








Modification	At what stage is this document in the process?
<p>DCRP/MP/23/05: Modification to DOC6 to allow protection from disconnection, where technically feasible, for customers when implementing demand disconnection at levels above 20% of total demand.</p>	<div> <div>01</div> <div>Modification</div> </div> <div> <div>02</div> <div>DCRP report</div> </div> <div> <div>03</div> <div>Public Consultation</div> </div> <div> <div>04</div> <div>Final Modification Report</div> </div>
<p>The purpose of this document is to assist The Authority in its decision to implement the proposed arrangements in the Distribution Code of Licensed Distribution Network Operators of GB. To allow protection where technically feasible, for customers when implementing demand disconnection at levels above 20% of total demand.</p> <p>The proposed modifications were subject to industry consultation from 16 October 2023 to 17 November 2023.</p> <p><b>Date of publication: 04 December 2023</b></p>	
<p><b>Recommendation</b></p> <p>The Distribution Code Review Panel (DCRP) and distribution network licensees recommend that the proposed modifications are made to the Distribution Code of Licenced Distribution Network Operators of Great Britain.</p>	
	<p>The DCRP and distribution network licensees recommend that this modification should be: Submitted to The Authority for approval.</p>
	<p>High Impact:            Distribution Network Operators,</p>
	<p>Medium Impact:        Customers connected to the GB Distribution System,</p>
	<p>Low Impact:</p>

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Timetable		 020 7706 5105
Initial Report presented to DCRP		05 October 2023
Draft report issued for public consultation		16 October 2023
Consultation closed		17 November 2023
Final Modification Report available for Panel		27 November 2023
Final Modification Report submitted to The Authority		04 December 2023
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## 1 Background

Following the Government's Electricity Shortfall Prioritisation Review a number of proposed modifications to the Distribution Code and Grid Code have been identified which need to be made in parallel to ensure that Distribution Network Operators (DNOs) are fully compliant with the Grid Code when implementing an OC6 instruction from National Grid Electricity System Operator (NGESO).

This modification proposal has been developed through a joint Distribution Code and Grid Code workgroup and is proposing minor technical amendments to the legal text in the DOC6 section of the Distribution Code to align with the equivalent Grid Code (GC0162) modification.

The focus of this proposal is on demand disconnection stages above 20% of total demand and looks to provide the DNOs with increased flexibility to be able to exclude protected customers from the disconnection stages, where technically feasible to do so.

## 2 The Defect

Ofgem recently approved changes to both the Distribution Code and Grid Code for demand disconnection stages up to 20% of total demand. Following on from this change the joint workgroup was initiated to develop legal text for demand disconnection stages above 20% of total demand.

The current requirements for demand disconnection in the Distribution Code do not allow for inherent certainty in the volumes of total system demand disconnected via stages (5% of total connected demand) when implementing demand control stages. This issue was already addressed in the legal text changes implemented for demand disconnection stages up to 20% under the recent Distribution Code modification DCRP/MP/23/03. This issue remains to be resolved for demand disconnection stages above 20% which this report is proposing.

## 3 Details of the Proposal

The Distribution Code Review Panel (DCRP) and Grid Code Review Panel (GCRP) agreed to form a joint workgroup to address the current defect in the legal text and propose amendment to the DOC6 requirements of the Distribution Code, and OC6 in the Grid Code.

This modification will provide cross-code alignment when implementing demand disconnection where technically feasible above 20% of total demand.

The joint workgroup has proposed text changes to the Distribution Code and Grid Code which provide alignment of requirements across both codes, in the event of an OC6 instruction being issued by NGESO for demand reduction. The proposed text provides a relaxation in the percentage of individual blocks from the nominal five percent to a value between four and six percent.

The proposed changes to DOC6 are as follows:

- I. Amendments to DOC6.1.3(b) to provide a reference to clause DOC6.4.5 where the demand disconnection stages above 20% are set out.
- II. An additional reference to DOC6.4.5 has been included in DOC6.4.3.

