

Distribution Code Consultation Response Proforma

DCRP/21/05/PC: Distribution Code Compliance – EDF RESPONSE 07 October 2021

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, 7th October 2021** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/21/05/PC Distribution Code Compliance. 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 5105, or to dcode@energynetworks.org

Respondent	Andy Vaudin
Company Name	EDF
No. of DCode Stakeholders Represented	1
Stakeholders represented	Generation, Supply
Role of Respondent	Grid Policy Manager

Distribution Code Consultation Response Proforma

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]	Y
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	Question	Response	Secretariate Response
Q1	Do you agree with the general intent of the proposed modification? If not, please explain your views.	We agree with the intent of the proposed modifications to the Distribution Code to formalise the enforcement process DNOs would apply to customers, including generators, where there is a concern that they do not, or might not, comply with the requirements set out in the Distribution Code. Distribution Code compliance is an important element of electrical system security, resilience and operability.	Thank you for your agreement on the intent of this modification proposal.
Q2	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Agreed that the proposed modifications satisfy the applicable Distribution Code Objectives to: (a) permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity; (b) facilitate competition in the generation and supply of electricity; (c) efficiently discharge the obligations imposed upon distribution licensees by the	Noted, thank you.

Distribution Code Consultation Response Proforma

	Question	Response	Secretariate Response
		<p>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</p> <p>(d) promote efficiency in the implementation and administration of the Distribution Code.</p>	
Q3	Do you agree with the process and the timeline associated with it? If not, please explain your concerns.	It is not clear that the process will be paused following the submission of a derogation application to Ofgem up until a decision is made.	This may require some additional drafting to the documentation to provide clarity in the event a derogation is submitted to Ofgem.
Q4	The implementation date of the Process described is 1st September 2022 and will coincide with the closure of the Accelerated Loss of Mains Change Programme on 31st August 2022. Do you agree with the proposed implementation date of the Process? If not, please explain why.	We agree with an implementation date of 1 September 2022 linked to the closure of the ALoMCP on 31 August 2022.	Thank you for your view.
Q5	Do you have any comments on the proposed legal text drafting?	See response to Q3. It is not clear in the DGC12.5 legal text that the process will be paused following the submission of a derogation application to Ofgem until a decision is made.	the legal text will be assessed and amended if required to meet the situation of a user submitting a derogation to Ofgem for decision.

Distribution Code Consultation Response Proforma

	Question	Response	Secretariate Response
Q6	Do you have any other comments?	None	Thank you.

Distribution Code Consultation Response Proforma

Please provide comments relating to the specific technical content of the proposed modifications¹

Page / line No	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
						See comments above.

¹ Add more rows if required