
Distribution Code: DCRP/MP/24/01 Minor technical modifications to EREC G98 and G99

Decision: The Authority¹ determines that this modification should be made²

Target audience: Distribution licensees, Distribution Code Review Panel, distribution network users and other interested parties

Date of publication: 14 February 2025

Implementation date: 10 March 2025

Background

Engineering Recommendation G98 (EREC G98)³ and Engineering Recommendation G99 (EREC G99⁴) were created on the 23 July 2018 as Annex 1 documents of the Distribution Code. They set out the requirements of connections to the Great Britain distribution network at different voltage levels. These documents are reviewed at regular intervals and modified where necessary to ensure up-to-date and accurate compliance with both network and device requirements.

The modification proposal

DCRP/MP/24/01 was proposed by Distribution Network Licensees via the Energy Networks Association (ENA) on 7 October 2024. It proposes several changes to EREC G98 and G99 to:

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 [EREC G98 Requirements for Connection of Fully Type Tested Micro-generators](#)

⁴ [EREC G99 Requirements for Connection of Generation Equipment](#)

The Office of Gas and Electricity Markets

10 South Colonnade, Canary Wharf, London, E14 4PZ **Tel** 020 7901 7000

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- cascade low frequency behaviour of storage required by the Grid Code, as introduced via Grid Code modification GC0148 to new distribution connected storage⁵
- implement numerous minor amendments identified by stakeholders to the ENA's Distribution Energy Resources Technical Forum

Full details of all the changes proposed within DCRP/MP/24/01 can be found on the ENA's Distribution Code website.⁶

DCRP/MP/24/01 was subject to a consultation between 4 June 2024 and 9 August 2024, receiving four responses which were supportive of the changes proposed.

The proposer considers that the modification will have a positive impact on Distribution Code objective (i)⁷ and (iii)⁸ by introducing Limited Frequency Sensitive Mode – Underfrequency (LFSM-U) functionality to storage; and will have a neutral impact on all other objectives.

Distribution Code Review Panel (DCRP)⁹ comments and licensee recommendation

At the DCRP Panel meeting on 3 October 2024, the DCRP recommended that the modification proposal should be submitted to the Authority for approval.

Our decision

We have considered the issues raised by the modification proposal and in the Final Report dated 7 October 2024. We have considered and taken account of the responses to the consultation on the modification proposal which are included in the Final Report.¹⁰ We have concluded that:

⁵ [GC0148: Implementation of EU Emergency and Restoration Code Phase II](#)

⁶ [DCode - The Distribution Code of Licenced Distribution Network Operators of Great Britain](#)

⁷ Distribution Code Objective (i); Permit the development, maintenance, and operation of an efficient, coordinated, and economical System for the distribution of electricity.

⁸ Distribution Code Objective (iii); Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant Legally Binding Decision of the European Commission and/or Agency.

⁹ The DCRP is established in accordance with SLC 21 of the Electricity Distribution Licence.

¹⁰ Distribution Code proposals, final reports and representations can be viewed at: [Current Areas of Work](#) and [Open Consultations](#)

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- implementation of the modification proposal will better facilitate the achievement of the applicable objectives of the Distribution Code¹¹
- approving the modification is consistent with our principal objective and statutory duties¹²

Reasons for our decision

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

(i) To permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity

We agree that the introduction of LFSM-U to new distribution connected storage will increase the robustness of the system. This requires storage in operation to export Active Power in response to frequency falling below a defined threshold, aiding the restoration of system frequency. We consider that a more robust system better permits the development, maintenance and operation of the transmission system, and therefore consider that this modification has a positive impact on this objective.

(iii) Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant Legally Binding Decisions of the European Commission and/or Agency for the Co-operation of Energy Regulators

We note that the introduction of LFSM-U to new distribution connected storage was cascaded from Grid Code modification GC0148, which implemented Commission Regulation (EU)

¹¹ As set out in Standard Condition SLC 21.4 of the Electricity Distribution Licence available at: [Licences and licence conditions | Ofgem](#)

¹² 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.

2017/2196 establishing a network code on electricity emergency and restoration.¹³ We therefore consider that this modification has a positive impact on this objective.

(iv) Promote efficiency in the implementation and administration of the Distribution Code

We note that a significant proportion of the minor changes proposed in this modification clarify or amend existing requirements; and were raised by Distribution Network Operators (DNOs) and Distribution Code stakeholders principally via the ENAs Distribution Energy Resources Technical Forum. We consider such changes to have a positive impact on the understanding of the Distribution Code requirements, and so to promote efficiency in its implementation. We therefore consider this modification to have a positive impact on this objective.

Decision notice

In accordance with SLC 21.10 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 7 October 2024 be made.

Maria Liendo

Head of Technical Analysis & Assurance

Signed on behalf of the Authority and authorised for that purpose

¹³ [COMMISSION REGULATION \(EU\) 2017/2196](#)