

Confirmed Minutes of the 70th Meeting of the GB Distribution Code Review Panel

7th June 2018

Meeting held at ENA commencing at 1330.

Attendees:

Name		Company	Representing
David Spillett	DS	ENA	Code Administrator
Graeme Vincent	GV	SP Energy Networks	DNO
Graham Stein	GS	National Grid	OTSO
John Smart	JS	SSEN	DNO
Gurpal Singh	GS	Ofgem	Authority
Guy Nicholson	GN	Element Power	Non-BM Generator
Tim Ellingham	TE	RWE Trading GmbH	BM Generator
Awais Lodhi	AL	Centrica	Supplier
Nigel Turvey	NT	Western Power Distribution	DNO
Alan Creighton	AMC	Northern Powergrid	DNO (observer)
Paul Graham	PG	UK Power Reserve	BM Generator
Steve Mockford	SM	GTC	IDNO
Mark Horrocks	MH	McIleland	Users
Matt White	MW	UK Power Networks	DNO
John Martin	JM	National Grid	OTSO

Apologies:

Steve Cox	SC	Electricity North West	Chairman
Stew Horne	SH	Citizens Advice	Customers
Martin Queen	MQ	Ofgem	Authority
Sotiris Georgiopoulos	SG	UK Power Networks	DNO
Ben Vinyard	BV	Segen	Users
Kyle Martin	KM	Energy UK	Non-BM Generator

1. Introductions

In the absence of the Chairman, DS welcomed the Panel members to the meeting of the GB DCRP (the Panel). General introductions were provided and apologies were noted.

DS informed the Panel that this may be his last meeting due to him accepting a new job role. The Panel thanked David for all his efforts over the years supporting the Panel and wished him well in his new role.

2. Minutes of previous DCRP meeting 5 April 2018

2.1 Accuracy

With the exception of some minor editorial changes the minutes and actions from the previous DCRP meeting held 5th April 2018 and reported in paper [DCRP_18_02_07](#) were confirmed as correct by the Panel. DS to publish 5th April 2018 Panel meeting minutes to DCode website.

Action: DS

2.2 Matters Arising

With the exception of the issues below all other actions from the previous meeting were either completed or included on the agenda [DCRP_18_03_01](#).

National Terms of Connection - Section – Emergency De-energisation

DS informed the Panel that he has raised this matter with the DCUSA Code Administrator and will aim to present this issue at the next DCUSA Panel meeting. The DNOs agreed to take an action to see what the local arrangements are for emergency de-energisation and this information will be required in advance of attending the DCUSA Panel meeting.

Action: DS/DNOs

Open Governance

At the October 2017 Panel meeting KD raised the matter of Open Governance (OG) being introduced to the DCode. In the minutes of the June Panel meeting it was recorded that the issue would be revisited in December following a period of time to allow OG in the GCRP to bed in and allow DCRP to learn from any “teething” problems experienced by the GCRP. DS suggested that this issue would be revisited at the next meeting of the DCRP. DS to follow up with National Grid CA to see if there has been any review of OG since its introduction early 2017.

Action: DS

3. Grid Code Issues

Referencing papers [DCRP_18_04_02](#) AMC provided the Panel with a brief update of the key Distribution Code related issues discussed at the recent GCRP meeting held 16 May. The key issues were as follows.

- GC0104 Demand Connection Code will proceed to Code Administrators Consultation.
- On 15 May Ofgem approved GC0100, 0101 and 0102 related to the EU Requirement for Generators Network Code. This brings into effect the updated version of the Grid Code, Distribution Code, EREC G98 and ERECG99 as of 16 May 2018. This formally concludes four years of debate and discussion to develop these new documents. There are a few outstanding issues being addressed by GC0110 and GC0111 and a further housekeeping modification is required to change the documents to have the correct implementation date which is 20 days earlier than documented.
- GC0096, Storage can now proceed as GC102 has been approved which sets out the baseline GCode text. It was recognised that the E&R Network Code imposes retrospective requirement on storage plant and that this needs to be considered by the WG.
- GC0106 DCC. It’s likely that the WG will seek guidance from GCRP on the significant work required to codify the three WACMs proposed at the last WG meeting. The issue relates to the legal interpretation of ‘unless otherwise provided’

Further details can be found in paper [DCRP_18_04_02](#).

