

Distribution Code Consultation

Title: Entry into Force of the EU Network Code “Transmission System Operational Guidelines”

Target Audience: All Users of the distribution system, ie all connectees at HV and all embedded generators with plant of greater capacity than 16A per phase.

Date Published: 13th January 2017

Deadline for responses: 3rd February 2017

Summary

The Distribution Code requires two minor modifications to DOC5 and DOC7 to ensure it is compliant **with the EU Network Code “Transmission System Operation Guidelines” (TSOG)**.

The TSOG is expected to enter into force in early 2017 and some parts of it are effective immediately. These draft changes are intended to ensure compliance with the TSOG on its entry into force.

1. Introduction

The EU Network Code “Transmission System Operation Guidelines” (TSOG) is expected to come into force (“entry into force” or EIF) in early 2017 (it has been voted on and accepted at the Cross Border Committee, and is now being translated into member state languages before being published in the EU Journal, when it passes into law twenty days later).

As with the connection codes that have already entered into force, most of the TSOG has delayed implementation periods, with different articles becoming active at 12 months 18 months or two years after EIF.

However there are a number of Articles that are immediately effective at EIF. There are about three dozen of the 192 articles that are immediately effective.

The TSOG is likely to have considerable effect on the drafting of the D Code. However these other effects are mainly associated with data transfer and outage co-ordination, and as stated above, will be developed over the next 12 to 18 months, and will result in further separate D Code modification proposals.

2 Analysis and Proposal

The GC0095 joint GCRP/DCRP WG has examined the articles that are effective immediately at EIF. In the main these reflect current GB practices and procedures, and no changes to the Grid Code have been identified.

For the Distribution Code and its scope, there are two places where specific articles in the TSOG require activities that are probably implicit in the GB arrangements, but are infrequently (if ever) exercised and are not explicitly recognized in the D Code drafting.

Article 54.2 requires a User to notify the DNO if there is any “operational disturbance” which affects its ability to retain compliance. There is sentence in DPC8.2.2 that arguably discharges the TSOG requirement, but it is not explicitly linked to the TSOG intent. It is suggested that a simple amendment

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to the definition of “event” as used predominantly in DOC7 (and DOC9) of the D Code would better cover off this requirement.

Article 54.3 requires the DNO to recognize a User initiated test plan so that the User can establish compliance (or for other reasons). The ability of a User to initiate such tests, separate from those jointly undertaken at commissioning etc, is only implicit in the D Code (and G59). A simple modification to DOC5 would make the testing provisions of DOC5 reciprocal in that they can be initiated formally by either DNO or the User.

The draft legal text is attached as appendices 1 and 2.

3 Applicable Distribution Code Objectives

The Applicable Distribution Code Objectives are to:

- a. permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity; and
- b. facilitate competition in the generation and supply of electricity; and
- c. 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; and
- d. promote efficiency in the implementation and administration of the Distribution Code.

4 Consultation Questions

- 4.1 Do you agree that the proposed amendments better achieve the Distribution Code Objectives?
- 4.2 Do you agree with the proposed legal text, or do you have an alternative to propose?
- 4.3 Do you agree that these changes should be implemented as soon as possible to minimize the possibility of non-compliance with the TSOG?

5. Next Steps

Responses to this consultation should be sent to the Distribution Code Review Panel Secretary at dcode@energynetworks.org by **17:00 Friday 3rd February 2017** on the proforma provided expressly for the purpose.

6. Appendices

Appendix 1 – draft Distribution Code legal text for Article 54.3

Appendix 2 – draft Distribution Code legal text for Article 54.2

For more information, please contact:

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DOC5 TESTING AND MONITORING

DOC5.1 Introduction

DOC5.1.1 To ensure that the **DNO's Distribution System** is operated efficiently and within its licence standards and to meet statutory actions the **DNO** will organise and carry out testing and/or monitoring of the effect of **Users'** electrical apparatus on the **DNO's Distribution System**.

DOC5.1.2 The testing and/or monitoring procedures will be specifically related to the technical criteria detailed in the **Distribution Planning and Connection Code**. They will also relate to the parameters submitted by **Users** in the **Distribution Data Registration Code**. Such testing can also be initiated on request from the User for the purpose of the User ensuring compliance with the above technical criteria.

DOC5.1.3 This DOC5 also covers the testing requirements that might be imposed from time to time on **Embedded Medium Power Stations** owned by a **Generator** who is not party to the **CUSC**

DOC5.1.4 The testing carried out under this **Distribution Operating Code (DOC5)** should not be confused with the more extensive **System Test** outlined in DOC12.

DOC5.2 Objective

DOC5.2.1 The objective of this **Distribution Operating Code** is to specify the **DNO's** requirement to test and/or monitor its **DNO's Distribution System** to ensure that **Users** are not operating outside the technical parameters required by the **Distribution Planning and Connection Code** and/or the **Distribution Operating Codes**.

