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Modification proposal:	**Distribution Code: DCRP/17/03 – Revision of Engineering Recommendation (EREC) P25**		
Decision:	The Authority[1] has decided to approve[2] this modification		
Target audience:	Distribution licensees, Distribution Code Review Panel, distribution network users and other interested parties		
Date of publication:	29 January 2018	Implementation date:	1 March 2018

Background

Electricity Distribution Licence holders are required by Standard Licence Condition (SLC) 20 of their licences to have in force, implement, and comply with the Distribution Code. SLC 21 imposes a duty on licence holders to review and, where appropriate, seek our approval for modification of the Distribution Code so as to better achieve the requirements of SLC 21. The Distribution Network Operators (DNOs) may propose changes to the Distribution Code and initiate work on a review of the Code through the Distribution Code Review Panel (DCRP).

The Energy Networks Association (ENA)'s Engineering Recommendations P25[3] and P26[4] (P25, P26)[5] provide guidance relating to short circuit characteristics for 230V single-phase supplies and 400V three-phase suppliers respectively. P25 and P26 are referenced in Annex 1 of the Distribution Code and are incorporated within the Distribution Code as part of its technical requirements. Therefore any modification to P25 or P26 constitutes a change to the Distribution Code and requires our approval. The current versions of P25 and P26 came into effect in 1996 and 1985.

Drivers for the proposed changes to P25 and P26

As set out above, the technical requirements of the Distribution Code are subject to review from time to time. P25 and P26 were reviewed by an ENA working group that found updating was required to reflect accurately the latest methods and standards used and referenced by the distribution licensees. It was also noted that P25 and P26 referred to similar requirements on the Low Voltage network so it was proposed to merge the two documents into a new version of P25 to improve simplicity.

Industry consultation process

A consultation opened on 17 March 2017 and closed on 14 April 2017. Email notification of this consultation was sent to industry stakeholders and published on the Distribution Code website[6]. Included in the circulation was the British Standards Institute committee, JPEL/64 (Electrical Installation of Building) who govern British Standard 7671, the IET Wiring Regulations.

In total, there were 5 respondents to the consultation representing industry bodies and distribution licensees. There were no major comments raised during the consultation. All

[1] References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.
[2] This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.
[3] P25 (The short circuit characteristics of electricity boards low voltage distribution networks and the co-ordinaltion of overcurrent protective devices on 230V single phase supplies up to 100A)
[4] P26 (The estimation of the maximum prospective short circuit current for three phase 415V supplies)
[5] P25 and P26 are available at http://www.dcode.org.uk/annexes.html
[6] http://dcode.org.uk/consultations.html

comments received during the consultation were addressed in the final draft documents submitted to the DCRP on 4 January 2018.

The modification proposal

DCRP/17/03 proposes to merge P25 and P26 given the close similarity between the two documents. The modification proposes to withdraw and archive P26 with references to it within the Distribution Code moved to P25. The modified P25 would reflect the latest terminology, short-circuit calculation assumptions and low voltage generation considerations for both single-phase and three-phase systems.

Distribution Code Review Panel (DCRP)[7] comments and licensee recommendation

At the DCRP Panel meeting on 4 January 2018, a unanimous vote of the DCRP considered that the modification proposal would better facilitate the Distribution Code objectives and therefore recommended its approval.

Our decision

We have considered the issues raised by the modification proposal and in the Final Report dated 8 January 2018. We have considered and taken into account the responses to the consultation on the modification proposal, which are included in the Final Report.[8] We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the applicable objectives of the Distribution Code;[9] and
- approving the modification is consistent with our principal objective and statutory duties.[10]

Reasons for our decision

We consider this modification proposal will better facilitate Distribution Code objective (a) and has a neutral impact on the other applicable objectives.

(a) permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity

Given the technical nature of the documents and that improvements in calculation methods have occurred since they were last reviewed we agree that an update was required. By updating the methods and calculations held within P25, alongside merging it with P26, we believe that the changes proposed better facilitate the development of the distribution system because it will better reflect modern understanding and best practice.

Due to the health and safety impact of this modification, we consulted with the HSE, in accordance with section 3C of the Electricity Act 1989. The HSE were aware of the consultation and that the working group had engaged with the relevant BSI committee,

[7] The DCRP is established in accordance with SLC 21 of the Electricity Distribution Licence.
[8] Distribution Code proposals, final reports and representations can be viewed at: http://www.dcode.org.uk/areas-of-work/ and http://www.dcode.org.uk/consultations/
[9] As set out in Standard Condition SLC 21.4 of the Electricity Distribution Licence available at: https://epr.ofgem.gov.uk//Content/Documents/Electricity%20Distribution%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current%20Version.pdf
[10] The Authority's statutory duties are wider than matters which the Panel and licensees must take into consideration and are largely provided for in statute, principally in this case the Electricity Act 1989.

JPEL/64, and that the working group addressed the concerns raised by the committee. The HSE have no comment to make on the detail of the modification.

Decision notice

In accordance with SLC 21.11 of the Electricity Distribution Licence, the Authority hereby directs that the modification to the Distribution Code set out in the Final Report to the Authority of 8 January 2018 be made.

Peter Bingham
Chief Engineer
Signed on behalf of the Authority and authorised for that purpose