

Distribution Code Consultation Response Proforma

DCRP/18/010/PC: National Grid Legal Separation changes to the Distribution Code

Stakeholders are invited to respond to this consultation, expressing their views or providing any further evidence on any of the matters contained within the consultation document. Stakeholders are invited to supply the rationale for their responses to the set questions.

Please send your responses and comments by **17:00 on 29 October 2018** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/18/10/PC '. Please note that any responses received after the deadline may not receive due consideration by the Working Group.

Any queries on the content of the consultation pro-forma should be addressed to DCode Administrator on 020 7706 5174, or to dcode@energynetworks.org

Respondent	<i>Mike Kay</i>
Company Name	P2 Analysis Ltd
No. of DCode Stakeholders Represented	None
Stakeholders represented	<i>None</i>
Role of Respondent	<i>Independent Industry Consultant</i>
We intend to publish the consultation responses on the DCode website. Do you agree to this response being published on the DCode website? [Y/N]	Y

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	Question	Response	Response by DNO's
Q1	Do you agree that the proposed amendments achieve the Distribution Code Objectives?	No. The change is neutral to the first three of the Distribution Code Objectives, but is detrimental to the fourth – ie to the efficient implement and administration of the D Code.	DNO's agree that it is not administratively sensible to implement the change but have agreed to allow National Grid and the DCode Administrator to submit this change if they are able to.
Q2	Do you agree with the proposed text contained in the draft legal text for the DCode and the Constitution and Rules of the DCode Review Panel, or do you have any alternatives to propose?	<p>In the Distribution Code you have introduced dozens and dozens of change, all of which for consistency with established practice should be hyperlinked.</p> <p>The sensible approach will be to redefine NGC to mean NGESO, but leave NGC unchanged throughout the text – except in the TWO instances where it needs to be NGET – for which a new definition of NGET can be introduced – although it could simply be replaced with NGET's full name where it is needed rather than needlessly expand the definitions. Based on my extensive experience of fourteen years of maintaining the Distribution Code document this will save hours of future administration of the document.</p> <p>The definition of Medium Power Station can revert to the pre BETTA definition of England and Wales rather than use NGET.</p>	<p>The DCode Code Administrator will take a pragmatic approach with National Grid to ensure the administrative burden of the change is minimised.</p> <p>The DCode Administrator sees the main advantage of approving the new organisational definitions is to ensure maximal clarity to the user interpreting the DCode.</p> <p>To avoid any unnecessary administration, a version of the DCode will be submitted with track changes which shows the material changes to the DCode text and content.</p> <p>If or when the change is accepted by the Authority, the extensive hyperlinking (which has no materiality to the content or rules of the code) aspect will be completed in the published version of the DCODE.</p>