

Distribution Code Consultation DCRP/MP/23/05

Title: Modification to DOC6 to allow protection from disconnection, where technically feasible, for customers when implementing demand disconnection at levels above 20% of total demand.

Target Audience: All current and prospective users of the distribution system, but especially the operators of sites that are protected under the Electricity Supply Emergency Code.

Date Published: 16 October 2023

Deadline for responses: 17 November 2023

Summary:

This consultation paper is seeking stakeholders' views on proposed changes to the legal text of the Distribution Code that will extend the exclusion from disconnection, where technically feasible, to those sites in the event of an OC6 instruction from National Grid Electricity System Operator (NGESO) to the DNO to disconnect demand of more than 20% of total demand.

The Distribution Operating Code (DOC) allows Distribution Network Operators (DNO) to enact demand control stages which, as currently drafted, do not fully allow for a site to be afforded protection from disconnection should demand control be implemented by the DNO. This may result in supplies to critical infrastructure sites being interrupted under emergency conditions. This modification proposal is to change the Distribution Code so that DNOs are permitted to maintain supplies to critical infrastructure sites, where technically feasible, when they implement demand disconnection stages of more than 20% of the total demand.

1 Background

The Distribution Code Review Panel consulted on the effects of GC0161 in its consultation DCRP/MP/23/03 between 24 July 2023 and 18 August 2023. DCRP/MP/23/03 has resulted in changes to DOC6.1.2, DOC6.1.3 and DOC6.4.3 which were approved by The Authority on 15 September 2023 with an agreed implementation date of 02 October 2023.

This modification proposal will provide alignment with respect to demand control requirements following the Government's Electricity Shortfall Prioritisation Review. The wording in the Grid Code did not allow the exclusion of sites protected under the Electricity Supply Emergency Code (ESEC) from disconnection under OC6 demand control requirements. NGESO raised Grid Code modification GC0161 as an urgent joint Grid Code and Distribution Code modification to address the issue and make provisions for such customers to be protected, where technically feasible.

Subsequently NGESO has raised the joint Grid Code and Distribution Code modification GC0162 to address some issues of the timing of demand disconnection in the unlikely event that more the 20% of the total demand will need to be disconnected.

When a DNO receives an OC6 instruction from NGENSO it must begin to reduce demand in accordance with the Grid Code. This is achieved by the requirements in the Distribution Code which describe how the DNO will manage the disconnection of customer supplies.

2 The Defect

GC0162 has highlighted that the existing Distribution Code requirements currently do not envisage the exclusion from disconnection of sites which have protected status in accordance with ESEC where the amount of demand to be disconnected is in excess of 20% of total demand.

This modification proposal is to amend the Distribution Code to extend the exclusion of customers protected from demand disconnection in DOC 6.1.3, where technically feasible, for demand disconnection requirements in excess of 20% of total demand.

This modification builds on the recent modification, consulted on in DCRP/MP/23/03, to exclude protected customers from disconnection for reductions of up to 20% of total demand.

3 Proposed Solution

It is proposed to extend the provisions of DOC6.1.3 and DOC6.4.3 to exclude ESEC protected customers from demand reduction in excess of 20%, which is described in DOC6.4.5. This can be achieved by referring to DOC6.4.5 in the text in DOC6.1.3 and DOC6.4.3 which excludes ESEC sites, where technically feasible, from disconnection. The draft legal text is shown in appendix 1.

4 Applicable Code Objectives

The applicable Distribution Code Objectives are to:

- (a) permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity; and
- (b) facilitate competition in the generation and supply of electricity; and
- (c) efficiently discharge the obligations imposed upon distribution licensees by the distribution licences and comply with the Regulation and any relevant legally binding decision of the European Commission and/or the Agency for the Co-operation of Energy Regulators; and
- (d) promote efficiency in the implementation and administration of the Distribution Code.

5 Consultation Questions

1. Do you agree with the general intent of the proposed modification? If not, it would be helpful if you could explain your views.
2. Do you agree that the draft legal text set out in appendix 1 is adequate to allow DNOs to exclude ESEC protected customers, where technically feasible, from disconnection in emergencies? Please provide any comments on the drafting of appendix 1.
3. Do you believe that this proposed modification better facilitates the applicable Distribution Code Objectives?

6 Next Steps

Responses to this consultation should be sent to the Distribution Code Review Panel Secretary at dcode@energynetworks.org by 17:00 Friday 17 November 2023 on the pro-forma provided expressly for the purpose, or via any other convenient means. Responses after this date may not be considered.

The progress of this modification will depend on responses to this, and the parallel Grid Code Review Panel, consultation. The Grid Code Review Panel and the Distribution Code Review Panel will then decide on the next steps towards implementing this modification.

7. Consultation Pack Contents

A copy of the DCRP/MP/23/05 Consultation pack can be found using the link below,

<http://www.dcode.org.uk/consultations/open-consultations/>

The consultation pack includes:

- A copy of the consultation paper,
- A response proforma.

For more information, please contact:

Christopher McCann – Code Administrator - dcode@energynetworks.org

Relevant extracts from Distribution Code DOC6:

DOC6.1.3 The situation where it is necessary to reduce **Demand** due to Civil Emergencies is dealt with in **Distribution Operating Code**, DOC9.

The Electricity Supply Emergency Code issued by the lead government department for energy emergencies (as amended from time to time) provides that in certain circumstances consumers are given a certain degree of “protection” when rota disconnections are implemented pursuant to a direction under the Energy Act 1976. No such protection can be given under the **-Grid Code** or this section of the **Distribution Code** except:

- (a) In relation to **Customer Demand** reduction by disconnection initiated by the **DNO** in accordance with DOC6.1.2 (b); and
- (b) In relation to those **Demand** disconnection stages referenced in DOC6.4.3 (a), ~~and~~ DOC6.4.3 (b)(ii) ~~and~~ **DOC6.4.5**.

In which case protection may be given, where technically feasible, to pre-designated protected sites, although, even in these situations, protection cannot be guaranteed. The list of pre-designated protected sites is compiled and kept up to date by **DNOs** in accordance with the terms set out in the Electricity Supply Emergency Code.

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DOC6.4.3 The **DNO** will arrange to have available within the **DNO’s Distribution System**, four or five stages of **Demand Control**.

- (a) Where four stages are made available they shall comprise four **Demand** disconnection stages each of which can reasonably be expected to deliver between four and six percent **Demand** reduction.
- (b) Where five stages are made available they shall comprise:
 - (i) Two **Voltage Reduction** stages between two and four percent, each of which can reasonably be expected to deliver around 1.5 percent **Demand** reduction; and
 - (ii) Three **Demand** disconnection stages, each of which can reasonably be expected to deliver between four and six percent **Demand** reduction.

As stated in DOC6.1.3, protection may be given, where technically feasible, in relation to those **Demand** disconnection stages referred to in DOC6.4.3 ~~and~~ **DOC6.4.5**, although, even in these situations protection cannot be guaranteed.

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DOC6.4.5 The **DNO** will arrange to have available a scheme to implement a further four ~~5%~~ stages of **Demand Control**, each of which can reasonably be expected to deliver between 4% and 6% **Demand** reduction, upon receipt of a suitable warning from **NGESO** which will be issued by 1600 hrs on the previous day.

The **DNO** will arrange to have available a scheme to implement further twelve ~~5%~~ stages of **Demand Control**, each of which can reasonably be expected to deliver between 4% and 6% **Demand** reduction.