

ADE

No direct comment on D Code text – but some of the comments re aggregators probably need reflecting in D Code approach.

Electricity North West

Question	Answer	D Code response
Do you agree that DNOs should only implement the Demand Response requirements relating to Demand Response Active Power Control and Demand Response Reactive Power Control, recognizing that the other DSR services in Article 27 are services for the Transmission System Operator?	No, agreed that DNOs do not manage frequency (b)(i) demand response system frequency control should be excluded. There is a presumption that very fast active power control is solely to manage frequency, is that definitely the case or are there other potential ? Also under a whole system approach couldn't DNOs/ DSOs procure services for transmission constraint management. These proposals should not prevent such developments if they are in the best interests of consumers.	Very fast active power control is defined in Article 2(21) as being in response to a frequency deviation. So for DCC compliance (ie in the immediate short term) it seems safe to assume this is not a DNO service. However there is nothing to stop such a service being developed in the future. If a DNO was procuring services on behalf of the TSO then the DSO would be acting as an aggregator and presumably would be able to either work under same regime as other aggregators contracted to the TSO, or possibly able to do this under its own DCC legal powers – but in this case it might be appropriate to modify the D Code and other distribution documentation to specifically cover this possibility.
Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?	Yes, we do not agree with the proposed approach. The pro-forma document seems to request information that is not specified in Article 32(6). Implementation should focus on doing the minimum to ensure compliance not adding additional regulatory burdens.	Electricity North West provided a number of detailed comments on the proformas, particularly suggesting that the information went beyond what was required by the DCC. Whilst one or two items included in the form (such as MPAN) are not DCC requirements, this information is believed to be helpful and might well be required as terms of any contract. The documentation has been designed to be flexible and can easily be changed if some

		aspect is found to be inappropriate based on experience.
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Flexitricity

Question	Answer	D Code response
Are the rights and obligations of aggregators appropriately allowed for in the drafting of ECC and DPC9? If not, what additional provisions would you suggest?	<p>The default response time specified in DPC9.3.3.3 is in the frequency response range, rather than active or reactive power DSR range. A default of something along the lines of 5-10 minutes would make more sense.</p> <p>The data specified in DPC9.4.1 being specified one month in advance is fine, but must be implemented correctly for aggregated groups. If new units are added to a group, this should not bar the rest of that group from operation for example.</p> <p>The references to other pieces of EU legislation (EU 2016/631 etc) in the definition of 'Manufacture's information' in DPC9 should be more explicit so that providers are not being made to wade through EU legislation. The paperwork required from providers should be described clearly by the DNO procuring the service in the service contract, rather than sending the provider needing to be versed in EU legislation.</p> <p>There is no mention of aggregators or aggregation in the ECC that I could see, so if there are any, they are difficult to find.</p>	<p>Agree that 5s is too short a default. Suggest we set the default to 5 minutes.</p> <p>Agree with the intent. The phrase "or such other time as agreed" has been introduced where default timings are stated.</p> <p>This is a read across from the RfG into the DCC. It does envisage a regime where manufacturers are part of a certification programme – it is not yet anywhere near a working implementation for generation – let alone demand. However we believe we need to lay down a path for it.</p>
Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is	<p>There is no distinction necessary for HV and LV customers.</p> <p>Where is 'fully type tested' defined?</p>	Noted with thanks.

no distinction necessary here for HV or LV customers?	<p>The obligations in DSR3 are either excessively complex or poorly expressed. Who will be carrying out these tests for individual sites, how will it be verified?</p> <p>How much manufacturer involvement does ENA actually expect to have in this process? Will there be any incentive for manufacturers to participate, especially considering that DNO DSR is currently rare and made up mostly of short term contracts.</p>	<p>See comments above – it is a read across again from the RfG and possibly important for future compliance streamlining</p> <p>As above for now.</p>
Do you have any views on how to tailor the compliance process, and documentation, to accommodate both individual Demand Response Service Providers and those Demand Response Service Providers who are aggregators?	The easiest way to do this is to have the compliance and documentation process be on a site by site or unit by unit basis, and then have a secondary process for assigning compliant, documented units or sites to aggregated groups. If the units are not tested and documented individually, the other units in an aggregated portfolio would be forced out of the market every time a new unit joins, or has a temporary outage.	Yes – in fact this is what were attempting to do: DSR3 needs to be completed for every unit – and these would be aggregated on DSR2. But happy to talk through this to use your experience to improve our approach.

