

Distribution Code Consultation DCRP/18/09/PC

Title: Storage Fast Track Modifications to G98 and G99

Target Audience: All current and prospective developers, owners and operators of small scale storage devices.

Date Published: 14 August 2018

Deadline for responses: 11 September 2018

Summary:

This Distribution Code public consultation is seeking the views from stakeholders on the proposed modifications to ERECs G98 and G99 to accommodate the fast track storage process.

1 Introduction

The Authority approved the implementation of the EU Network Code “Requirements for Generators” (RfG) on 15 May 2018 (with compliance required from 27 April 2019).

One of the issues that has been in parallel development with the original drafting of G98 and G99 is the treatment of small scale storage, and the “fast track” arrangements for approving its use in domestic (and similar) properties.

2 The Defect

In response to increasing volumes of applications for small scale storage (< 16 A per phase of storage on the same site as existing G83 generation) the ENA co-ordinated a G59 fast track storage procedure, which DNOs have implemented. This allows for a simplified connection procedure, and reduced response times (compared with a standard G59 application). The procedure is in place but is not currently captured in EREC G59.

During the time that G98 and G99 were under development, this was seen as an opportunity to formalise this fast track procedure in the EREC documents. However, the currently published versions of G98 and G99 were close to being ready for consultation prior to submission to the Authority for approval, and DNOs wanted to take sufficient time over agreeing the drafting for the fast track procedure in G99 – hence the fast track drafting forming a separate modification.

DNOs considered that G99 was the most appropriate document to capture the fast track procedure as:

- The original fast track procedure was a G59 fast track, and
- There were concerns about including a procedure in G98 in which total generation capacity would exceed 16 A per phase.

3 The Proposal

It is proposed by the DNOs to modify G98 to make it clear that consideration of fast track applications for storage connections will be dealt with within G99. Section 6.2.2 has been added to G99 to effect this. The procedure written into G99 mirrors that in the ENA document *Fast Track Application Process for EREC G59 Energy Storage Devices – Guidelines May 2018*. In G99, the procedure is called Integrated Micro Generation and Storage. In addition, two new forms have been added to the G99 appendices, for use with the new procedure (A1-2 application form and A3-2 installation document). Again, these forms have drawn upon existing forms in use for the G59 fast track procedure. Copies of the draft modified G98 and G99 are contained in the consultation pack.

As well as being reviewed by DNOs, the drafting has been reviewed by the DCRP Storage Working Group, whose feedback has been considered and incorporated where appropriate.

4 Applicable Distribution Code Objectives

Impact of the modification on the Applicable Distribution Code Objectives:	
Relevant Objectives	Identified impact
To permit the development, maintenance and operation of an efficient, coordinated and economical system for the distribution of electricity	Positive
To facilitate competition in the generation and supply of electricity	Neutral
To efficiently discharge the obligations imposed upon distribution licensees by the distribution licences and comply with the Regulation and any relevant legally binding decision of the European Commission and/or the Agency for the Co-operation of Energy Regulators;	Neutral
To promote efficiency in the implementation and administration of the Distribution Code	Neutral

5 Consultation Questions

- i. Do you agree with the intent of this modification?
- ii. Do you have any particular comments on the drafting of the new requirements in G98 or G99? If so please submit on the pro-forma provided with the consultation pack.
- iii. Do you have any other comments on this proposal?

6 Next Steps

Responses to this consultation should be sent to the Distribution Code Review Panel Secretary at dcode@energynetworks.org by **17:00 11 September 2018** on the pro-forma provided expressly for the purpose. Please note that any responses received after the deadline may not receive due consideration by the Working Group.

For more information, please contact:

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