

Confirmed Minutes of the 76th Meeting of the GB Distribution Code Review Panel

06 June 2019

Meeting held at ENA commencing at 1330

Attendees:

| Name | | Company | Representing |
|--------------------------|----|--------------------|--------------------|
| Steve Cox | SC | ENWL | Chair |
| Vincent Hay | VH | ENA | Code Administrator |
| Martin Queen | MQ | Ofgem | Authority |
| Matt White | MW | UK Power Networks | DNO |
| Steve Mockford | SM | GTC | IDNO |
| Graham Stein | GS | National Grid | OTSO |
| Paul Graham (phone) | PG | UK Power Reserve | BM Generator |
| Mark Horrocks (phone) | MH | SPE Electrical Ltd | Users |
| Peter Williams | PW | SSEN | DNO |
| Graeme Vincent | GV | SP Energy Networks | DNO |
| Guy Nicholson | GN | Stat Kraft | Non-BM Generator |

Apologies:

| | | | |
|----------------|-----|----------------------------|------------------|
| Bryan O'Neill | BO | Ofgem | Authority |
| Alan Creighton | AMC | Northern Powergrid | DNO (observer) |
| Stew Horne | SH | Citizens Advice | Customers |
| Ben Vinyard | BV | Social Energy | Users |
| Kate Dooley | KD | Energy UK | Non-BM Generator |
| Gurpal Singh | GS | Ofgem | Authority |
| Kyle Martin | KM | Energy UK | Non-BM Generator |
| Nigel Turvey | NT | Western Power Distribution | DNO |
| Tim Ellingham | TE | RWE Trading GmbH | BM Generator |

1. Introductions

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

1.1. Membership Update

The membership of the DCRP had a number of vacancies to fill. VH clarifies the nomination process to become a member of the DCRP was the chair of the DCRP would make a recommendation for the nominated members to be appointed to the Authority. The Authority would confirm the appointment or make alternative proposals for the membership arrangement. VH had polled industry representatives for participation and was awaiting a response. If the representation was not forthcoming VH suggested the next action would be to poll the DCode mailing list for suitable representation. PG clarified that his representation was on behalf of BM Generators. The Panel clarified Energy UK covered both suppliers and generators so could provide gaps. VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

2. Minutes of previous DCRP meeting 7 February 2019

2.1.Accuracy

The minutes and actions from the previous DCRP meeting held 11 April 2019 and reported in paper [DCRP_19_03_11](#) were confirmed as correct by the Panel subject to minor modifications. VH to publish 11 April 2019 Panel meeting minutes to DCode website.

Action: DCode Admin (Complete)

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. Paper [DCRP_19_03_01](#) refers

2.2.1.Open Governance

At the December 2018 DCRP meeting, David Spillett had taken the action to discuss with the GCode Administrator the GCRP Open Governance (OG) procedures having originally been raised by Kate Dooley that it should be introduced to the DCode. The discussion was deferred for a year to allow for the OG in the GCRP to bed in and allow DCRP to learn from any “teething” problems experienced by the GCRP. VH retained the action taken by 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 the next meeting in August 2019.

Action: DCode Admin

The panel noted progress.

2.2.2.DCRP Headline Report

A DCRP Headline report was to be drafted and this was a standing item for the current agenda. This was to be sent to the GCode and CUSC Administrators. The paper reference was [DCRP_19_04_14](#).

Action: DCode Admin (Complete)

The panel noted progress.

3. Grid Code Issues

3.1.GCRP DAR

Referencing paper [DCRP_19_04_02a](#) & [DCRP_19_04_2b](#), GV provided the DCRP with an update of the key Distribution Code/Networks related issues discussed at the most recent GCRP meeting held on 25 April and 30 May 2019. The key issues were as follows:

- GC0111 - Fast Fault Current Injection specification text Panel unanimously recommended that the Original should be implemented. The Final Modification Report will be circulated, and uploaded w/c 3 June and Appeal window opened.
- GC0124 – Extension of Critical Friend review period for submission of new modifications. The Panel by majority recommended that the Original should be implemented. The Final Modification Report will be circulated, and uploaded w/c 3 June and Appeal window opened.
- GC0127/128 first workgroup meeting held but there may be implications for DNOs (LFDD relay testing periodicity and net demand assessment) and energy storage facilities.

