

Unconfirmed Minutes of the 69th Meeting of the GB Distribution Code Review Panel

5th April 2018

Meeting held at ENA commencing at 1330.

Attendees:

| Name | | Company | Representing |
|----------------|-----|----------------------------|--------------------|
| David Spillett | DS | ENA | Code Administrator |
| Graeme Vincent | GV | SP Energy Networks | DNO |
| Graham Stein | GS | National Grid | OTSO |
| John Smart | JS | SSEN | DNO |
| Martin Queen | MQ | Ofgem | Authority |
| Nigel Turvey | NT | Western Power Distribution | DNO |
| Alan Creighton | AMC | Northern Powergrid | DNO (observer) |
| Paul Graham | PG | UK Power Reserve | BM Generator |
| Steve Mockford | SM | GTC | IDNO |
| Mark Horrocks | MH | McIlleland | Users |
| Matt White | MW | UK Power Networks | DNO |
| Mike Kay | MK | Consultant | ENA |

Apologies:

| | | | |
|-----------------------|----|------------------------|------------------|
| Stew Horne | SH | Citizens Advice | Customers |
| Steve Cox | SC | Electricity North West | Chairman |
| Sotiris Georgiopoulos | SG | UK Power Networks | DNO |
| Ben Vinyard | BV | Segen | Users |
| Guy Nicholson | GN | Element Power | Non-BM Generator |
| Kyle Martin | KM | Energy UK | Non-BM Generator |
| Tim Ellingham | TE | RWE Trading GmbH | BM Generator |
| Awais Lodhi | AL | Centrica | Supplier |

1. Introductions

In the absence of SC, DS welcomed the Panel members to the meeting of the GB DCRP (the Panel). General introductions were provided and apologies were noted.

2. Minutes of previous DCRP meeting 8 February 2018

2.1 Accuracy

With the exception of some minor editorial changes the minutes and actions from the previous DCRP meeting held 8th February 2018 and reported in paper [DCRP_18_02_07](#) were confirmed as correct by the Panel. DS to publish 8th February 2018 Panel meeting minutes to DCode website.

Action: DS

2.2 Matters Arrising

With the exception of the issues below all other actions from the previous meeting were either completed or included on the agenda [DCRP_18_03_01](#).

National Terms of Connection - Section – Emergency De-energisation

DS informed the Panel that he has raised this matter with the DCUSA Code Administrator and will aim to present this issue at the next DCUSA Panel meeting. The DNOs agreed to take an action to see what the local arrangements are for emergency de-energisation and this information will be required in advance of attending the DCUSA Panel meeting.

Action: DS/DNOs

Open Governance

At the October 2017 Panel meeting KD raised the matter of Open Governance (OG) being introduced to the DCode. In the minutes of the June Panel meeting it was recorded that the issue would be revisited in December following a period of time to allow OG in the GCRP to bed in and allow DCRP to learn from any “teething” problems experienced by the GCRP. DS suggested that this issue would be revisited at the next meeting of the DCRP. DS to follow up with National Grid CA to see if there has been any review of OG since its introduction early 2017.

Action: DS

3. Grid Code Issues

Referencing papers [DCRP_18_03_02](#) and [02a](#) AMC provided the Panel with a brief update of the key Distribution Code related issues discussed at the recent GCRP meetings held on 22 Feb and 21 March to. The key issues were as follows.

- EU Emergency & Restoration Code. There will be a review of the mapping exercise open to stakeholders. Hopefully there should be something similar for SOGL.
- Some guiding principles developed and applied to assess the prioritisation of the anticipated increase in GCRP work.
- The timeline to complete the GC0104 DCC Modification Proposal is challenging.
- The 5 RES documents that have been discussed during 2017 have been recirculated for a final 20 day consultation period. AMC to review.
- EU RfG implementation. GC100,101 and 102 have been sent to Ofgem. A decision is expected in April.
- EU DCC implementation. WG consultation is due early April
- Ofgem gave a presentation on the Regulatory ‘Sandbox’

Further details can be found in the above DCRP papers.

Panel noted developments.

4. EU Network Codes

Referencing power point presentation [DCRP_18_03_03](#) MK provided the Panel with the latest updates and development with regards to the GB implementation of the EU Network Codes. Following the presentation and brief discussions the Panel was invited to note and endorse the following:

- The initiation of joint working on modifications for LFSM-O and FFCI with the GCRP;
- The progress on the GC0104 consultation; and
- A future GC0106 consultation on the need to modify G83 and G98 to collect more detailed energy source information.

