

# DCode

DCRP\_19\_01\_14

## Confirmed Minutes of the 74<sup>th</sup> Meeting of the GB Distribution Code Review Panel

7 February 2019

Meeting held at ENA commencing at 1330.

### Attendees:

Name		Company	Representing
Steve Cox	SC	ENWL	Chair
Vincent Hay	VH	ENA	Code Administrator
Alan Creighton	AMC	Northern Powergrid	DNO (observer)
Matt White	MW	UK Power Networks	DNO
Nigel Turvey	NT	Western Power Distribution	DNO
Graeme Vincent	GV	SP Energy Networks	DNO
Steve Mockford	SM	GTC	IDNO
Graham Stein	GS	National Grid	OTSO
Martin Queen (phone)	MQ	Ofgem	Authority
Awais Lodhi	AL	Centrica	Supplier
Paul Graham (phone)	PG	UK Power Reserve	BM Generator
Mark Horrocks	MH	Independent	Users
John Smart (phone)	JS	SSEN	DNO
Tim Ellingham (phone)	TE	RWE Trading GmbH	BM Generator
Guy Nicholson	GN	Stat Kraft	Non-BM Generator

### Apologies:

Bryan O'Neill	BO	Ofgem	Authority
Stew Horne	SH	Citizens Advice	Customers
Ben Vinyard	BV	Social Energy	Users
Kate Dooley	KD	Energy UK	Non-BM Generator
Gurpal Singh	GS	Ofgem	Authority
Mike Kay	MK	P2 Analysis	Consultant
Kyle Martin	KM	Energy UK	Non-BM Generator

## 1. Introductions

SC welcomed the Panel members to the meeting of the GB DCRP (the Panel). General introductions were provided and apologies were noted. VH was announced as the new DCODE Administrator, replacing Richard Wood whom had resigned in December.

## 2. Minutes of previous DCRP meeting 6 December 2018

### 2.1. Accuracy

The minutes and actions from the previous DCRP meeting held 6 December 2018 and reported in paper [DCRP\\_18\\_07\\_10](#) were confirmed as correct by the Panel. VH to publish 6 December 2018 Panel meeting minutes to DCode website.

**Action: DCode Admin (Complete)**

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## **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\\_19\\_01\\_01](#).

### **2.2.1 Open Governance**

At the December 2018 DCRP meeting, David Spillett had taken the action to discuss with the GCode Administrator on the GCRP Open Governance (OG) procedures having originally been raised by Kate Dooley that it should be introduced to the DCode. The discussion was deferred for a year to allow for the OG in the GCRP to bed in and allow DCRP to learn from any “teething” problems experienced by the GCRP. VH retained the action taken by DS to follow up with National Grid CA to see if there has been any review of OG since its introduction early 2017 and feedback at next the April 2019 meeting. Further discussion on this item was had in A.O.B. **Action: DCode Admin**

MQ was predominantly responsible for Code Governance issues whereas Peter Bingham was on the Steering Group for the Code Review announced by the Secretary of State in 2018. The Steering Group were facilitating two Energy Code Review Workshops scheduled for the 4<sup>th</sup> February and the 18<sup>th</sup> February 2019 which Mark Dunk was scheduled to attend. VH was to provide an update to the DCRP from MD on code governance changes. **Action: DCode Admin**

### **2.2.2 Panel Membership update - Elections**

VH was to figure out the election process for DCRP members as described in the Constitution and Rules of the Distribution Code Review Panel of Great Britain and to communicate the rules to members and make arrangements as necessary. **Action: DCode Admin**

### **2.2.3 DCRP Headline Report**

VH had produced a draft headline report and this had moved to a standing item for this meeting and future meeting agendas. The panel was asked to provide direction on what to circulate. This is summarised in section 13.