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Panel noted developments.

4. EU Network Codes

Referencing power point presentation [DCRP_18_04_03](#) DS provided the Panel with a brief update on the latest development and progress with regards to the GB implementation of the EU Network Codes. Following the presentation and brief discussions the Panel was invited to note and endorse the following:

- The initiation of joint working on modifications for LFSM-O and FFCI with the GCRP First WG meetings on 06 June 2018.
- The GC0104 consultation scheduled to close on 08 June 2018
- The implications of the E&R code on Distribution Code documents – and possible future modifications to accommodate this code

GN asked a question relating to commercial implication of changes to frequency limits. DS will seek a response from the appropriate National Grid representative.

Action: DS

The Panel noted progress and agreed to endorse the proposal outlined above.

5. New DCode/Grid Code Modifications

5.1 Housekeeping Modifications to G98, G99 and the Distribution Code.

Referencing paper [DCRP_18_04_04](#) DS updated the Panel on the progress on the necessary housekeeping modifications required to DCode G99 and G98 following their recent approval by the Authority. There are three key housekeeping modifications required and are as follows:

- An erroneous implementation date of 17 May 2019 was used in the drafting. The correct date should be 27 April 2019. In approving ERECs G98 and G99 the Authority asked that this mistake was corrected
- In parallel with the development of EREC G98 and G99, modifications have recently been approved by the Authority that change the requirements for loss of mains protection fitted to distributed generation. These changes now need to be applied to G98 and G99.
- A number of typographical errors have come to light in G98 and G99, all of which are inconsequential, but the opportunity can now be taken to correct them.

Given that these proposed modifications are of a housekeeping nature (i.e. the date correction and the typographical errors) or have already been extensively consulted on in the DC0079 consultations, the Panel can elect to make use of, subject to the assent of the Authority, paragraph 21(e) of the Panel's Constitution and Rules:

“When agreed by a majority resolution of the Panel a proposed modification will normally go out to public consultation. In certain cases where minor modifications have been approved unanimously, the Panel may decide not to go out to public consultation, subject to the agreement of the Authority”.

Subsequently the Authority and the Panel unanimously agreed that the modification report should be submitted to the Authority immediately. DS will submit the report as directed.

Post Meeting Update – Report to Authority was submitted on 11 June 2018.

5.2 EU Network Code – DCRP/MP/18/05/Report to Authority – Demand Connexion Code

This modification is to implement the Demand Connexion Code (DCC) into the GB arrangements, and specifically the Distribution Code. Following a brief overview by DS the Panel agreed to the submission of the DCC Report to Authority, subject to there being no significant new issues raised by stakeholders, as the Panel agreed that the Modification proposal better facilitated the objectives of the Distribution Code.

It is expected that this Report and the corresponding Grid report will be submitted following the GCRP meeting on 28/6.

5.2 EU Network Codes – likely Distribution Code Modifications over the next few months.

Paper [DCRP_18_04_04a](#) sets out the likely DCode modifications that will take place over the coming months. The recent approval of G98 and G99 in May has prompted a number of modifications that need to be progressed to deal with issues that have arisen in relation to these documents. At the same time other European Codes, notably the System Operations Guide Lines (SOGL) and Demand Connection Code (DCC) will need to be formally incorporated into the Distribution Code via modifications.

This activity will create a number of DCode modifications that need to be progressed in a short time. Paper [DCRP_18_04_04a](#) explained these modifications to the DCRP and sought their agreement, in the interests of efficiency, to a programme of modifications that can be progressed as far as possible without formal recourse to the Panel before each consultation is initiated. Some of the modifications, particularly those to G98 and G99, will be of importance to manufacturers and others who need to ensure compliance by 27 April 2019 and will be concerned that we are able to progress each issue as quickly as possible.

There are a number of longstanding pieces of work unfortunately coming to implementation at a similar time. The DCode Administrator needs to ensure that they are all introduced and processed appropriately without conflict and confusion. The plan set out in appendix 1 of paper [DCRP_18_04_04a](#) shows how these modifications can progress in an orderly manner, and still allow for changes to modification submission and approval dates – although the plan will need to be recut each time a date changes. The DCode Administrator recognizes that this implies a substantial number of rapid updates that Code users will need to alert to, and that this needs to be done in such a way as to minimize confusion.

