

Modification proposal:	Distribution Code: DCRP/MP/19/01 – G98/G99 and G59/G83 Minor Technical Modifications and Editorial Corrections		
Decision:	The Authority ¹ has decided to approve ² this modification		
Target audience:	Distribution licensees, Distribution Code Review Panel, distribution network users and other interested parties		
Date of publication:	6 June 2019	Implementation date:	16 June 2019

Background

Distribution Code modification GC0102/DCRP 'Implementation of the EU Network Code – Requirement for Generators'³ was approved by us on 15 May 2018. This modification ensures that the GB Distribution Code is consistent with the relevant European Network Code (Requirement for Generators (RfG))⁴. This was achieved primarily by the creation of two new Annex 1 documents, G98⁵ and G99⁶.

As stakeholders began to apply G98 and G99 in advance of it coming into force on 27 April 2019, a number of minor technical and housekeeping issues came to light. Some small consequential changes to the requirements outlined in G59⁶ and G83⁵ were also identified.

The modification proposal

DCRP/MP/19/01 resolves minor inconsistencies that have been carried through to G98 and G99 from G59 and G83 and some minor typographical errors.

This modification proposal addresses issues in G98/G99 and G59/G83 across three areas:

- changes with definite implications for some stakeholders;
- minor defects in original drafting; and
- minor typographical errors etc.

Details of the specific proposed changes to G98/G99 and G59/G83 can be found in the Final Modification Report (FMR) submitted by the Distribution Code Review Panel (DCRP) on 12 April 2019.⁷ These proposed changes clarify requirements carried over from G59/G83 to G98/G99 and corrects a number of minor defects and typographical errors found in labelling and internal references in G98 and G99.

This modification proposal was subject to a consultation between 26 October and 23 November 2018. Seven responses to that consultation were received. As a result of feedback from stakeholders, further changes were proposed. These additional points

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 <https://www.ofgem.gov.uk/publications-and-updates/distribution-code-gc0102dcrp-implementation-eu-network-code-requirement-generators>

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0631>

⁵ <http://www.energynetworks.org/electricity/engineering/distributed-generation/engineering-recommendation-g83.html>

⁶ <http://www.energynetworks.org/electricity/engineering/distributed-generation/engineering-recommendation-g59.html>

⁷ Distribution Code proposals, final reports and representations can be viewed at:

<http://www.dcode.org.uk/areas-of-work/> and <http://www.dcode.org.uk/consultations/>

were further consulted on between 08 February and 01 March 2019. The four responses received to the second consultation were broadly supportive of the modification.

Distribution Code Review Panel (DCRP)⁸ comments and licensee recommendation

At the DCRP meeting on 11 April 2019, the Panel agreed that the changes should be submitted to the Authority for approval. The DCRP consider that objectives (a), (b), and (c) are better facilitated by the modification and that it has a neutral impact on objective (d). This modification was also recommended for approval by the DNOs.

Our decision

We have considered the issues raised by the modification proposal and taken account of the FMR dated 12 April 2019. We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the applicable objectives of the Distribution Code,⁹ and
- approving the modification is consistent with our principal objective and statutory duties.¹⁰

Reasons for our decision

We consider this modification proposal will better facilitate Distribution Code objectives (a), (b), (c) and (d). We differ slightly from the DCRP, which consider the modification to have a neutral impact on objective (d). Our reasoning for this is below.

(a) permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity.

The proposed changes to G99/G98 and G59/G83 reduce uncertainty and ambiguity in the Distribution Code by aligning and clarifying requirements so all stakeholders are subject to fair and transparent standards.

Aligning type tested and non-type tested interface protection requirements will avoid confusion by making stability tests for all sizes of PGMs identical. Future-proofing these requirements creates robust standards that contribute to a more economic and efficient distribution system.

(b) to facilitate competition in the generation and supply of electricity

Additional text and clarifications added to G99 makes the requirements and timings easier for new generation to demonstrate compliance.

Prior to this modification, stakeholders were concerned about the significant time for generating units to commission. Changes to G99 clarify the types of PGMs that require a FON for permanent operation and sets a maximum time between commissioning and FON

⁸ The DCRP is established in accordance with SLC 21 of the Electricity Distribution Licence.

⁹ As set out in Standard Condition SLC 21.4 of the Electricity Distribution Licence available at: <https://epr.ofgem.gov.uk//Content/Documents/Electricity%20Distribution%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current%20Version.pdf>

¹⁰ 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.

receipt. This is intended to expedite the provision of all necessary compliance documentation prior to the issue of a FON.

(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

The creation of G98 and G99 was as a result of transposing the requirements from the RfG into the GB Distribution Code. In the process of carrying this out a number of errors were embedded in the initial documentation. This modification corrects these errors and ensures consistency between the RfG and the GB Distribution Code.

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

This modification proposal clarifies several requirements and corrects minor defects and typographical errors throughout G98 and G99. Consequentially, this makes the Distribution Code easier for stakeholders to implement and administer.

Decision notice

In accordance with SLC 21.11 of the Electricity Distribution Licence, the Authority hereby directs that the modification to the Distribution Code set out in the Final Modification Report to the Authority of 12 April 2019 be made.

Martin Queen
Principal Engineer

Signed on behalf of the Authority and authorised for that purpose