The panel discussed the Grid Code nominations for GC0127 ‘EU Code Restoration – Requirements Resulting from System Defence Plan’ and GC0128 ‘EU Code Restoration - Requirements Resulting from System Restoration Plan’. Members of the panel were asked to provide nominations. At the meeting, members confirmed SPEN and UKPN have nominated or would be nominating a member. Other DCode stakeholders were invited to participate.

The Panel discussed membership on GCode. SC requested an action for VH to provide DNO membership of GCode Working Groups to the DCRP.

Action: DCode Admin

Further details can be found in the above paper.

The panel noted developments.

3.2. SQSS DAR

The paper included for the last meeting [DCRP_19_04_03](#), was not relevant to the DCRP discussion as it referenced an old meeting. GV provided a verbal update to the DCRP with an update of the key Distribution Code/Networks related issues discussed at the most recent SQSS meeting. The key issues were as follows:

- A new version of the SQSS had been published which encompassed 4 modifications.

Further details can be found in the above paper.

The panel noted developments.

4. EU Network Codes

Referencing power point presentation [DCRP_19_04_04](#) VH provided the DCRP with a brief update on the latest development with regards to the GB implementation of the EU Network Codes. This included updates on:

- Transmission System Operation Guidelines: No update at this time.
- Requirement for Generators. ENA has commissioned a new Type Testing Database for G98 and G99 compliant generation which had been broadcast to the wider stakeholder mailing list. It was available for manufacturers to enter new type test data. The ENA's new Type Test Database has 354 entries (as at 27 May). ENA has initiated a high level review is being carried out by Ricardo. To date:
 - All entries have been found to be missing key information or have incorrect information
 - Inappropriate use of N/A where a value is requiredENA will be raising an alert to the manufacturer and DNOs for each incorrect/incomplete entry ENA is urging manufacturers to review their entries, and certainly where any alert is raised ENA may issue some future guidance on the implications of re-submission etc ENA subsequently intends to follow up bilaterally with manufacturers as appropriate, and direct them if necessary to correct any significant non-compliances identified in installed devices and in the supply chain ENA is continuing to support enquires from possible providers of Equipment Certificates
- DER Technical Forum
 - The DER Technical Forum continued to run currently with monthly meetings. Further details available at: <http://www.energynetworks.org/electricity/engineering/distributed-generation/ena-dno-der-technical-forum.html>.
 - Since November 2018 82 issues have been raised with ENA regarding the application of G98 and G99.

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- 67 of the issues have been formally closed off with the agreement of those that raised them.
 - Most of the rest have also received responses and we are waiting for formal agreement to close them.
 - The next meeting will be on 3 July.
- Updates to G98 and G99: The minor technical issues and housekeeping modification was sent to the Authority on 12 April. A decision from the Authority is expected in early June.

Fast fault current injection

- The GC0111 modification underwent a parallel Grid Code and Distribution Code consultation in April, closing on 3 May.
- Three responses were received to the Distribution Code consultation
- Two responses were received to the Grid Code consultation which were both supportive
- The draft report to the authority is included in the papers for this current Panel meeting
- It is proposed to submit to the Authority once the minor technical issues are approved, fixing a new baseline for the text of G99

There are a small number of further minor issues identified that will now be held over for a future update. In the main these are issues identified from the Technical Forum. These include:

Clarification of reactive requirements for Type B power generating modules in relation to the connexion point versus machine terminals