The Panel was asked to note the proposed programme and subsequently gave its assent in progressing each of the above modifications in accordance with the plan. The DCode Administrator will keep the Panel informed by email of each submission or other key milestone or change to the plan.

Action: DS

5.3 Future likely updates to G99

Paper [DCRP_18_04_04b](#) outlines other known issues in particular with the new ERG99 that are not urgent, but which should be resolved in good time before it comes into force in April 2019. Those issues include:

- Fast track storage applications

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- Type tested interface protection
- Subtle interface protection testing differences between synchronous and asynchronous power generating modules
- Interface protection testing for high RoCoF
- Improvements relating to the connexion process

These issues should be progressed with some urgency – certainly in advance of time that manufacturers, developers etc need to take to be fully prepared for April 2019 RfG compliance. However given the attention that is now being given to considering the practical implementation challenges by stakeholders, with the exception of the fast track storage modification, it is probably worth waiting until the early autumn to see if any similar issues arise, as it might be efficient to deal with some or all of these issues in a single modification.

The DCRP discussed this proposal and subsequently give its assent in principle for the DCode Administrator to initiate a DCRP WG in the autumn to pick up these issues and any others that may have emerged by then.

Action: DS & ITCG

5.4 DCRPMP/18/02 ‘National Grid Legal Separation changes to the Distribution Code’

On behalf of National Grid JS provided an update via slide pack presentation on the progress on the National Grid separation project and the subsequent need to modify the DCode to take cognisance of the separation into a National Grid System Owner and System Operator. Following the presentation the Panel agreed that normal distribution code governance procedures should apply and that this modification should proceed directly to Consultation. DS will also circulate the slide deck to Panel members.

Action: National Grid (JM) and DS

6. On-going DCode/Grid Code Modifications

6.1 DCRPMP/17/0103 - The introduction of harmonised Applicable Qualifying Standards in DCode to ensure compliance with the EU Connection Codes.

DS provided a brief update to the Panel on the latest progress of reviewing the relevant DCode Qualifying Standards. Out of the 18 current Annex 1 & 2 documents approximately seven documents will need to be reviewed to ensure the requirements do not exceed the requirements set out in the UE Network Codes. Several of these seven documents are already under a revision process and the WGs have been asked to include in their scope of work and TOR to include the requirement to review the documents to ensure where appropriate they are consistent with the EU Codes and are not setting more stringent requirements.

DS will continue to update the Panel on progress at the next meeting.

Action: DS

Panel noted progress to date.

6.2 DCRPMP/17/05 - Provision for Energy Storage Devices in the Distribution Code.

DS provided the Panel with a brief update on progress of this DCRP WG. The second WG meeting was held on 1 May. Work is progressing with a view of introducing direction to storage requirements in the

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DCode to the new ER G98 and G99 documents. There will also be a need to consider the requirements on storage which are set out in the SOGL. Next meeting with all WG stakeholders is TBC.

Panel noted progress.

6.3 GC - LFSM-O compliance requirements for Type B PGMs

Referencing paper [DCRP_18_04_05](#) DS provided the Panel with an overview of the modification proposal. This is a simple modification, prompted by AMPS, to introduce some additional clarity around what a compliant LFSM-O response looks like. The RfG specifies what is required – but not how quickly it must be delivered, which given it is a frequency management issue, timing is crucial. The draft legal text and background has been circulated to the WG in advance, in the expectation that we could agree it in a report back to the Grid Code Panel, seeking then an immediate Code Administrator consultation – and parallel appropriate DCRP consultation and process.

The first WG meeting was held on 6 June. The WG has drafted a consultation document and the consultation should open towards the end of June.

The Panel noted progress.

6.4 GC - Fast Fault Current Injection RFG compliance requirements

Referencing paper [DCRP_18_04_05a](#) DS provided the Panel with an overview of the modification proposal which aims to update the Grid Code and ERG99 with revised text for fast fault current injection to dispel any confusion in interpretation of the existing text. This will be delivered by a Joint Grid and Distribution WG.

The Panel noted developments and subject to any final comments from members agreed to the two proposed joint panel modification proposals.