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

5. New DCode/Grid Code Modifications

5.1 GC - LFSM-O compliance requirements for Type B PGMs

Referencing paper [DCRP_18_03_04](#) MK provided the Panel with an overview of the modification proposal which aims to update the Grid Code and ERG99 with revised text for limited frequency sensitive mode-overfrequency compliance so that manufacturers have clear pass/fail criteria for limited frequency sensitive mode-overfrequency compliance. This will be delivered by a Joint Grid and Distribution WG. A similar proposal will be submitted to the GCRP on 25/4.

The Panel noted and agreed to the proposed modification proposal.

5.2 GC - Fast Fault Current Injection RFG compliance requirements

Referencing paper [DCRP_18_03_04a](#) MK provided the Panel with an overview of the modification proposal which aims to update the Grid Code and ERG99 with revised text for fast fault current injection to dispel any confusion in interpretation of the existing text. This will be delivered by a Joint Grid and Distribution WG. A similar proposal will be submitted to the GCRP on 25/4.

The Panel noted developments and subject to any final comments from members agreed to the two proposed modification proposals.

6. Ongoing DCode/Grid Code Modifications

6.1 DCRPMP/17/0103 - The introduction of harmonised Applicable Qualifying Standards in DCode to ensure compliance with the EU Connection Codes.

DS provided a brief update to the Panel on the latest progress of reviewing the relevant DCode Qualifying Standards. Out of the 18 Annex 1 & 2 documents approximately seven documents will need to be reviewed to ensure the requirements do not exceed the requirements set out in the UE Network Codes. Several of these seven documents are already under a revision process and the WGs have been asked to include in their scope of work and TOR to include the requirement to review the documents to ensure where appropriate they are consistent with the EU Codes and are not setting more stringent requirements.

DS will update the Panel on progress at the next meeting.

Action: DS

Panel noted progress to date.

6.1 DCRPMP/17/05 - Provision for Energy Storage Devices in the Distribution Code.

DS provided the Panel with a brief update on progress of this DCRP WG. The first preliminary WG meeting was held on 28 March. The purpose of this meeting was to ensure that all DNOs were in a consistent position in relation to the connection of storage. Other issues covered during that meeting included:

- Review of WG TOR
- Review of GC 0096 Modification draft report
- Storage and work of Open Networks
- Potential amendment to Electricity Act to reference storage
- Discussion on the new G98 and G99 and storage
- Develop WG webpage on DCode website

Next meeting with all WG stakeholders is scheduled 2 May at ENA.

Panel noted progress.

7. DCRP Reports to Authority – DCRP agreement to submit reports

7.1 DC0079 (submitted 27/03/18)

Referencing Report to Authority (RtA) paper [DCRP_18_03_05](#) DS reminded the Panel that this specific RtA (in draft) had been previously circulated to the Panel for approval prior to final submission to Ofgem. As the next scheduled meeting of the DCRP was not until 5 April and the need to meet 1 July implementation date the Code Administrator sought agreement from the Panel by circulating a formal request via email. This email request was sent out to the Panel on 14 March with a return date of 21 March for any objections. Subsequently there were no objections and as such the Panel agreed that the changes contained in modification report should be recommended by the DNOs to the Authority. The RtA was submitted to the Authority on 28 March.

Panel noted progress

7.2 EREC P28

Referencing paper [DCRP_18_03_05a](#) DS provided a brief overview of the draft P28 Report to Authority (RtA). Following a short discussion it was identified that there were a small number of issues that needed to be addressed before submission to the Authority. DS agreed to go back to the chair of the WG and request that the issues be addressed and once this has been completed a revised version of the RtA will be submitted to the Panel for agreement to submit to the Authority. DS will issue final revised version of the RtA to the Panel as soon as it is available.

Action: DS

7.3 EREC P2/7

Referencing paper [DCRP_18_03_05b](#) DS provided a brief overview of progress on the revision to ER P2. The paper which was a draft Report to Authority (RtA) that had been circulated for final comment was now slightly out of date and it was agreed that DS would share with the Panel the revised final draft ER P2/7 once finalised.

Action: DS

8. Joint GCRP/DCRP DC0079 Workgroup Frequency Changes during Large Disturbances Update

8.1 Phase 1 - >5MW RoCoF Setting changes update

Referencing paper DS provided the Panel members with the latest progress of implementing the changes to the protection settings for >5MW Power Stations. No change since the last meeting in January. There still remains only one site (52MW) within SPEN area that requires to complete the changes. It is expected that this final site should be completed in May 2018.