- The relocation of existing G59 compliant generation
- Requirements for CE marking
- Minimum stable operation (to be clarified jointly with NGENSO)
- Further clarifications around LFSM-O and LFSM-U
- A further short list of typographical errors

- DCC – No Update at this time.
- E&R Code:
 - NGENSO published the System Defence and System Restoration plans on 18 December 2018.
 - NGENSO have raised modifications GC0127 and GC0128 to implement formally the requirements of the defence and restoration plans. NGENSO has requested nominations for the working groups GC0127 and GC0128.
 - It appears that NGENSO do not intend to apply the E&R Code obligations on storage to storage connected in GB, unless that storage has an existing contractual relationship with NGENSO
 - NGENSO are considering whether the System Restoration Plan does apply to all embedded generation >10MW (or even possibly 1MW) in GB through the application of DOC9 in the Distribution Code. This could have implications for the resilient communication requirements placed on all such generators (which would also include storage operators)

The DCRP were asked to:

- Note the ENA's activity in reviewing the completeness etc of entries in the type tested database
- Note the DER Technical Forum activity

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- Note the development of the System Defence Plan and System Restoration Plan by NGENSO as Grid Code modifications and to be aware of the possible effect on distribution connected parties.
- Provide nominations for GC0127 and GC0128
- Endorse the submission of the GC0111 Fast Fault Current Injection modification to the Authority

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.

Continuing from the previous DCRP 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 their scope of work, and the TORs, 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 had prepared a revised paper [DCRP_19_03_05](#) which detailed the rationale behind the reclassification of Annex documents to either Annex 1 or Annex 2.

Members had fed back their views on the recommendation to Ofgem for agreement. Whilst some members held views which were alternative to the recommendation [DCRP_19_04_05](#), the panel discussed the review paper and concluded the materiality criteria was clear and the correct classification is detailed in the revised paper attached.

VH to send the recommendation to Ofgem for agreement.

Action: DCode Admin (Complete)

VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress and agreed actions.

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

The GCode had completed a piece of work to apply the requirements of RfG to Energy Storage Devices under GC0096. There was now a piece of work to be completed through the DCRP Working Group to remove any exclusions to RfG for Energy Storage Devices in G99/G98 from the DCode in line with the GCode changes. The initial proposal was now completed by the GCode WG and a proposal GC0096 had now been released. DCRP members suggested it needs to be clear why the proposal is to remove the present 'exclusions' for Elec Storage in the DCode and G98/99. No further update was available at this time. VH took an action to arrange a DCode Storage Working Group to consider the GC0096 proposal.

Action: DCode Admin

The panel noted progress and agreed actions.

5.3.Revision of Engineering Recommendation (EREC) P2 – Security of Supply

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The Report to Authority along with the DCode, EREC P2/7, and appendices were submitted to the Authority in May 2018. The RTA was currently under consideration by the Authority. Update: The Report to Authority was approved on 14 June 2019 to be implemented on 10 August 2019.

With the development of EREP 130 now completed, work had started with the DCRP P2 WG on the 3rd phase of work which was to reengage stakeholders on a possible change to the fundamental standard for security of supply (Table 1). A DCRP P2/8 Working Group was to be held on 10 June 2019 to discuss potential stakeholder engagement material for DCRP P2 WG input. A Terms of Reference had been drafted and included in paper [DCRP_19_04_07](#). Fundamentally, the scope of the P2/8 Working Group is to engage with stakeholders to consider the question “Is there stakeholder support for further work to change the level of Security of Supply defined by P2/7 Table 1?”. This would then feed into any future development of P2/8.

Concurrently, a meeting was to be scheduled with ENA, BEIS and Ofgem to discuss the strategy for the P2 work.

Action: DCode Admin (Complete)

VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress and agreed actions.

