# Distribution Code Consultation Response Proforma

## DCRP/19/03/PC: Engineering Report 130

## Guidance on the application of Engineering Recommendation P2, Security of Supply

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 7th March 2018** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/19/03/PC EREP 130'. 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 5124, or to dcode@energynetworks.org

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| **Respondent** | *William Cass* |
| **Company Name** | Energetics |
| **No. of DCode Stakeholders Represented** | 1 |
| **Stakeholders represented** | *Energetics.* |
| **Role of Respondent** | *Independent Distribution Network Operator* |
| **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]** | Yes |

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| | Question | Response |
|---|---|---|
| Q1 | Do you agree that the proposed amendments to EREP 130 achieve the Distribution Code Objectives? | The amendments to ERP 130 perhaps miss an opportunity to further '*permit the development, maintenance and operation of an efficient, co-ordinated and economical system for the distribution of electricity*' in the Class A range of Group Demand within P2.<br><br>Class A networks, which comprise largely residential developments, are less likely to have contracted non-network assets which can be factored into a contribution towards network security. The effective use of DG, DSR and ES will happen on Class B and above networks.<br><br>Class A networks are therefore largely excluded from the impact the changes to ERP 130 are meant to make in the application of P2 towards achieving Distribution Code objectives.<br><br>The anticipated uptake of electric vehicle chargers however will have the opposite effect by introducing high load, high load factor demands on Class A networks. This will ultimately lead to an increase in the number of Class A networks required to supply any given low voltage demand; resulting in a less efficient, less economical system.<br><br>The reclassification of Class A from 'Up to 1MW' to 'Up to 1.5MW', or above, may go some way towards addressing the issues this imminent increase in demand will bring.<br><br>With this change, new Class A compliant residential substations supplying EV load could be designed up to perhaps 2MVA while still only supplying the same number of customers as existing 1MVA substations supplying non EV load customers.<br><br>In addition, it is anticipated that current 1 MVA capacity networks which may require to be reinforced due to EV uptake may benefit from the ability to upgrade transformer capacity to 1.5MVA without the need to re-engineer civil aspects of the substation, or indeed establish additional substations |
| Q2 | Do you agree with the proposed text contained in the draft EREP 130 Issue 3, or do you have any alternatives to propose or indeed any comments relating to the specific technical content of the EREP? | |

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Please provide comments relating to the specific technical content of the EREC[1]

| Page / line No | Clause/ Subclause | Paragraph Figure/ Table | Type of comment (General/ Technical/Editorial) | COMMENTS | Proposed change | OBSERVATIONS OF THE SECRETARIAT on each comment submitted |
|---|---|---|---|---|---|---|
| Table A | | | Technical | As above | Class A be raised to 'Up to 2MW' | Comments noted above. No change to document due to the following.<br><br>Regarding the existence of 'contracted non-network assets' – there is no stipulation in EREP 130 with regards to the voltage level at which non-network solutions may be connected. Although EREP 130 may allude to typical network configurations in the examples, there are no exemptions on the class of supply that the guidance may be applied to.<br><br>Regarding the reclassification of Class A 'Up to 2MW' – this is a consideration for P2 revision and although the opportunity to discuss this during Issue 7 development is passed, it has been noted by the P2 Working Group for the future development of Issue 8. The extension of Class A up to 2MW may be complicated by those existing 2MW demand groups classified as Group B who receive the corresponding FCO criteria. |
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[1] Add more rows if required