

Distribution Code Consultation Response Proforma

DCRP/18/03/PC: Engineering Recommendation P2

Security of Supply

Stakeholders are invited to respond to this consultation, expressing their views or providing any further evidence on any of the matters contained within the consultation document. Stakeholders are invited to supply the rationale for their responses to the set questions.

Please send your responses and comments by **17:00 on 12th February 2018** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/18/03/PC EREC P2'. Please note that any responses received after the deadline may not receive due consideration by the Working Group.

Any queries on the content of the consultation pro-forma should be addressed to DCode Administrator on 020 7706 5124, or to dcode@energynetworks.org

Respondent	<i>Mark Horrocks</i>
Company Name	McLellan and Partners Ltd
No. of DCode Stakeholders Represented	Users and as a consumer
Stakeholders represented	<i>Large industrial load consumers such as steel plants, factories and large classified sites</i>
Role of Respondent	Consultant – Large Industrial Loads, and as a residential customer
We intend to publish the consultation responses on the DCode website. Do you agree to this response being published on the DCode website? [Y/N]	No

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	Question	Response
Q1	Do you agree that the proposed amendments achieve the Distribution Code Objectives?	Y
Q2	Do you agree with the proposed text contained in the draft EREC P2, or do you have any alternatives to propose or indeed any comments relating to the specific technical content of the EREC?	Y

Please provide comments relating to the specific technical content of the EREC¹

Page No	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
2	2	2	G	Should you not provide ENA ER 130 and 131 in order to allow proper commenting on the document as this allows a full holistic view on the reliability of the network.		The next phase is to review EREC 130 based on the proposed changes to P2. This work has commenced and we intend to issue a separate consultation later this year. This phased approach has been agreed with industry stakeholders.
6	3.9		G	DNO and Network operator being used interchangeably – recommend using one term for consistency. Also recommend all terms like latent demand in 3.10 and 3.11 should come before 3.9 to allow fluid reading		Network Operator is defined as DNO or TSO for the purposes of its use in the definition of Group Demand “the effect of Network Operator price signals”. Whilst P2 does not apply to TSO, DNOs should take into consideration DSO and TSO price signals when considering Group demand. Noted – however the definitions should remain in alphabetical order for ease of reference.

¹ Add more rows if required

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7	3.12		G	This should be DNO or DSO. P2/7 does not apply to a TSO as this relates to D-Code and Distribution networks		Please see above response.
8	4		G	For a Class E whereby a departure from the “normal” figures are set out, should there not be a public consultation of all those affected, as a consumer, I think one would find it quite concerning if I was off electricity for a long period of time due to an incorrectly conceived scheme. For industry this would be very detrimental.		There has been no change to the current requirements which requires supply to be restored in no more than 60 seconds where there is significant economies. The expectation is that the requirements of table 1 will be reviewed in a subsequent phase and there will be appropriate consultation as part of any future changes.
8	5	Point 3	G	What facility is there for DG to be producing in island on a Distributed network to support an outage as I believe this was one of the scenarios discussed at one of the public consultations. If it is with a weak interconnection elsewhere in the network then what is the impact if the generator was to fail? What contingencies would be in place?		P2 doesn't exclude accounting for security contribution from DG operating in island mode or when connected via weak interconnection. However, the DNO needs to take into consideration the performance of the generator in that scenario when assessing the security contribution. We expect further guidance to be provided in EREP 130.
8	5	Last para	T	Should you not included Frequency as well as Voltage to BS EN 50160?		The System Operator is responsible for frequency.

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9	5.3	Final sentence	T	Should include DSR as this could be called upon outside of a “peak” and due to operational aspects may not be available. So DNOs should consider DSR will not always be manageable via an ANM scheme. Whom does DSR apply to?? Industrial? Commercial or Residential? Can DNO’s install Storage to give better network management or is this anti-competitive? No Wires T&D should be considered. Storage was called upon during the Puerto Rico hurricane, so it should be considered here, as lowering demand would help in a time of crisis.		Agreed – change sentence to: “DNOs should not assume all generation or DSR can or will be manageable via an ANM scheme”. DNOs can install and own storage but only under very specific conditions as per EU legislation.
9	5.3		G	What is the impact of all this complexity with the layers of running of ANM, control and protection systems to the susceptibility of failure by various means?		The complexity risk and confidence in the whole system solution is a key consideration for EREP 130 which will provide guidance on this important topic.
9	5.4		G	Is there agreement from the generator to be under this category or will this be enforced upon a generator or user???		P2 is a demand planning standard, Phase 1 demonstrated conclusively that there is no justification for a DG planning standard. DG operators are able to purchase whatever level of security they require from their DNO.
10	General		G	Can we categorise Battery storage as this can be useful for customers and DNOs a like to do various functions such as digital inertia or provision of power over a sustained period in the event of an outage		Storage is a generic term and covers all technology types a number of which have differing operational characteristics.