5.4.DCRP/MP/19/02 - Revision of Engineering Report (EREP) 130 – Guidance on the Application of P2, Security of Supply

The Report to Authority along with the DCode, EREP 130, and appendices were submitted to the Authority on 29 March 2019 for implementation in line with P2/7. The RTA was currently under consideration by the Authority. Update: The Report to Authority was approved on 14 June 2019 to be implemented on 10 August 2019 along with DCRP/MP/18/03 for the implementation of P2/7.

VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress and agreed actions.

5.5.DCRPMP18/01 - EREC P28 (GC0118) – Update

The Report to Authority was approved by the Authority on 9 May 2019 to be implemented on 23 May 2019. A further modification to the SQSS under GSR025 was expected to support the implementation of P28 in the near future.

The panel noted progress.

5.6.DCRP/MP/18/08 - DC0079 - Frequency Changes during Large Disturbances and their Impact on the Total System

The Report to Authority along with the Implementation Plan, DCode, and G59 amendment appendices were submitted to the Authority on 26 February 2019 for implementation on 1st May. The RTA was currently under consideration by the Authority.

GS provided an update to the Panel. The discussion was summarised under item 8.

VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress.

5.7.DCRP/MP/19/04 – Modifications to the Distribution Code and Associated Documents for a No Deal EU Exit

The Report to Authority along with the revised DCode and associated appendices were submitted to the Authority on 28 March 2019 for implementation on 29 March 2019. The RTA was currently under consideration by the Authority but will likely be rejected as the possible implementation date was shifted to 30 October 2019 in line with the Brexit. VH had sent the Authority a note to confirm Authority's position on "No Deal" Brexit. VH would update the panel once the Authority had responded.

Action: DCode Admin

The panel noted progress.

5.8.Modifications to EREC G99 to reflect the scope in EU 2016/631 in respect of existing power generating modules

Tim Ellingham of RWE had submitted a DCRP paper [DCRP_19_03_06](#) to look at proposing a modification to align EREC G98/G99 with the EU NC Requirements for Generators with respect to modifications to Type A and B generation which were excluded from the RfG scope.

The DCRP had agreed the DER Technical Forum should be the forum to consider this modification proposal and requested the DER TF to report back to the DCRP. VH advised the DER TF had considered the proposal and summarised the following:

- As the Distribution Code approach (which includes G59 and G99) has been applicable since 1990, it is a pre-existing approach that has been assumed to legitimately co-exist with the RfG requirements (there are other examples of this, particularly in the Grid Code).
- The approach is consistent with the principles in the ESQCR for modification of equipment.
- However, DNOs are acutely aware of the challenges that retrospective application brings and are also concerned that retrospective compliance with G99 is not required inappropriately.
- DNOs have already been considering this issue, borne out of discussions at the Technical Forum, and were proposing to amend G99 at the next opportunity
- Additionally, DNOs had promised to develop guidance on what represented a significant modification requiring updated compliance to assist stakeholders with understanding their obligations.

VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress and agreed actions.

5.9.DCRP/MP/19/0X - EREP 131 - Update

EREP 131 "Analysis package for assessment generation security capability – Users' guide was currently under development by a DNO Working Group following the modification to EREP 130. EREP 131 had been revised to support the development of EREP 130 with input from Imperial College London. This involved changes to the calculation spreadsheet to make the tool more user-friendly and include updated guidance to reflect the changes. The development of this document was nearly complete and would be ready to proceed to public consultation ahead of the next DCRP meeting.

The Panel agreed that this modification proposal should aim to be ready to proceed to public consultation at the August 2019 DCRP meeting.

VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress.

