

Distribution Code Consultation Response Proforma

DCRP/20/05/PC: EREC P18 Issue 2 – Complexity of circuits operated at or above 22kV

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, 04 September 2021** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/20/05/PC EREC P18 Issue 2. 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	<i>Kate Dooley</i>
Company Name	RES
No. of DCode Stakeholders Represented	1
Stakeholders represented	<i>RES</i>
Role of Respondent	<i>Generator developer</i>
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
Q1	Do you agree with the general intent of the proposed modification? If not, please explain your views.	<p>First published in 1978 and modernised in 2003, RES agrees that it is appropriate to review and publish a second issue of Engineering Recommendation P18 in light of the increased amounts of distributed generation connecting to the network and of the changing energy system.</p> <p>RES agrees that additional clarity is always welcome, as is harmonisation across DNOs which have individually implemented their own internal standards describing the permitted complexity of distribution circuits <132kV.</p> <p>However, RES is concerned that extending EREC P18 in a blanket approach to > 22kV as is suggested in the consultation is the wrong approach. We believe that a review of materiality and impact to competition is necessary before implementation. There may be more efficient solutions than extending the EREC P18 to achieve the same outcome, and therefore a degree of flexibility is necessary for <132kV circuits. Or it may be that it is necessary to implement EREC P18 to > 22kV circuits to ensure a robust and secure network fit for the future Net Zero system. In which case it is our view that this is a strategic upgrade that should be articulated and provided for in ED2 rather than through this modification.</p>
Q2	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	<ul style="list-style-type: none"> (i) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the distribution of electricity. – <i>Neutral. There may be more efficient and economical solutions to achieving the same outcome</i> (ii) To facilitate competition in the generation and supply of electricity. - <i>No. RES is concerned that this could have an adverse impact to competition which is even more of a concern given the pace at which we have to deliver flexibility and renewables to meet Net Zero and milestones leading up to Net Zero.</i> (iii) Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators. – <i>Neutral</i> (iv) Promote efficiency in the implementation and administration of the Distribution Code – <i>Neutral. RES supports harmonisation and codifying standards across DNOs however for the concerns highlighted in this consultation we cannot say that this particular modification has a positive impact on efficiency in implementation and administration of the Distribution Code.</i>

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	Question	Response
Q3	Since many DNOs have internal standards that apply the principles of EREC P18 Issue 1 to EHV circuit design, do you agree that extending the scope to include circuits operating at 22kV and above brings benefits in terms of harmonisation and commonality?	Yes, RES agrees that harmonisation and standards cross the DNOs is beneficial.
Q4	Do you agree with the proposed implementation approach? If not do you have an alternative implementation approach?	No comment
Q5	Do you have any comments on the proposed legal text drafting?	No
Q6	Do you have any other comments?	If you would like to engage further on this, please do not hesitate to get in touch with kate.dooley@res-group.com and Patrick.smart@res-group.com

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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