DOC5.3 Scope

DOC5.3.1 This Distribution Operating Code applies to the following **Users** of the **DNO's Distribution System**:-

- (a) **Customers** (it is not intended that the **Distribution Code** will necessarily apply to small **Customers** individually - their obligations will generally be dealt with on their behalf by their **Supplier**).
- (b) **Embedded Generators**.
- (c) **Other Authorised Distributor** connected to the **DNO's Distribution System**.
- (d) **Suppliers**.
- (e) **Meter Operators**.

DOC5.4 Procedure Related to Quality of Supply

DOC5.4.1 The **DNO** will from time to time determine the need to test and/or monitor the quality of supply at various points on its **DNO's Distribution System**.

DOC5.4.2 The requirement for specific testing and/or monitoring may be initiated by the receipt of complaints as to the quality of supply on the **DNO's Distribution System**.

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DOC7 OPERATIONAL LIAISON

DOC7.1 Introduction

DOC7.1.1 This **Distribution Operating Code DOC7** sets out the requirements for the exchange of information in relation to **Operations** and/or **Events** on the **DNO's Distribution System** and on the immediately adjacent parts of adjoining **Systems** which have had (or may have had), or will have (or may have) an **Operational Effect**.

- (a) on the **DNO's Distribution System** or on the **System** of any other **User** in the case of an **Operation** and/or **Event** occurring on the **System** of a **User**, and
- (b) on the **System** of a **User** in the case of an **Operation** and/or **Event** occurring on the **DNO's Distribution System** or the **National Electricity Transmission System**,

where no requirement for liaison is specified in any other section of the **Distribution Code**.

DOC7.1.2 The requirement to notify in DOC7 relates generally to communicating what has happened or what is to happen and not the reasons why. However, DOC7 provides, when an **Event** has occurred on the **DNO's Distribution System** which itself has been caused by (or exacerbated by) an **Operation** or **Event** on a **User's System**, the **DNO** in reporting the **Event** on the **DNO's Distribution System** to a **User** can pass on what it has been told by the **User** in relation to the **Operation** on that **User's System**.

DOC7.2 Objective

To provide for the exchange of information so that the implications of the **Operation** and/or **Event** can be considered and the possible risks arising from it can be assessed and appropriate action taken by the relevant party in order to maintain the integrity of the **Total System** and the **User's System**. This **Distribution Operating Code** does not seek to deal with any actions arising from the exchange of information, but merely with that exchange.

DOC7.3 Scope

This Distribution Operating Code applies to the **DNO** and to **Users**, which in this Distribution Operating Code means:-

- (a) **High Voltage Customers**.
- (b) **Embedded Generators** connected to the **DNO's Distribution System** at HV.
- (c) **Other Authorised Distributors** connected to the **DNO's Distribution System** at HV.

(d) **Suppliers** on behalf of their **Customers** where appropriate

Distribution Operating Code (DOC)	That portion of the Distribution Code which is identified as the Distribution Operating Code .
Distribution Planning and Connection Code (DPC)	That portion of the Distribution Code which is identified as the Distribution Planning and Connection Code .
Distribution System	The electrical network operated by an Other Authorised Distributor .
Distribution Use of System Agreement	The standard form of agreement of that name, as amended from time to time.
Earthing Device	A means of providing a connection between an Isolated conductor and earth.
Electricity Safety, Quality and Continuity Regulations (ESQCR)	The statutory instrument entitled The Electricity Safety, Quality and Continuity Regulations 2002 as amended from time to time and including any further statutory instruments issued under the Act in relation to the distribution of electricity.
Embedded	Having a direct electrical connection to a Distribution System .
Embedded Generator	A Generator including a Customer With Own Generation whose Generation Sets are directly connected to the DNO's Distribution System or to an Other Authorised Distributor connected to the DNO's Distribution System . The definition of Embedded Generator also includes the OTSO in relation to any Embedded Transmission System
Embedded Transmisison Licensee	Offshore Transmission Licensee for an Embedded Transmission System
Embedded Transmission System	An Offshore Transmission System directly connected to the DNO's Distribution System or to an Other Authorised Distributor connected to the DNO's Distribution System .
Entry Point	The point at which an Embedded Generator or other Users connect to the DNO's Distribution System where power flows into the DNO's Distribution System under normal circumstances.
Equipment	Plant and/or Apparatus .
Electricity Supply Industry (ESI)	Electricity Supply Industry.
Event	An unscheduled or unplanned (although it may be anticipated) occurrence on or relating to a System including, without limiting that general description, faults, incidents and breakdowns and adverse weather conditions being experienced. <u>It includes an occurrence where the compliance of Customer's Equipment with this Distribution Code, or where relevant the Grid Code, is, or might be, compromised.</u>