changes. Following discussion with National Grid since last ITCG meeting the proposed changes have been dropped and proposed deleted text has been reinstated. The consultation has since been issued and closed. MK had raised issues surrounding the administration costs, although these hadn’t been shared as yet. ENA as code administrator are comfortable with the proposal. The DCRP members agreed with the change and JM will forward the Dcode change to the Authority as part of the pack of legal separation changes.

**Panel noted progress.**

**Action: JM**

## **7. Ongoing DCRP Consultations – Update**

### **7.1 *DCRP/18/09/PC - EREC G99 – Storage Fast Track*** See section 5.5

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## 7.2 DCRP/18/08/PC - DC0079 - Frequency Changes during Large Disturbances and their Impact on the Total System

See section 8.2

## 8. Joint GCRP/DCRP DC0079 Workgroup Frequency Changes during Large Disturbances - Update

### 8.1 Phase 1 - >5MW RoCoF Setting changes update

Referencing paper [DCRP\\_18\\_07\\_06](#) GV provided the DCRP with the latest progress of implementing the changes to the protection settings for >5MW Power Stations. Confirmation that the last remaining site (35 MW) within SPEN area has completed the changes.

Table shown at DCRP meeting below;

#### >5MW Power Stations – All Connections

	Total MW	MW of changed settings	MW not applicable	MW WiP
ENW	486.31 (507.1)	272.56 (106.0)	213.75 (153.8)	0
NPg	2460.4 (2469.4)	387.0 (371.2)	2073.4 (1978.9)	0
SPEN	1903.18 (1903.18)	1313.15 (1296.15)	513.03 (513.03)	35.0 (52.0)
SSEPD	2143.99 (2134.3)	1001.35 (338.7)	1142.64 (816.0)	0
UKPN	1482.02 (1482.02)	853.26 (829.46)	628.81 (628.81)	0
WPD	2431.87 (2582.0)	1141.54 (635.0)	1290.33 (1166.7)	0
<b>As of 30/09/18</b>	10907.77 (10916.77)	4968.86 (4951.86)	5861.96 (5767.36)	35.0 (52.0)

New completed table is shown below;

#### >5MW Power Stations – All Connections

	Total MW	MW of changed settings	MW not applicable	MW WiP
ENW	486.31 (507.1)	272.56 (106.0)	213.75 (153.8)	0
NPg	2460.4 (2469.4)	387.0 (371.2)	2073.4 (1978.9)	0
SPEN	1903.18 (1903.18)	1348.15 (1348.15)	513.03 (513.03)	0
SSEPD	2143.99 (2134.3)	1001.35 (338.7)	1142.64 (816.0)	0
UKPN	1482.02 (1482.02)	853.26 (829.46)	628.81 (628.81)	0
WPD	2431.87 (2582.0)	1141.54 (635.0)	1290.33 (1166.7)	0
<b>As of 06/12/18</b>	10907.77 (10916.77)	5003.86 (5003.86)	5861.96 (5767.36)	0

Panel noted progress.

### 8.2 Phase 2 < 5 MW RoCoF Setting changes - Update

GS provided the Panel with a progress update on the proposals to apply retrospective RoCoF changes to all remaining existing non type tested embedded generating plant <50MW commissioned before 1 February 2018.



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- Implementation plan development nearing completion. Engagement and payment plan is being finalised.
- Management metrics are also being developed.
- SC and Graham Stein are to have meeting with Peter Bingham (Ofgem) regarding the phase 2 implementation. They will raise the issue of enforcement.

Next steps include the implementation plan and final DCode legal text to be presented to the February 2019 DCRP meeting – which will be in the final RTA and in the same package as the Implementation Plan.

**Panel noted progress.**

**Action: GS/SC**

## **9. DCode Qualifying Standards Review**

Referencing paper [DCRP\\_18\\_07\\_07](#) DS provided panel members with a progress update.

DS has reviewed Annex 1 & 2 Qualifying Standards as requested by Ofgem, which was triggered by the revision to P25 and P26 which are (potentially and inappropriately) Annex 1 documents

DS has reviewed again based on the Dcode definition of Annex 1 & Annex 2 (applicability to users as set out in the definition of an Annex 1 Standard). However applying this criteria, the results appear to endorse a ‘no change’ scenario – but this isn’t what Ofgem have in mind.

DS initial view was that some Annex 1 standards would be demoted to Annex 2 status and a couple would possibly be promoted e.g. EREP130. DCRP agreed to this including revision of an Annex 1 standard and also review the allocation of all documents.

Open Networks Team to be asked if there are any Standards that need to be included in the 2019 work programme.

RW to check which DCRP documents need to be included in the 2019 work plan.

There were no further issues and work was progressing to schedule.

**Panel noted progress.**

**Action: MD to provide update**

## **10. Code Administration Update**

### ***10.1 CACoP meeting***

RW provided a brief review of his recent attendance to the CACoP meeting in London. A presentation at CACoP focused on the findings of the 2018 Ofgem Code Administrators Performance Survey with all Code Administrators present. Some concern was raised by the CA’s in attendance that the results would naturally be used to compare code against code, although OFGEM reiterated that this was not the intention. Nonetheless, Dcode administration results were very favourable overall.

MD/RW provided a general overview of Dcode work since last CACoP meeting in September 2018. No issues.

**Panel noted review.**



## **10.2 Panel Membership update**

Members were reminded to review their respective contact details etc. for accuracy and if there are any discrepancies or updates required please respond with any updates etc. to RW.

The panel noted that non-DNO/IDNO DCRP Membership elections are due for 2019 and would make representations for membership ASAP.

**Action: All**

## **11. Revision of EREC P2 – Security of Supply**

Referencing papers [DCRP\\_18\\_07\\_09a](#) and [DCRP\\_18\\_07\\_09b](#), a review of letter received from Bryan O’Neill regarding the Ofgem process for P2 approval, the DCRP indicated satisfaction with the proposed amended/additional “wording” (supported by members). As such, DCRP Code Admin to write to Authority and DCUSA accordingly, sharing new P2 and the list of changes and also confirming that EREP130 will be signed off by end of financial year. It was noted by the panel that DCUSA may want to consider implications on their own code.

It was agreed that the DCRP Code Administrator (CA) write to the DCUSA CA indicating that the DCRP is updating P2, sharing the new proposed P2 and the list of changes. Also confirming that DNO experts sub-group are looking to finalise a draft EREP130 will be signed off by the end of the financial year.

### **AOB**

- TE believes the following information may be of interest to the DCRP; SEC Mod 0046 “Allow DNOs to control Electric Vehicle chargers connected to Smart Meter infrastructure”.

**Panel noted information.**

## **13. Date of next meeting**

- Thursday 7 February 2019 at ENA commencing at 1330.

## **14. Meeting Dates for 2019 (Agreed)**

Thursday 7 February

Thursday 11 April

Thursday 6 June

Thursday 8 August

Thursday 10 October

Thursday 12 December

All meetings to be held at ENA London.