7. DCRP Reports to Authority – DCRP agreement to submit reports

7.1 DC0079 (submitted 27/03/18)

Referencing paper [DCRP_18_04_06](#) DS informed the Panel that on 3 May the Authority approved the modification DC0079 (Phase 2). The modification proposes changing the RoCoF settings for all new type-tested generators <5MW, bringing them into line with the existing requirements for all non-type-tested generators <5MW. This modification also proposes to remove VS as a suitable form of LoM protection for all new type-tested generators <5MW. The modification also proposes that all new type-tested generators should be able to demonstrate immunity against a rate of change of frequency that is marginally less than 1Hzs-1 with a 500ms time delay and a vector shift of up to 50°. The implementation date is 1 July 2018.

Panel noted Authority decision.

7.2 EREC P28

DS informed the Panel that the ER P28 report to Authority was submitted on 17 May 2018

Panel noted progress

All DCRP meeting papers can be found [here](#).

7.3 EREC P2/7

DS informed the Panel that the ER P2/7 report to Authority was submitted on 31 May 2018

Panel noted progress

8. Joint GCRP/DCRP DC0079 Workgroup Frequency Changes during Large Disturbances Update

8.1 Phase 1 - >5MW RoCoF Setting changes update

Referencing paper [DCRP_18_04_07](#) DS provided the Panel members with the latest progress of implementing the changes to the protection settings for >5MW Power Stations. No change since the last meeting in January. There still remains only one site (52MW) within SPEN area that requires completing the changes. It is expected that this final site should be completed by end of June 2018.

>5MW Power Stations – All Connections

	Total MW	MW of changed settings	MW not applicable	MW WiP
ENW	486.31 (507.1)	272.56 (106.0)	213.75 (153.8)	0
NPg	2460.4 (2469.4)	387.0 (371.2)	2073.4 (1978.9)	0
SPEN	1903.18 (1903.18)	1313.15 (1296.15)	513.03 (513.03)	35.0 (52.0)
SSEPD	2143.99 (2134.3)	1001.35 (338.7)	1142.64 (816.0)	0
UKPN	1482.02 (1482.02)	853.26 (829.46)	628.81 (628.81)	0
WPD	2431.87 (2582.0)	1141.54 (635.0)	1290.33 (1166.7)	0
As of 31/05/18	10907.77 (10916.77)	4968.86 (4951.86)	5861.96 (5767.36)	35.0 (52.0)

8.2 Phase 2 < 5 MW RoCoF Setting changes - Update

8.2.1 DC0079 Retrospective Application to remaining plant <50MW and revised DCode – Consultation

Referencing papers [DCRP_18_04_07a](#) GS provided the Panel with a progress update on the proposals to apply retrospective RoCoF changes to all remaining existing embedded generating plant <50MW commissioned before 1 February 2018. The next key phase is to undertake a public consultation seeking view from GB stakeholders on the proposals. A workshop is being held on the 15 June at ENA and also in Glasgow (date to be confirmed) to discuss the proposals with interested stakeholders. DS will circulate to the Panel details of the two workshops.

Action: DS

The Panel noted progress with the DC0079 work and the intent to formally consult on the implications and legal text changes in the near future. The Panel was also invited to offer any suggestions as to the engagement needed with the large and disparate number of affected customers.

Action: All

9. DCode Qualifying Standards

9.1 May 2018 progress update

Referencing paper [DCRP_18_04_08](#) DS provided the Panel members with a progress update on all Annex and Annex 2 qualifying standards currently undergoing revision.

GN raised some concerns relating to the review of ER G5/4 via WG DC0036 formerly GC0036. This has been a lengthy project and it was now nearing public consultation stage which is expected to open on the 16 June subject to any last minute comments/issues from WG.

GN suggested that during the consultation there should be an industry stakeholder workshop that would provide stakeholders with the key updates to the EREC. The Panel agreed to this proposal to ensure industry engagement and transparency, especially as it is approx 9 years since this mod was first raised.

Action: G5/5 WG

There were no further issues and work was progressing to schedule.

Panel noted progress.

10. Ofgem DCode Qualifying Standards Review

Referencing paper [DCRP_18_04_09](#) DS provided the Panel with a progress review of the work to review all Annex I and Annex 2 Qualifying Standards to ensure they meet the specific DCode criteria for being assigned as a Qualifying Standard. DS informed the Panel that he had undertaken an assessment of the standards using the materiality test contained in the DCode consultation and rules document and his findings were included in appendix 1 of the paper.

