

Distribution Code Review Panel**Meeting 66 - 26 October 2017#****EU Network Code RfG – DCRP Consultation Timelines****Paper by Mike Kay****Background**

The development of drafting of the Distribution Code and its associated documents for the implementation of the RfG has been undertaken as joint work with the Grid Code Review Panel. This is appropriate for two principal reasons – firstly because the RfG makes little distinction between T and D connected generation equipment, so the technical requirements are common between the two codes. Secondly many of the technical requirements that will apply right down to 1MW are familiar to transmission connected generation, but are new requirements for distribution connected generation (and DNOs).

Specific technical issues have been consulted on jointly (in GC0100 and GC0101), and the remaining issues, and complete legal drafting, is being consulted on jointly in the GC0102 Working Group consultation running 19 October to 9 November.

This paper considers the ongoing implementation work that is the DCRP's responsibility.

Current Plans

GC0102 is being run under the GCRP open governance arrangements, whereby an initial WG consultation is designed to flush out all relevant technical issues, such that the WG can hone legal text, and any legitimate alternatives, for a Code Administrator consultation on the legal text. This is currently planned for the end of December. Under GCRP governance if the CA consultation results in significant new issues that causes a change in the legal text, it will be necessary to reconsult on the revised legal text.

Although the DCRP work has run to date as part of the GC0102 process, there is no concept of WG or Code Administrator consultations and no similar formal restrictions on the legal text being so tightly locked down. Ofgem's powers in relation to approving modifications to the Grid Code and Distribution Code are also subtly different. Therefore it should be recognized that after the current GC0102 closes in early November subsequent consultations should be run separately and more clearly under the DCRP and GCRP respective governance rules (although of course the timings can still be harmonized).

The GC0102 timeline has been constructed by National Grid to assume a CA consultation over Christmas and the New Year, such that National Grid can make a report to the authority on all the G Code changes in February 2018. Ofgem's internal guidance and target for modification processing is 25 working days. This could result in an Authority decision on GC0102 in March 2018. This allows in theory a small window for Ofgem not to accept the modification and to send it back for rework and resubmission before the implementation deadline of 17 May 2018.

Recognizing that there are substantially more new issues for distribution stakeholders, and that the number and variety of distribution stakeholders is greater than for transmission, it is prudent that we plan for an additional public consultation on Distribution Code (and associated documentation and process implications) drafting etc. Currently it is not the DC Administrator's intent to use a third consultation; however the purpose of this paper is to raise the possibility as a prudent consideration, and to alert the DCRP to its implications.

Also, for contingency planning, if Ofgem do require 25 working days to approve DC modifications then the absolute latest date that DC documents can be submitted is 09/04/18 – but this assumes that Ofgem would approve the drafting, including using their powers of amendment if necessary. It therefore seems prudent to plan to avoid using this contingency.

The timelines discussed above are summarized below:

Existing GC0102 timeline

- First (WG) consultation - 19/10/17 – 9/11/17
- Second (CA) consultation - 18/12/17 – 11/01/18
- Report to The Authority - Feb 18.

Proposed DCRP consultation

- With GCRP - 19/10/17 – 9/11/17
- DCRP - 26/10/17
- DCRP - 07/12/17
- Second consultation with GCRP – but separate - 18/12/17 – 11/01/18
- Third consultation (if necessary) - 05/02/18 – 23/02/18
- DCRP - 08/02/17
- Report to the Authority - 12/03/18
- DCRP - 05/04/18
- Backstop date for submission to Ofgem - 09/04/18

Recommendation

The DCRP is asked to note and discuss the proposed consultation timelines above.

The Panel is invited to discuss if any additional Panel meetings might be appropriate, or changes to existing proposed meeting dates.