SPEN – no specific D Code comments

Northern Powergrid

Question	Answer	D Code response
Legal Text Issues		
	Connection Point, Reactive Power, Demand Facility, Customer are all defined terms and should be capitalized and bold where used.	Agree. Corrected.
	Definition of Demand Unit - Would it be clearer to say what is in the scope of DPC9 ie all Demand Units, where there is a contract to provide demand side services (Is an appliance / device	The Scope statement DPC9.1.1. does this.

	<p>only a Demand Unit when its contracted to provide Demand service)</p> <p>Do the dates relate to the procurement of the Demand Unit, or agreement of contracts to use that Demand Unit to provide a Demand service</p> <p>These dates don't look right 7 and 9 September</p>	<p>The DCC is clear that the critical date is the date the DU was connected to the network (or the contract for it was signed).</p> <p>Typo. Corrected.</p>
	DPC9.1.1 - ... in general or to any appliance or devices that are not Demand Units	Not obvious quite what distinction is being sought or made here.
	DPC 9.3.1.2 - Don't quite see why for LV at least these wouldn't be 0.9 to 1.1 pu	Agree – the drafting was wrong. Now corrected.
	DPC 9.3.3.2(b) - didn't quite follow the 'or as will be deployed' part of this clause	It just really saying that the DNO will provide details of the communications protocols to be used – either between a single customer or to an aggregator. This might be more obvious now in the alternative version of the text.
	DPC9.4.1 Semicolons missing at end of lines	Agreed. Inserted
	DPC 9.4.3 and DPC9.4.4- ...Provider as appropriate must notify....	Agreed. Inserted
	<p>DRUD intro note - Might it be better to use the term Demand Response Providers who are not individual Customers - or define aggregators?</p> <p>In the DCode, the term used is (as an undefined term) demand side service. DCC uses Demand Response Service</p> <p>Wondered if there was a consistent term emerging from ON that we should use. I can see that the intention isn't to append this to the DCode in any way, but consistency would be good.</p>	<p>Modified for this.</p> <p>This page is not legal text - it was just included to help the consultation – It is not expected to exist as part of the suite of documentation in the future.</p>

	Is there a risk that commercial aggregators will focus only on the money so in the aggregator sentence should this say '...Distribution Code compliance (including full technical compliance)....' to stress the point.	D Code compliance is only technical – so this should not be necessary
	<p>DSR 1 Part 1 - ...each phase of the..... phased is used earlier in the sentence</p> <p>Customer signature - Not checked with the G83 forms, but is the customers signature required here</p> <p>Demand facility- not premises</p> <p>Align the tops of columns</p> <p>Capitalize defined terms</p> <p>Operational Monitoring is not a defined term – possibly add note or footnote “where required by DSR agreement” or ref DPC9.3.3.6</p>	<p>Changed</p> <p>Yes</p> <p>Changed</p> <p>Changed</p> <p>Done</p> <p>Not clear that the reference is needed – this will be a key contractual part of the arrangements. Capital M changed to lower case.</p>
	<p>DSR1 Part 2 - are separate Operational Monitoring checks required for the Demand Facility and Demand Unit?</p> <p>as above just wondered about the acronym DSR</p> <p>Declaration: Not checked for consistency with G83 forms, but this text wouldn't be deleted - just not completed</p>	<p>A good question. This will probably depend on case by case basis. Generally it will probably be at the facility level - more operational experience necessary to inform this.</p> <p>Changed to contractual purposes</p> <p>This is identical to G83</p>
	DSR 2 - Is there a need somewhere to define an Aggregator (GCode definition?)	It is not defined in the Grid Code. But the preamble to the proformas now explains that an aggregator is a Demand Service Provider for multiple Demand Facilities.