5.10. GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements

The panel discussed the GC0117 modification raised by National Grid which would have a material effect on DCode Users. Following the approval of the Transmission System Operation Guidelines, this modification had been raised in an effort to improve transparency and consistency of access arrangements across GB by the creation of common GB requirements for PGMs. Issues such as harmonization of data provision from embedded generation were being considered. This was particularly contentious as currently in Scotland the threshold for generation to provide information to the transmission system operator was 10MW whereas in England this was 100MW. The discussion at the Grid Code Working Group had considered implementing requirements as low as 1MW which had the potential to add significant burden to embedded generators and distribution network operators. The Panel noted the potential impact of the timing of this modification on the Open Networks project which was looking at these arrangements through work streams 1 (T&D Interface) and 3 (Future Worlds). Modifications to the Grid Code now may impact on their work, particularly with the development of the DSO function within Distribution Network Operators. A meeting was scheduled for 10th July which members were encouraged to provide representation to. Additionally when any proposal was consulted upon, members were encouraged to respond with consolidated comments and simultaneously to ensure any impacts were made known.

VH to circulate submission for PC and update DCRP on progress at the next meeting.

Action: DCode Admin(Complete)

The panel noted progress.

5.11. DCRP/MP/19/01 – G98/G99 and G59/G83 Minor Technical Modifications and Editorial Corrections

The Report to Authority along with the DCode, G59, G83, G98, G99, and appendices were submitted to the Authority on 12 April 2019 for implementation on 27 May 2019. The RTA was currently under consideration by the Authority. A decision was expected imminently. Update: The Authority approved the modification on 06 June 2019 for implementation on 16 June 2019. The modification is now live under DCode version 40.

The panel noted progress.

5.12. DCRP/19/05/PC - Modifications to The Distribution Code and EREC G99 of the requirements for Fast Fault Current Injection

The panel endorsed the Report to Authority detailed in [DCRP_19_04_10](#) to be submitted to the Authority once a decision on DCRP/MP/19/01 had been released. A decision on this was expected imminently. Update: the RTA was submitted to the authority on 20 June 2019 for implementation on 22 July 2019. The modification is under consideration by the Authority.

SC raised that the modification of G99 for FFCI could impact on the development of ENA ER G74 which was the ENA guidance document for fault level calculation. VH took an action to query the impact with the document author.

Action: DCode Admin(Complete)

VH to circulate submission for PC and update DCRP on progress at the next meeting.

Action: DCode Admin(Complete)

The panel noted progress and agreed actions.

6. DCRP Consultations- Approval of Panel to proceed.

6.1.DCRP/19/06/PC - DG Connection Guides

The Panel agreed to a 3-week DCode Public Consultation for the revised DG Connection Guides as detailed in [DCRP_19_04_11](#) subject to any required drafting amendments. It is anticipated a Notification to Authority for the revised guide should be prepared for acceptance at the August 8th DCRP meeting.

VH to circulate submission for PC and update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress and agreed actions.

6.2.DCRP/19/07/PC - P18 Issue 2

The Panel agreed to a 4-week DCode Public Consultation of the revised EREC P18 Issue 2 document as detailed in [DCRP_19_04_12](#) subject to any required drafting amendments. Additionally a draft Terms of Reference for a working group to be set up to undertake a more fundamental revision of EREC P18 would be provided with the consultation pack. It is anticipated a draft Report to Authority for EREC P18 Issue 2 should be prepared for acceptance at the August 8th DCRP meeting.

VH to circulate submission for PC and update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress and agreed actions.

7. Ongoing DCRP Consultations – Update

7.1.DCRP/19/03/PC – EREC G5/5

The modification to EREC G5/5 had been submitted to public consultation between 13 March 2019 and 23 April 2019, including the hosting of two DCRP public consultation dissemination events in London on 01 April 2019 and Glasgow on 10 April 2019. A DC0036 WG meeting was scheduled for 7 June 2019. It is anticipated a Report to Authority for EREC G5 Issue 5 should be prepared for acceptance at the August 8th DCRP meeting, subject to the nature of the Stakeholder commentary received and the materiality of any recommended changes. A Grid Code modification GC0129 is to be raised simultaneously. The GCode Admin had raised this modification initially as a housekeeping modification; however, members raised that this would have a material impact on Transmission system Users. MQ was to pick up the modification proposal with the GCode Admin.