>5MW Power Stations – All Connections

| | Total MW | MW of changed settings | MW not applicable | MW WiP |
|----------|---------------------|------------------------|-------------------|-------------|
| ENW | 486.31 (507.1) | 272.56 (106.0) | 213.75 (153.8) | 0 |
| NPg | 2460.4 (2469.4) | 387.0 (371.2) | 2073.4 (1978.9) | 0 |
| SPEN | 1903.18 (1903.18) | 1313.15 (1296.15) | 513.03 (513.03) | 35.0 (52.0) |
| SSEPD | 2143.99 (2134.3) | 1001.35 (338.7) | 1142.64 (816.0) | 0 |
| UKPN | 1482.02 (1482.02) | 853.26 (829.46) | 628.81 (628.81) | 0 |
| WPD | 2431.87 (2582.0) | 1141.54 (635.0) | 1290.33 (1166.7) | 0 |
| 31/03/18 | 10907.77 (10916.77) | 4968.86 (4951.86) | 5861.96 (5767.36) | 35.0 (52.0) |

8.2 Phase 2 < 5 MW RoCoF Setting changes - Update

8.2.1 DC0079 Retrospective Application to remaning plant <50MW and revised DCode – Consultation

Referencing papers [DCRP_18_03_06a](#) and [DCRP_18_03_06b](#) GS provided the Panel with a progress update in particular on the proposals to apply retrospective RoCoF changes to all remaning existing embedded generating plant <50MW commissioned before 1 February 2018. Paper [DCRP_18_03_06a](#) presents draft proposals by the WG to modify the Distribution Code and Engineering Recommendations G59 for Industry Consultation.

National Grid CBA sets out a estimated costs = £31 Million implementation cost v £40 Million benefit cost saving per annum. Cateregories of generation that this proposal applies to includes:

- All Genertaion plant that is embedded below 50MW in England & Wales
- Smaller than medium PS in Scotland
- Does not include domestic scale below 50kW
- >5MW programme will need to be revisited

There were some comments relating to the paper suggesting

- that it should reference the 700MW accelerated programme in the South of England ... need to ensure consistency narrative aligns etc one clear message. May need to rethink of what message goes to the 700MW generators so we don't set back the RoCoF programme.
- should there be some reference to the funding requirements as set out in paper DCRP_18_03_06c or set out seperately.
- setting out future compliance issues,

- reference to both synchronous and non synchronous generation is required to make sure it covers everything
- Some concerns with the draft (depending on how wide the programme is implemented) is that we do not end up in 2021 with some customers who end up being non compliant with G59 and we don't end up in the situation we were in with the >5MW change programme. Can G59 be written in a way that avoids this?
- Clean and tracked change version of G59 is required when issuing consultation pack
- Can't submit a report to authority if no funding arrangements and implementation plan available. Ofgem looking for one complete RTA package.
- Need to firm up funding requirements and implementation plan
- Is 100% RoCoF compliance required or would 90% suffice? Maximum benefit for minimum cost!
- Some of the details contained in paper DCRP_18_03_06c should be included in the consultation paper
- How far down the network does this work go ...down to LV?
- Include elements of DCRP_18_03_06c in the consultation papers as an appendix so it provides clarity as to who would be involved in any implementation.

It was suggested that the Panel would need some time to review and respond to the draft consultation paper. It was therefore agreed that comments from Panel Members would be submitted to DS by COB Monday 16 April

Action: All Panel Members

8.2.2 Retrospective Change Implementation and Funding

Referencing paper [DCRP_18_03_06c](#) GS summarised a proposal to set up a multi-workstream programme, consisting of 4 workstreams reporting to a Steering Committee which is responsible for delivery of the retrospective change implementation programme. The Steering Committee will report to the Distribution Code Review Panel.

Authority approvals for previous DC0079 and associated workgroup recommendations made clear statements that a robust implementation plan needed to be in place in order for approval to be granted to any subsequent retrospective change. Paper [DCRP_18_03_06c](#) outlines a proposal for these to be taken forward under DCRP lead with appropriate stakeholder input to programme decisions.

Observations from the Panel suggested that setting up this programme would need some significant resources from Stakeholders to deliver this in particular Network Operators.

The Distribution Code Review Panel were invited to:

- Comment on and agree the outline proposal;
- Agree and refine the roles and responsibilities of the Customer Support Workstream;
- Agree next steps to define timeline, resource and costs estimates.

In principle the Panel saw the merits of the proposals and the urgency to proceed asap in particular agreeing and refine the roles and responsibilities of the Customer Support Workstream, but the DNO members were

asked to seek the views of their respective ENFG members in particular the resources and funding costs of the 4 workstreams.

Action: DNO/IDNOs

9. DCode Qualifying Standards

9.1 March 2018 progress update

Referencing paper [DCRP_18_03_07](#) DS provided the Panel members with a progress update on all Annex and Annex 2 qualifying standards currently undergoing revision. There were no issues and work was progressing to schedule.

Panel noted progress.