## **3. Grid Code Issues**

Referencing paper [DCRP\\_19\\_01\\_02](#), AMC provided the Panel with an update of the key Distribution Code/Networks related issues discussed at the most recent GCRP meeting held January 2019. The key issues were as follows:

- Changes to the GCode arising from the P28 update under GC0118 had been through consultation and was ready to be submitted to the Authority.
- Ofgem are expected to make a decision regarding GC0106 SOGL by the second week in February
- There is the possibility that 20+ RES documents will need to be reviewed at short notice by Users – including DNOs
- NGENSO will propose No-deal Brexit changes soon

Further details can be found in above paper.

Referencing paper [DCRP\\_19\\_01\\_03](#), AMC provided the Panel with an update of the key Distribution Code/Networks related issues discussed at the most recent SQSS meeting held January 2019. The key issues were as follows:

- Proposed modification to SQSS to reflect changes to P28 under proposal GSR025 had been consulted on and was ready to be submitted to the authority alongside GC0118 and DCRPMP/18/01.

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- NGET would like to see a CBA re the benefits of changing from the NGET version of the RES to the SHET versions of the RES to achieve harmonisation. This move away from the agreed NGET RES documents is likely to have more of an impact on DNOs

Further details can be found in above paper.

## **The Panel noted developments.**

### **4. EU Network Codes**

Referencing power point presentation [DCRP\\_19\\_01\\_04](#) VH provided DCRP with a brief update the latest development with regards to the GB implementation of the EU Network Codes. This included updates on;

- System Operation Guidelines. GC0106 submitted to Authority 24 December 2018. NGESO have some level of concern that Ofgem might send the G Code RTA back as SSE Generation has specifically asked for this to be done so in absence of formal legal text for WACGM 1 (ie the alternative that would force all possible data from all Type B and above Generators). If Ofgem did send back the Grid Code, they would have to do the same for the Distribution Code. MQ advised his SO colleagues dealing with WACGM. He was not aware of any issue with the submission.

All NRAs approved KORRR on 21 December unchanged from the last draft (ie with real time defined as needing a 1 minute refresh). Governance and status of KORRR post Brexit is uncertain.

- Requirement for Generators. ENA has commissioned a new type testing database for G98 and G99 compliant generation which had been broadcast to wider stakeholder mailing list. It was available for manufacturers to enter new type test data; however, there seemed to be very little uptake of the database to date. First release allows device records to be submitted and viewed but admin functions not yet fully developed. Full function release due around April.
- DER Technical Forum - The second meeting was held on 21 January. Stakeholders seem to be getting benefit from the engagement. So far over two dozen specific points have been raised on G98 and G99. The majority have been resolved and promulgated, whilst a small number do require deeper consideration by the DNOs. There is a need to find an appropriate chairman for all DER Technical Forum future meetings. DCRP members were asked to consider candidates from their organisations who may wish to chair this forum. Any respective candidate information to be forward to VH to make contact.
- Equipment Certification process was being investigated/developed by ENA. ENA had recently been in discussion with DNV GL and CertiFi through the EU NC Steering Group; however, current progress is noted as being in the hands of potential providers. DNOs note they need to start thinking about a “Plan B”, such as a DNO assessment of Manufacturer Information and the uncertainty about enduring compliance under RfG Article 41.

VH agreed to retain the action to investigate whether ENA could appoint a consultant to assess this aspect regarding manufacturers information collectively, as this should be more efficient than DNOs doing this individually. VH suggested there would need to be a funding agreement to support any such proposal. SC was to raise this at the next ENFG.

**Action: DCode Admin /SC**

- Brexit – Discussed in Section 5.

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- E&R; Appear to be no implications for DCRP – There is still concern about the implementation of E & R in the GCode as there is still a lack of clarity in the GCode and from NGET. DNOs were to raise a concern at the GCRP and that DNOs were to consider raising a Modification Proposal to require the E&R obligations to be formally documented in the GCode.

The DCRP were asked to endorse the following items:

- Note the SOGL changes to the G and D Codes is with Ofgem for approval
- Note the progress in implementing the requirements of G98 and G99
- Endorse a further 3 week consultation on the housekeeping changes to G98 and G99, following – and agree that the DNOs can progress the Report to the Authority for the modification unless anything material arises in the stakeholders' responses.