	<p>Is a copy of this document required for each Demand Facility.....or is there one form per Demand Service Provider / Aggregator contract with a DNO?</p> <p>Is a customer signature needed</p> <p>Operational monitoring – add reference to DPC9.3.3.6?</p> <p>Is it the Demand Units that's failed or the Demand Service Provider / Aggregator who's failed?</p> <p>I can see how to populate this table for a Demand Facility ie with an MPAN. Are we also looking to capture details of each Demand Unit as well - if so this could probably be clearer on the form.</p> <p>Didn't quite follow this N/A - couldn't Manufacturers Information be used to demonstrate compliance with the Operation Range</p>	<p>It is envisaged one per aggregator per contract - hence the contract reference box at the top of the details</p> <p>Consistent with other forms. Changed to Aggregator</p> <p>As above this will need to be done DNO by DNO, contract by contract</p> <p>Valid point – amended.</p> <p>No -just the MPAN. It should be for the aggregator to ensure compliance of each facility/unit.</p> <p>This is a mistake. Corrected.</p>
	<p>DSR 3 - In DPC9 this is 180s rather than 5.</p> <p>might it be worth adding a footnote to explain where this would be N/A</p>	<p>Correct – now amended to refer to DPC9</p> <p>Changed from NA to No.</p>
	<p>DSR 4 - Is this decommissioning of the DSR capability or the decommissioning of the contract to activate the DSR capability</p>	<p>Could be either – so forms cates for this.</p>

RWE – no specific D Code comments

SP Generation– no specific D Code comments

SSE

Question	Answer	D Code response
Do you agree that DNOs should only implement the Demand Response requirements relating to Demand Response Active Power Control and Demand Response Reactive Power Control, recognizing that the other DSR services in Article 27 are services for the Transmission System Operator?	<p>The approach to be followed by providers of demand response services should, according to the DCC, be harmonised. We see no recognition of this requirement for harmonisation by the Proposer of GC0104.</p> <p>Without this harmonisation there is a risk that DSR providers have to meet multiple requirements for the same demand modulation depending on whether it is provided to the relevant system operator or relevant TSO.</p> <p>As noted above, this lack of harmonisation in the GC0104 proposal will lead to increased costs for consumers, will not achieve the best social welfare outcome and will not be reasonable, proportionate or efficient.</p>	Noted
Are the rights and obligations of aggregators appropriately allowed for in the drafting of ECC and DPC9? If not, what additional provisions would you suggest?	Given the total lack of detail in this consultation around what the 'Ancillary Services agreement' requires of aggregators; in terms of the DCC; it is difficult to say what the rights and obligations, in totality, are and, therefore, it is difficult to say if this has been suitably allowed for in the drafting of ECC and DCP9.	Noted
Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?	<p>Given that the DCC obligations are to be harmonised then so should the documentation; i.e. it should not matter whether the service is provided to the relevant system operator or the relevant TSO, in both cases the form to be completed should be the same and should only need to be completed once.</p> <p>Notwithstanding the above, we note that the General Data Protection Regulation (GDPR) is</p>	There are different requirements for some T and D services. Moving to an identical approach could subject those customers only providing services to DNOs to unnecessary requirements. However the integration and harmonization of DSR services between T and D is a substantial part of the Open Networks Project WS1, and we expect that those developments will feed through into the

	due to be applicable in the near future. We notice that the draft installation document contains customer personal data – could the Proposer please confirm, in light of the GDPR obligations, that the proposed installation document is fully compliant with the GDPR obligations.	formal approaches over the next couple of years.
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Also some of the comments on the Grid Code probably need reflecting in D Code approach.

UK Power Reserve

Question	Answer	D Code response
Do you agree that DNOs should only implement the Demand Response requirements relating to Demand Response Active Power Control and Demand Response Reactive Power Control, recognizing that the other DSR services in Article 27 are services for the Transmission System Operator?	Yes, although as the DNO-DSO transition evolves, they should not be precluded from future discussions.	Note and we agree.
Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?	UKPR do not see any necessary distinction between LV and HV customers. At the moment, the nature of potential Demand Response services is unclear, but the proforma includes sufficient information.	Note and we agree.