9.2 Request to DCRP to commence revision work on the following qualifying standards

DS requested the approval of the Panel to include the following DCode qualifying standards onto the 2018 revision programme. Those documents were as follows:

- ER P29 - Planning limits for Voltage Unbalance in the UK
- ER P18 – Complexity of 132kV Circuits
- ENA DG Connection Guides

Panel agreed to the request

10. Ofgem DCode Qualifying Standards Review

At the previous Panel meeting in February the Ofgem representative requested that the Panel undertake a review of all Annex 1 and Annex 2 Qualifying Standards to ensure they meet the specific DCode criteria for being assigned as a Qualifying Standard and those that did not should be removed or reassigned i.e Annex1>Annex2 or Annex2 >Annex1. The example given was the recent approval of ER P25 which in the view of Ofgem was not a Annex 1 document and therefore should not have been submitted for approval by the Authority. Referencing paper [DCRP_18_03_08](#) DS set out the details of the relevant qualifying standards and the current DCode materiality test which determines what should be defined as a QS. The Panel was requested to consider the Ofgem request and recommend an appropriate course of action. It was agreed that a small sub group should be set up to review the annex 1 & 2 documents including reviewing and agreeing a suitable and effective future DCode materiality test.

Action: DS/ITCG

11. Panel membership Update – Proposals for New Membership

Referencing paper [DCRP_18_02_06](#) DS provided the Panel with an update on DCRP membership.

Kate Dooley representing non- BM generators has left Energy UK and has been replaced by Kyle Martin for the foreseeable future. The Panel expressed their thanks for the support provided by Kate and wished her best wishes in her new role at ESB. DS will update and publish a revised Panel membership list to the DCode website.

Action: DS

12 . Code Administration Issues

Referencing paper [DCRP_18_03_10](#) DS provided the Panel with a brief update on recent Code Administrators (CAs) Meeting held 19 March. Three key issues included:

12.1 Brexit

It was noted by the CAs that there were two options for progressing code changes:

1. The normal, sequential process with Licence modifications followed by Code Modifications; or
2. A ‘compressed’ process whereby the Licence Modifications and Code Modifications are carried out in parallel.

Ofgem believe that the ‘compressed’ process provides the best opportunity to deliver the project on time. CAs agreed to use the CACoP as a forum for developing a common strategy for identifying and implementing the changes required to the Codes as a result of Brexit.

CAs identified that there will be two categories of changes required:

1. From EU Exit day one, the Modifications would be primarily housekeeping, and these would be identified as the changes that would be needed to keep the codes working; and
2. From EU Exit day two, the Modification would be more technical and would need a steer from Ofgem in how they are progressed. DS noted that the required amendments for DCode are primarily housekeeping and will be a relatively minor exercise e.g. updating EU law to GB law.

The CAs agreed there should be a common strategy across the Codes for managing the changes. It was requested that Ofgem set out its overall plan for Brexit amendments. This will allow CAs to develop a common plan, including the process and timescales for raising and implementing mods. This can then be communicated to all Parties.

It was agreed that the CAs should continue to feed into Ofgem’s EU Exit Group and all CAs will consider developing a list of questions that need answers from Ofgem. The group will then be able to organise next steps and look at the potential of producing a joint strategy that they can present to their respective Panels. DS will update Panel on progress at the next meeting in June.

Action: DS

12.2 Ofgem Sandbox

Ofgem attended the meeting to provide an update on its Innovation Link (Sandbox) programme and seek support from Code Administrators (CAs) to develop a cross-code process to facilitate, support and identify changes to the Codes that may support innovations. The main aim of the meeting was to open the door to the idea of introducing a new Principle into the CACoP. The Ofgem representative took an action to draft a new Principle to reflect discussions at the meeting. All members agreed to present the revised document to their respective Panels for comment and feedback via the CACoP Secretariat in advance of the next meeting. DS will share the Panel once the proposed new Principle is available.

Action: DS

12.3 CACoP Review

The DCode representative (DS) presented the revised CACoP to all CAs which had been updated to reflect the changes made from the 2017 customer feedback survey and agreed at the January meeting. Members

agreed that the updated CACoP document will be presented to each Code Panel following the revisions by Ofgem to Principle 12. DS will update Panel on progress at the next meeting in June.

Action: DS

13. AOB

None

14. DCRP Administrative Review

The Panel was happy and content with the Code administration services.

15. Date of next meeting

- **Thursday June 7th at ENA commencing at 1330.**

Please note that this meeting will be held at the new ENA office location at 4 More London Riverside, London SE1 2AU.

[Directions can be found here.](#)

13. Remaining DCRP & ITCG Meeting Dates for 2018

- Thursday 9th August
- Thursday 4th Oct
- Thursday 6th Dec

All meetings will be held at ENA London.