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

## **5. Modifications to the Distribution Code and the Associated Documents for a No Deal EU Exit**

VH advised the DCRP of the work ENA had commissioned Threepwood Consulting to do to prepare modifications to the DCode and DCode Annex 1 documents along with a draft FMR to prepare the DCode for a No Deal EU Exit. Gary Eastwood of Threepwood had prepared a set of papers [DCRP\\_19\\_01\\_05a](#) and [DCRP\\_19\\_01\\_05b](#) which VH presented to the DCRP which outlined the proposed work and the modifications. The full programme was shown in paper [DCRP\\_19\\_01\\_5c](#).

The DCRP considered whether consultation was required or unanimous agreement of the panel was acceptable. The DCRP agreed to proceed via the unanimous agreement route as this was more likely to meet the required timeline and the changes would not have a material effect on Users. AMC and GV agreed to update the draft text changes on behalf of the DCRP and circulate the revised version for comment. Comments were to be due by Wed 13 Feb and AMC would provide to Threepwood by Friday 15th Feb.

**Action: All & AMC (Complete)**

In line with the programme in paper [DCRP\\_19\\_01\\_5c](#) Threepwood were to circulate the final version for a final unanimous agreement before agreement to submit the RTA. The GCode were to manage their modifications through Open Governance procedures.

VH presented [DCRP\\_19\\_01\\_5d](#) to the panel which was correspondence from BEIS updating stakeholders of their preparations for a “no deal” EU Exit.

**The Panel noted the information.**

## **6. Ongoing DCode/Grid Code Modifications – Updates**

### ***6.1.DCRPMP/17/01/03 - The introduction of harmonised Applicable Qualifying Standards in 5.2 DCode to ensure compliance with the EU Connection Codes.***

DS had prepared a brief in paper [DCRP\\_19\\_01\\_12](#) for the panel to consider the review of Annex 1 and Annex 2 DCode Qualifying Standards (QS). VH was to progress the work started by DS to make sure DCode documents met the specific DCode criteria for being assigned as a QS and those that did not should be removed or reassigned ie Annex 1 to Annex 2 or Annex 2 to a Annex 1 QS. Members agreed to hold off considering the proposed changes until 7th April Meeting.

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VH will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

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

VH advised the panel that David Spillett was still progressing Storage and this sat under his remit. The GCode had completed a piece of work to apply the requirements of RfG to Energy Storage Devices under GC0096. There was now a piece of work to be completed through the DCRP Working Group to remove any exclusions to RfG for Energy Storage Devices in G99/G98 from the DCode in line with the GCode changes. The initial proposal was still being developed by the WG. DCRP members suggested it needs to be clear why the proposal is to remove the present ‘exclusions’ for Elec Storage in the DCode and G98/99. The last meeting of the WG was cancelled and had yet to be rescheduled. VH will confirm the next meeting date and provide update to the DCRP.

**Action: DCode Admin**

MK and NGET looking to influence a European discussion on storage to adopt the GC0096 approach on storage – i.e. as generation, rather than have a separate storage code.

VH will update DCRP on progress at the next meeting.

**Action: DCode Admin**

**The Panel noted progress.**

## ***6.3.DCUSA Change Proposal – De Energisation***

DS has raised this as a DCUSA issue and SC had agreed to sponsor the publication of a formal modification proposal. The issue was no longer a DCRP issue now as DCUSA had been notified and a FMR had been prepared. Clarifications were made at the previous meeting around “using authorised and safe means” with regards to Emergency De-energisation.

VH will continue to update the DCRP on progress at the next meeting.

**The Panel noted progress.**

## ***6.4.Revision of Engineering Recommendation (EREC) P2 – Security of Supply***

The panel were still awaiting an update from Ofgem regarding the approval of P2/7. Two points had been raised by Bryan O’Neil to which the DCode administrator had responded to: one relating to a tweak to the legal text of the licence change; the second, an interadministration issue, relating to the implications to DCUSA.