- III. An amendment in DOC6.4.5 setting out a possible variance in demand control stages (ie between four and six percent of total system demand) in individual demand disconnection stages.

Proposed legal text is provided in Appendix 1 of this report.

## 4 Impacts and Other Considerations

### Impacts on Users of The Distribution Code

The proposed revision will have a positive impact on customers and DNOs by allowing where technically feasible, exclusion of protected customers from demand disconnection under DOC6 of the Distribution Code where the overall demand disconnection is above 20%.

### Impacts on Total System and the DNOs System

The impact of this modification on the total system and on DNOs' systems is broadly neutral, although DNOs may need to modify their standing approach to demand control to accommodate, the proposed flexibility to exclude where technically feasible protected customers from demand disconnection where appropriate.

### Environmental Impact Assessment

The impact on the environment as a result of this modification is neutral.

## 5 Impact on other Industry documents

This modification will have no impact on other industry documents, other than the associated Grid Code changes as described. This change relates to the requirements as set out in the Distribution Operating Code (DOC) section of the Distribution Code only.

## 6 Assessment against Distribution Code Objectives

The proposed amendments better facilitate the Distribution Code objective:

- (i) to permit the development, maintenance, and operation of an efficient, coordinated and economical system for the distribution of electricity.

*The proposal has a positive effect against this objective as the proposed amendments to the Distribution Code will permit DNOs a degree of flexibility in allocating customers to demand control stages used to maximise the efficiency of the management of the Distribution System while demand control measures are required.*

- (ii) to facilitate competition in the generation and supply of electricity.

*The proposal has a neutral effect on this objective.*

- (iii) to 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

*The proposal has a positive effect on this objective by providing alignment between the Distribution Code and Grid Code and provides the DNOs with the relevant tools to comply fully with the amended requirements in the Grid Code.*

(iv) to promote efficiency in the implementation and administration of the Distribution Code.

*The proposal has a neutral effect on this objective.*

## 7 Consultation

The public consultation for this modification proposal received no responses from industry during the consultation stage. As no responses were received, there were no objections to the proposed legal text.

## 8 Distribution Code Review Panel Discussion

Due to the condensed timeline for progressing the work in parallel with the Grid Code equivalent GC0162 modification under their 'urgency' framework the discussion for developing and submitting this report was held at the October DCRP panel meeting and offline between the ENA and a select group of DCRP representatives.

## 9 Implementation

If approved by The Authority an implementation date ten days after the agreed date of approval is proposed. This is to maintain consistency with the associated Grid Code modification proposal GC0162.

The attached version of The Distribution Code of GB included in this RTA if approved, will be the version published this version of the DCode has been allocated v5X for the purpose of this submission due to ongoing legal text with The Authority for decision.

## 10 Recommendation

The Distribution Code Review Panel and licenced Distribution Network Operators recommend that this modification report should:

- be submitted to The Authority for approval; and
- subject to the agreement of The Authority the modification should be implemented ten days from the date of approval.

## 11 Appendices

Appendix 1 – Distribution Code DOC6 section with proposed changes (in red)

Appendix 2 – Distribution Code of GB v54 TC Copy (Separate document provided)

Appendix 3 – Distribution Code of GB v5X Clean Copy (Separate document provided)

During the Joint workgroup developing the legal text changes required, a set of the affected clauses within DOC6 were agreed and consulted on. A copy of the proposed amendments to each clause has been provided below:

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.

.....

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.

.....

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**.

Appendix 2 – Distribution Code of GB v54 TC Copy (Separate document provided)

Please see separate document provided with this report.

- DCRP/MP/23/05\_DCode\_v54\_TC

### Appendix 3 – Distribution Code of GB v5X Clean Copy (Separate document provided)

Please see separate document provided with this report.

- DCRP/MP/23/05\_DCode\_v5X\_Clean