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Electricity Distribution Licensees,
Distribution Code Review Panel
(DCRP)
c/o Energy Networks Association

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Dear Electricity Distribution Licensees,

Authority decision to "send back" Distribution Code DCRP/MP/20/06 – Modification to Storage within the existing Distribution Code Documentation

We[1] received the Final Report for DCRP/MP/20/06[2] from the Distribution Code Review Panel (DCRP) on the 26 April 2021. The modification proposes the removal of the current exemptions applied to storage within existing Distribution Code Documents and clarifies the requirements for storage in the Distribution Code v45[3], EREC G98[4], and EREC G99[5]. The modification proposal amends the requirements in the following areas:

- The proposal removes exemptions and proposes a series of requirements that applies to Electricity Storage devices commissioned on or after 01 September 2022.
- The proposal sets out the expected Electricity Storage response during falling frequency events and associated type testing requirements.
- Expands the definition of Energy Storage to explicitly capture electric vehicles if configured to work in vehicle to grid mode, that is, acting as source of electrical energy supply to the Customer's Installation and/or the DNO's Distribution Network.

[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] 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/
[3] http://www.dcode.org.uk/assets/uploads/DCode_v45_20200612.pdf
[4] https://www.energynetworks.org/assets/images/Resource%20library/ENA_EREC_G98_Issue_1_Amendment_4_(2019).pdf
[5] https://www.energynetworks.org/assets/images/Resource%20library/ENA_EREC_G99_Issue_1_Amendment_6_(2020).pdf

- Proposes a series of example installations that set out the logic for Vehicle to Grid Electric Vehicles installations, detailing when they are classed as storage and generation and therefore requiring compliance with EREC G99.

We have reviewed the Final Report and cannot properly form an opinion on the approval of the modification proposal based on the information submitted. We direct that the Final Report is revised and resubmitted. We are therefore sending the Final Report back to the DCRP to address the issues we have identified below.

1. We are concerned about the level of stakeholder engagement and the responses provided. The Final Report notes that 6 responses were received but no equipment manufacturers, trade associations or standards bodies responded to the consultation. Given the potential high impact of the proposed modification on equipment manufacturers, we are of the view that the Final Report should seek to demonstrate, whether there is strong stakeholder support across industry participants including manufacturers. The Final Report should detail industry engagement in the workgroups and engagement with external bodies such as EV energy task force[6].

2. The final report proposes a series of optional performance characteristic for storage under falling frequency and highlights an interaction with proposed Grid Code modification GC0148[7]. Grid Code GC0148 intends to cover a similar scope and includes the development of requirements for storage operation during low system frequencies, and the associated recovery. The final report assumes that the proposed distribution code optional performance characteristic will be consistent with GC0148 and can be made mandatory when the grid code work is completed. GC0148 is at the proposal stage and the scope and timescales for completion are not certain. We are of the view that the Final Report should seek to demonstrate whether GC0148 and DCRP/MP/20/06 are aligned from a technical perspective, to give evidence that the requirements introduced in the proposed modification will become mandatory and endure.

After addressing the issues identified above and revising the Final Report accordingly, the DCRP should resubmit it to the Authority for a decision as soon as practicable.

Peter Bingham

Chief Engineer

Signed on behalf of the Authority and authorised for that purpose

[6] EV Energy Taskforce: Proposal to Actions - Electric Vehicles (catapult.org.uk)
[7] GC0148: Implementation of EU Emergency and Restoration Code Phase II | National Grid ESO