The DCRP had written to Ofgem regarding some alternative SCL24 legal text which would minimise the administrative impact of future changes to P2 or P2/7. The DCRP had also written to the DCUSA CA suggesting changes that may need to be made as a result of the changes to P2. VH to confirm to Ofgem that the DCRP have flagged up the possible changes to DCUSA.

As part of the work to revise EREP 130, the P2 Working Group had considered changes to P2 definitions but ultimately decided against amending these terms. The EREP 130 WG had held discussions with the P2 WG on this possible change. No further revisions or amendments of P2/7 were planned.

EREP130 consultation – see section 7.3.

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Work has started with the P2 WG on the 3<sup>rd</sup> phase of work which was to reengage stakeholders on a possible change to the fundamental standard for security of supply (Table 1). The plan at this stage was to develop stakeholder presentation material for the end of March and run this past the DCRP at the April meeting for approval to go to Stakeholders. A public workshop was expected to be held after Easter. SC, Goran Strbac (Imperial College London), and AMC to try and clarify the position and develop a storyboard for the ITCG / DCRP and the P2/8 WG reps.

**Action: SC & AMC**

VH will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

## ***6.5.DCRPMP18/01 - EREC P28 (GC0118) – Update***

National Grid have confirmed that GCode modification GC0118 and SQSS Modification GSR025 relating to P28 are ready to submit to Ofgem having been through public consultation. The DCRP agreed for the original DCRP RTA submitted in May 2018 to be resent at the same time subject to the DCode Administrator reviewing the original RTA to check that the dates, DCode version numbers etc are still correct.

VH will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

## **7. DCRP Consultations- Approval of Panel to proceed.**

### ***7.1.DCRP/19/01/PC - EREC G98 & G99 – Minor Corrections and Housekeeping Modifications***

The Panel agreed to allowing the submission ([DCRP\\_19\\_01\\_06](#)) to proceed to Public Consultation (PC) provided there was a change in the title to reflect that there had been some minor technical modifications as well as editorial changes which were applicable to both G59/G83 as well as G98/G99. The main reason was to more accurately flag to stakeholders the content of the modifications. The title was to be changed to G59/G83 and G98/G99 Minor Technical Modifications and Editorial Corrections.

VH to circulate submission for PC and update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

### ***7.2.DCRP/19/02/PC - EREC G5/5***

AMC expressed concern that the comments on 22 January haven't been incorporated into the final document. GV had also identified errors in the WG report e.g. that the review was a DCRP review not a joint DCRP / GCRP review. AMC and GV were to send WG lead comments for inclusion in the consultation document.

**Action: AMC & GV (Complete)**

The DCRP agreed to proceed to consultation once the consultation paper ([DCRP\\_19\\_01\\_07](#)) had been reviewed and errors corrected, along with the condition that the Working Group facilitates two stakeholder dissemination events (London and Glasgow) to explain the changes made to the document to Users in

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advance of the consultation closure. The dissemination events should allow Stakeholders to ask questions about the new document and understand the impact of the changes. VH advised ENA are happy to facilitate the Stakeholder events but required the Working Group to present to the Stakeholders.

The primary reasons for the DCRP requiring stakeholder engagement was the significance of the changes which had been made to the document and that they had taken 10 years to develop. Many companies already had long established workarounds in place which Users of the DCode may therefore need to be reeducated in the new standard to ensure Users are aware of the new requirements. The DCRP agreed for effective stakeholder engagement, this consultation would therefore require face-to-face meetings with stakeholders. Indications from the DCRP were the audience size would likely be up to 50 or more stakeholders were potentially going to be interested in attending so it would seem sensible to extend the invite to at least 50 stakeholders. VH agreed to arrange Stakeholder events with the Working Group.

**Action: DCode Admin**

The DCRP were clear the GCode would need to run their own consultation process for the Grid Code modification.