WPD

Question	Answer	D Code response
Do you agree that DNOs should only implement the Demand Response requirements relating to Demand Response Active Power Control and Demand Response Reactive Power Control,	WPD broadly agrees with this distinction. However confusion may arise where a DNO implements a service on the behalf of the Transmission system operator (as will be trialled	Noted. This of course might suggest changes to the D Code drafting and approach. Given the developing nature of these services, and the Open Networks

recognizing that the other DSR services in Article 27 are services for the Transmission System Operator?	in the WPD RDP work with National Grid). This is also the case in the Power Potential project.	initiatives, it will be necessary to keep formal GB documentation under constant review – although of course the highest level and lightest touch approach will probably remain desirable.
Q6 Are the rights and obligations of aggregators appropriately allowed for in the drafting of ECC and DPC9? If not, what additional provisions would you suggest?	The current drafting explicitly allows for participation of aggregators and third parties. If anything the proposal favours third parties over direct customers as they have less onerous requirements in the pro-formas. WPD would encourage equal treatment of aggregators and direct customers.	Please see answer below to Legal Text Issues
Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?	WPD agrees with the pro-forma approach subject to the comment in Q6. WPD agrees that there is no distinction necessary for HV and LV customers.	Noted.
Do you have any views on how to tailor the compliance process, and documentation, to accommodate both individual Demand Response Service Providers and those Demand Response Service Providers who are aggregators?	As per question 6, WPD would encourage the maximum alignment between compliance and documentation for aggregators or direct customers. For example the current pro-formas require more information on the specific Demand Units for individual customers over aggregators (Technology types, Manufacturers reference number...) Aggregators should be expected to provide the data expected of customers. In addition WPD believes that some of the requirements should be better defined to avoid confusion (for example is the modulated output value expected to be the Maximum or Minimum response capacity?). Finally the compliance checks must be reviewed with a view to the practicality of testing required. For example the current DPC9 wording allows	As per the response on Legal Text Issues below. In addition, as stated below, the logic here was striving to force Aggregators to make/take the same checks that the DNO would do itself – but without telling the Aggregator exactly what to do. Of course, some more direct instruction to the Aggregator could be put into the contract. We don't think the drafting to date has caught the concept of maximum or minimum response capacity (ie assuming this is a response band). Our initial response to this point is that it could be whatever was defined in the contract.

	significant flexibility for DNOs in terms of the manner in which modulation signals are sent and the response time. By contrast the pro forma requires customers to respond to a non-specific signal within 5 seconds	Agree that the 5s was a mistake. It has been changed to be either of the contract value or a default of 5 minutes.
Legal text issues	<p>WPD has identified the following concerns around the legal text of DPC9.</p> <ul style="list-style-type: none"> - The definition of Demand Service Provider include direct customers, however these are then treated as a distinct subset. For example DPC9.1.1 and DPC 9.1.2 could be merged. This unnecessary distinction is carried throughout the text (9.2.1, 9.2.2....) - The definition of a Demand Unit may cause confusion for a system made up of components and sub-components. Clarification could be provided on the limits of the definition. For example in a BMS with multiple HVAC units each comprised of fans and pumps, what is a demand unit and what isn't? - Demand units including storage are exempt from DPC9. Further clarification may be required as many systems could be considered to have storage (a HVAC unit may claim to have thermal storage). 	<p>The original drafting attempts to apply equal treatment to end customers but where an aggregator is involved, the drafting of both DPC9 and the DRUD are attempting to set a framework where the aggregator undertakes the assurance of compliance by customers and then the aggregator passes this assurance on to the DNO (in form DSR 2). That is why the distinctions were made in the original drafting. Subsequently, and following discussions with a small number of aggregators, it does seem that combining the roles of Demand Service Provider and Customer would be a sensible simplification.</p> <p>We agree that Demand Unit could be a confusing concept -but the DCC only gives limited clarity in this regard. The working assumption we have had to date is that each or all the HVAC units under the control of a single controller would form the Demand Unit.</p> <p>The DCC of course does not cover storage – but our current view is that that is irrelevant. We should just treat it as the physics dictates. Also probably worth noting our assumption that storage in EU Network Terms means electricity storage as opposed to energy storage.</p>