DS suggested that a small group of DCRP stakeholder reps should meet to review the assessment undertaken by DS to substantiate or disagree to his findings. The Panel agreed to this proposal and DS is to canvass for nominees to this group.

Action: DS

11. Panel membership Update – Proposals for New Membership

Referencing paper [DCRP_18_02_06](#) DS provided the Panel with a brief update on DCRP membership. Members were asked to review their respective details for accuracy and if there are any discrepancies or updates required please respond with any updates etc to DS.

Action: DS/All

12. Code Administration Issues

Referencing paper [DCRP_18_03_10](#) DS provided the Panel with a brief update on recent Code Administrators (CAs) Meeting held 19 March. Three key issues included:

12.1 Brexit

DS carried out an initial trawl which was discussed at the DCRP Meeting in 26 October 2017. Following the licence and industry code analysis the DCRP and all other code administrators had undertaken, Ofgem arranged a workshop on 26 January 2018 to:

- Present their findings from a consolidated analysis of licence conditions and industry code trawl;
- Present their expectations on how any necessary modifications should be delivered.
- Discuss their finding and expectations, to identify any concerns and next steps in advance of a consultation in February 2018.
-

There were about 220 workshop participants including the Ofgem lead and experts, Code Panel chairs and Code Administrators. Ofgem's analysis following the code trawls of EU references highlighted the following:

- Approximately 334 modification have been identified of which 183 relate to Gas
- The modifications fall into 5 main themes for example references to EU entity, or to Law, or Standards.
- There are some modifications that are more complex, such as certification and access regimes, information gathering powers and alignment with changes in other sectors of EU Law
- There were none that would be inoperable (in the event they were not removed in time)
- The scope of the modifications appears manageable;
- There is nothing to stop the codes preparing for housekeeping modifications on the basis of what is known thus far;
- Biggest risk is if Statutory Instruments are raised prior to March 2019, as these may impact the initial transition of EU law into UK.

In terms of code modification process Ofgem has identified two options:

- The normal sequential process with Licence modifications followed by Code modifications; or
- A compressed process whereby the licence modifications and code modifications are carried out in parallel.

Ofgem believe the compressed process provides the best opportunity to deliver the project on time. This will be further discussed under The Code Administrator Coe of Practice which was the forum chosen for further discussions.

The Panel noted the developments.

12.2 Ofgem Innovation Link (Sandbox)

DS informed the Panel that Ofgem are proposing a new CACoP principle that supports the Ofgem Innovation link/sandbox. The principle will set down that Code Administrators shall support prospective energy innovators by providing guidance on their codes to any applicant including those not acceded to said code(s). Ofgem will act as the coordinating and external facing body and will be responsible for receiving and assessing information from applicants. For applicants seeking to trial an innovative product or service, code

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administrators will assess and recommend temporary derogations to Ofgem. There are 6 elements to the principle and DS will share the document with the Panel for comments.

Action: DS/All

12.3 Code Administrators Code of Practice central website

DS updated the Panel on proposals put forward by the DCUSA Code Administrator that the CACoP should have its own centrally held website. Currently each individual Code website has a separate CACoP page. This proposal follows stakeholder feedback from earlier Code Admin surveys requesting a single source where users could access for example -

- More information about the CACoP and topics under discussion
- Increased transparency of Cross Code Issues
- A calendar of cross code meetings and workgroups
- The central modifications register: and
- Contact Information for Code Administrators.

It is proposed that the cost of building the website will be shared evenly between all the CACoP members. Responsibility for maintenance of the site will rotate with the CACoP secretary every 12 months

DS indicated that he would share the DCUSA paper setting out the proposal and members are invited to provide feedback on the proposed scope of the website and seek confirmation that the Panel members are willing to support this initiative.

Action: DS/All

13. AOB

None

14. DCRP Administrative Review

The Panel was happy and content with the Code administration services.

15. Date of next meeting

- **Thursday August 9th at ENA commencing at 1330.**

Please note that this meeting will be held at the new ENA office location at 4 More London Riverside, London SE1 2AU.

[Directions can be found here.](#)

13. Remaining DCRP & ITCG Meeting Dates for 2018

All DCRP meeting papers can be found [here](#).

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- Thursday 4th Oct
- Thursday 6th Dec

All meetings will be held at ENA London.

All DCRP meeting papers can be found [here](#).