VH will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

### ***7.3.DCRP/19/03/PC - EREP 130***

The EREP 130 WG had completed the drafting of EREP 130 Issue 3 and this had been overseen by the P2 WG. One of the main items Ofgem had requested was to remove the need for derogations to P2/7 which members had addressed through EREP 130 Issue 3. There was some remaining concern about generator ride-through capability but by in large members were happy with the completed document. EREP 130 Issue 3 was ready to proceed through public consultation. To support the public consultation, the ICL F Factor Review Report was included in the consultation pack ([DCRP\\_19\\_01\\_08](#)) which summarised the F Factor revision analysis. The DCRP agreed for the submission to proceed to consultation.

VH will continue to update DCRP on progress at the next meeting.

**Action: DCode Admin**

**Panel noted progress.**

## **8. Ongoing DCRP Consultations – Update**

### ***8.1.National Grid Separation – DCRP/18/10/PC***

DCRP approved to proceed with the RTA subject to confirmation of the NGET legal entity names, versioning of the DCode and Constitution and Rules, clarification of the governance arrangement, and a tidy up the Consultation pack ([DCRP\\_19\\_01\\_09](#)).

### ***8.2.DCRP/GC0106 – Implementation of the EU Network Codes System Operation Guidelines***

GC0106 submitted to Authority 24 December 2018. DCode Administrator had received questions from Ofgem to clarify the changes to the DCode. VH to follow up with Jordan Clark of Ofgem the questions as they did seem to be covered off in the RTA which included change tracked legal text.

**Action: DCode Admin**

### ***8.3.DCRP/18/08/PC - DC0079 - Frequency Changes during Large Disturbances and their Impact on the Total System***

National Grid had prepared a draft Report to Authority along with the Implementation Plan, DCode, and G59 amendment appendices which were to be included with RTA to support the modification proposal. The DCRP approved the submission of the RTA ([DCRP\\_19\\_01\\_10](#)) subject to some minor technical and editorial changes to the RTA and the associated appendices before submitting the RTA for approval. Detailed discussion points were summarised in section 9.1.

### **9. Joint GCRP/DCRP DC0079 Workgroup Frequency Changes during Large Disturbances - Update**

**Panel Members noted >5MW RoCoF Setting changes complete.**

#### ***9.1.Phase 2 < 5 MW RoCoF Setting changes - Update***

GS provided the Panel with a progress update on the proposals to apply retrospective RoCoF changes to all remaining existing non type tested embedded generating plant <5MW commissioned before 1 February 2018.

- DC0079 Consultation process was complete and draft RTA had been prepared
- Implementation plan development complete and to be included in RTA. The implementation plan included a value assessment model which had been developed to provide metrics for the performance of the programme and confirm continuing the programme would deliver value.
- Engagement and payment plan is being finalised.
- The implementation plan built in two levels of assurance checks to confirm the retrospective elements had been completed; 1. DNOs will check x number of sites through witness testing; 2. Independent witness testing for a fixed percentage of sites. Volume of checking could flex in response to performance.

Panel members noted a typo in the legal text with amendment required to paragraph 2:10. GS to take an action to redraft clause 2:10. MW and AMC to pass other editorial corrections to GS and VH for inclusion in the FMR.

**Action: AMC, GS, DCode Admin**

DNOs are compelled by their licence obligation to enforce but there was ongoing questions of timing and when this was required. Good practice guide sent in May on backstop.

#### **Panel noted progress.**

The have been some concerns expressed by ETG with regards to the settings changes:

- ETG are concerned that the increase in DG and storage means that the LFDD relays will inadvertently disconnect DG and make the situation worse. The action was for was for NGET to provide clarity on the next step. **Aside:** Innovation project by SPEN with SO looking at Blackstart using DG.
- The issue regarding OC6 disconnection of generation at the request of NGET was again raised as a general issue. The concern from ETG seems to be that i) the DNO might be considered to be commercially liable for ‘inappropriately’ implementing an instruction from NGET and ii). DNO control room staff may be concerned about the consequences of ‘not implementing’ an instruction from NGET control. The panel discussed DNOs will be OK to implement generation disconnection instructions if codified in the GCode. SC suggested this could be formally raised on the GCRP Agenda. The action was for was for NGET to provide clarity on the next step.