Action: MQ

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VH will continue to update DCRP on progress at the next meeting.

Action: DCode Admin

The panel noted progress and agreed actions.

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

8.1. Phase 2 < 5 MW RoCoF Setting changes - Update

The Working Group to implement retrospective changes to generation loss of mains protection under DCRP/MP/18/11 had established the contractual framework for DNO's and NGENSO in order to execute the implementation of the retrospective changes (to be completed by 2022). Additionally, project governance procedures being developed were also nearing completion. Issues raised in response the group's 'Request for Feedback' were also being addressed.

All contracts and governance was expected to be signed off in July, with a kick-off with stakeholders scheduled in August. It was noted that affected stakeholders are now waiting for the programme to start and that they need to be given information on this revised timescale.

Due to the significantly lower volumes of effected generation, and the materiality of the volumes involved, an extended timeline for IDNOs was allowed until the end of December. The project team have been requested to provide regular updates to the DCRP with the first report to be due to the DCRP in August. All information will be made available at the link below.
<http://www.energynetworks.org/electricity/engineering/accelerated-loss-of-mains-change-programme.html>

The panel agreed the modification proposal was a change to the Distribution Code. Subject to the legal and authority agreement, the panel agreed from the point of implementation, they had an obligation to ensure compliance. I.e. the DCRP has implemented a change to the DCode, therefore they have an obligation to manage the change to see it effectively implemented.

In support of this a new Site Information database had been established for generators to be able to register their equipment in preparation for the implementation programme. Testing and development of the system was being undertaken by ENA, National Grid, and a number of DNOs. This was expected to go live in August.

PG noted Users were affected by public information and that the date had slipped. The panel agreed on the need for stakeholders to be kept updated through the project website.

The panel noted progress.

9. DCode Qualifying Standards Review

Referencing paper [DCRP_19_04_13](#) VH provided panel members with a progress update. The only standard of note was ENA EREC P24.

The Earthing Co-ordination Group had outstanding issues requiring input from Network Rail for the completion of EREC P24. Network Rail have now engaged on the outstanding issues and the current draft

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was expected to be circulated to the P24 Working Group middle of next week. The WG was to be allowed 2 weeks for final agreement of the draft with a public consultation expected to be ready to proceed by the end of June.

The panel members noted progress.

Panel noted progress.

10. Code Administration Update

10.1. CACoP meeting

VH was unable to attend the last CACOP meeting so was unable to provide an update. The panel discussed that Ofgem was releasing a consultation on the Future of Codes as part of their Code Review. This was expected at the end of summer. Members anticipated that the consultation was possibly going to explore the establishment of a uniform technical code which encompassed the requirements of the GCode and DCode; however, no information had been publicised.

BEIS had also announced they were undertaking a Standards Review. At this stage, it was anticipated that Dcode Annex standards were to be considered as part of the review but it was not extended to other ENA standards. Mark Dunk was leading on behalf of ENA. An industry day with the standards review panel was planned in which the review panel sought to engage with standards leaders to gain insight into standards. The industry day was planned for June 26th with an invitation to be issued by BEIS imminently.

The panel noted progress.

11. DCRP Headline report

VH to develop and publish a short Headline Report from DCRP meetings that can be shared with other Code Administrators.

VH noted the relevant items for publication and was to publish the report.

Action: DCode Admin (Complete)

DCode Admin noted relevant items.

12. AOB

GN raised an issue with Code governance and the monitoring of Open Networks Steering Group activity and the changing requirements (data provision, etc) that impact on codes. The panels discussed and agreed they need to be responsive to the ON project, but members should be feeding back to the DCRP possible modification requests as new requirements are identified in line with DCode governance procedures.

Panel noted information and agreed actions.

13. Date of next meeting

- Thursday 8 August 2019 at ENA commencing at 1330.

14. Meeting Dates for 2019

Thursday 8 August

Thursday 10 October

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Thursday 12 December
All meetings to be held at ENA London.