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- BEIS have specifically asked whether the DC0079 protection settings been considered in the context of using DG as a means of providing Black Start. Action for NGET to confirm. GS to advise if new settings are compatible with NGs Blackstart points.

**Action: GS**

It was suggested but not confirmed National Grid under CUSC can instruct DNO to disconnect anything under a rapidly falling frequency event but National Grid take full liability of instruction.

## **10. DCode Qualifying Standards Review**

Referencing paper [DCRP\\_19\\_01\\_11](#) VH provided panel members with a progress update.

**Panel members noted progress.**

Referencing paper [DCRP\\_19\\_01\\_12](#) VH provided panel members with a progress update. DS had reviewed Annex 1 & 2 Qualifying Standards as requested by Ofgem, which was triggered by the revision to P25 and P26 which are (potentially and inappropriately) Annex 1 documents.

DS reviewed the documents based on the Dcode definition of Annex 1 & Annex 2 (applicability to users as set out in the definition of an Annex 1 Standard); however, applying this criteria, the results largely appear to endorse a 'no change' scenario – but this isn't what Ofgem had in mind.

DS previously had the initial view that some Annex 1 standards would be demoted to Annex 2 status and a couple would possibly be promoted e.g. EREP130. The DCRP agreed EREP 130 was to become an Annex 1 document from Annex 2 as well as endorsing a review of the allocation of all documents.

The panel agreed the recommendation rationale of DCode Annex 1/Annex 2 document changes needed to be clarified in order for the panel to make a decision at the next DCRP meeting in April. VH to request the change rationale from David Spillett.

**Action: DCode Admin**

EREC P18 housekeeping modifications had been circulated for approval. MW raised whether the document had been expanded to include 33kV circuits as had been discussed in 2018. VH suggested a new WG was to be established in 2019 to carry out a wider review of ER P18. At this stage the document was not on the formal review programme for 2019.

VH confirmed there were no DCode documents formally included in the 2019 work plan. P29 was set up to progress through an ENA/DCRP Working Group.

## **11. Code Administration Update**

### ***11.1. CACoP meeting***

Mark Dunk had recently attended the CACoP meeting in London. There were no significant updates for the panel to note.

**Panel noted review.**

### ***11.2. Panel Membership update***

The panel noted that non-DNO/IDNO DCRP Membership elections are due for 2019 and would make representations for membership ASAP. VH was to clarify how the election process was to work.

## **12. DCRP Headline report**

VH to develop and publish a short Headline Report from DCRP meetings that can be shared with other Code Administrators. Members suggested the content for inclusion in the headline report should summarise:

- Approved for Consultation
- Approved for Report to Authority
- Items though to be of interest to other codes

## **13. AOB**

MQ raised the Open Governance of the DCode which had been raised earlier in 2.2.2 and requested the DCRP looked at potentially adopting this. MQ suggested the panel could look to adopt an open governance (or partial open governance) approach for minor modifications which could alleviate the burden on Ofgem approving minor changes or “housekeeping” type modifications. VH had taken the action to discuss with the GCode Administrator already so suggested this would be picked up. VH to confirm the change process and report back to the panel.

**Action: DCode Admin**

SC expressed the view that the customer satisfaction of DCRP was the highest of all panels, and its unclear what the defect with the current governance procedure is. GN raised the GCRP OG procedure as needing amended before DCRP should consider adopting their approach as it was not working as it should.

Panel members noted there may be change implications which arise in future from the Ofgem and BEIS Code Administration review so they would consider any changes with this in mind. Any changes to the governance should take into account the DCode stakeholders may be impacted.

**Panel noted information.**

## **14. Date of next meeting**

- Thursday 11 April 2019 at ENA commencing at 1330.

## **15. Meeting Dates for 2019**

Thursday 6 June

Thursday 8 August

Thursday 10 October

Thursday 12 December

All meetings to be held at ENA London.