

Modification proposal:	Distribution Code: DCRP/MP/18/09 Revision of Engineering Recommendations (EREC) G98 and G99 for the storage fast track process		
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:	29 th November 2018	Implementation date:	10 th December 2018

Background

Engineering Recommendation G98/1-1(2018)³ (EREC G98) sets out the requirements for fully type tested micro-generators up to 16A per phase connected in parallel with the Low Voltage (LV) distribution network. Engineering Recommendation G99/1-1(2018)⁴ (EREC G99) sets out the requirement for the connection of generation equipment in parallel with public distribution networks and covers all generation above 16A per phase.

Both EREC G98 and EREC G99 are Distribution Code Annex 1 documents and will be applicable to customers seeking to connect on or after 27 April 2019 and supersede the existing Annex 1 documents in EREC G59⁵ and G83⁶. The scope of these documents include the requirements for generators and storage modules seeking to connect to the distribution network.

Due to the volume of applications for small scale storage connecting to the Low Voltage Network, the Energy Network Association (ENA) co-ordinated an EREC G59 fast track storage procedure⁷, which electricity distribution licence holders have implemented. This has allowed for a simplified connection procedure, and reduced response times when compared with a standard EREC G59 application.

Due to time constraints and electricity distribution licensees' need to review the drafting of the fast track procedure for small scale storage, the fast track procedure was not incorporated into the initial version of EREC G98 (EREC G98 Issue 1 Amendment 1) or EREC G99 (EREC G98 Issue 1 Amendment 1) as published. To ensure that EREC G98 and EREC G99 reflect current practice with regards to the treatment of small scale storage, the EREC G59 fast track procedure should be incorporated into EREC G98 and EREC G99.

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 Engineering Recommendation G98/1-1 (2018) (EREC G98):

http://www.dcode.org.uk/assets/uploads/ENA_EREC_G98_Issue_1_Ammendment_1_2018_2.pdf

⁴ Engineering Recommendation G99/1-1 (2018) (EREC G99):

http://www.dcode.org.uk/assets/uploads/ENA_EREC_G99_Issue_1_Ammendment_1_2018_1.pdf

⁵ http://www.dcode.org.uk/assets/uploads/EREC_G59_3-4_Final_for_publication_160518_1.pdf

⁶ http://www.dcode.org.uk/assets/uploads/EREC_G83-2-1_Final_for_publication_160518_1.pdf

⁷ Application Process for EREC 59 Energy Storage Devices:

<http://www.energynetworks.org/assets/files/Proposed%20application%20process%20for%20EREC%20G59%20Energy%20Storage%20Devices%20-%20June%202018.pdf>

The modification proposal

DCRP/MP/18/09 seeks to introduce a fast track process for domestic scale storage devices, to expedite their installation and provide good customer service. Such that these processes are consistent with current practices implemented by the electricity distribution license holders.

The panel considered that EREC G99 was the most appropriate document in which to capture the fast track procedure as the original procedure was an EREC G59 addendum and EREC 99 is the replacement to EREC G59. This modification proposal however, proposes changes to both EREC 99 and EREC 98. The procedure will be incorporated in the updated EREC G99 as the Integrated Micro Generation and Storage procedure and referenced in the updated EREC G98.

The proposed EREC G98 modifications can be summarised as follows:

- EREC G98 will be modified to make it clear that connection of new electricity storage devices will be via Clause 6.2.2 of EREC G99 Integrated Micro Generation and Storage procedure for customers with an existing Micro-generator which conforms with the EREC G83 or EREC G98 requirements. The proposed changes are required as the aggregated capacity may exceed 16A per phase and thus exceed the bounds of EREC G98.
- EREC G98 will be modified to make it clear that connection of new export limited schemes under G100 consisting of new micro-generators and energy storage devices will be via the EREC G99 Integrated Micro Generation and Storage procedure for customers. The invertors associated with the new micro generator and energy storage facility must conform to EREC G98 requirements. Again, the proposed changes are required as the aggregated capacity may exceed 16A per phase and exceed the bounds of EREC G98.

To be clear, the proposed Integrated Micro Generation and Storage Procedure does not apply where the total aggregated capacity of the Micro-generators (both non-Electricity Storage and Electricity Storage) installed on the customer site is less than or equal to 16A per phase. In circumstances where the total aggregate capacity of the Micro-generators and storage is less than, or equal to 16A per phase, only EREC G98 will apply.

The proposed EREC G99 modifications can be summarised as follows:

- The Integrated Micro Generation and Storage Procedure that will be incorporated into EREC G99 mirrors the Fast Track Application Process for EREC G59 Energy Storage.
- The Integrated Micro Generation and Storage procedure will apply to single generator sites where the total aggregated capacity of the generator and storage devices is between 16A and 32A per phase.
- The Integrated Micro Generation and Storage Procedure is applicable to generators with a maximum output 16A and the storage device with a maximum output 16A. If either the storage device or the generator exceed this limitation, the Integrated Micro Generation and Storage Procedure will not apply.
- Two new forms have been added to the EREC G99 appendices, for use with the new procedure (EREC G99 Annex A1-2 application form and EREC G99 Annex A3-2 installation document).

A full list of conditions applicable to the Integrated Micro Generation and Storage Procedure is proposed in EREC G99, if these condition are not met the Generator (including storage) should refer to the connection application procedure for Type A Power Generating Modules, detailed in EREC G99 Annex A0.

A public consultation on the proposed changes opened on 14 August 2018 and closed on the 11th September 2018. Five responses were received, which were all supportive of the proposed changes⁸.

The changes will be captured in two updated documents:

- EREC G98 Issue 1 Amendment 2
- EREC G99 Issue 1 Amendment 3

To enact the changes, an update to references in Annex 1 Qualifying Standards of the Distribution Code⁹ will be required.

Distribution Code Review Panel (DCRP)¹⁰ comments and licensee recommendation

At the DCRP Panel meeting on 4th October 2018, the Panel considered that the modification proposal would better facilitate the Distribution Code objectives and therefore recommended its approval.

The Final Modification Report ('Final Report') for DCRP/18/09 was submitted to us on 26th October 2018. The DCRP considered that the modification proposal would better facilitate the Distribution Code objectives. Specifically, the DCRP felt that the modification proposal better facilitates Distribution Code objective (a).

This modification was also recommended for approval by the Distribution network licensees.

Our decision

We have considered the issues raised by the modification proposal and in the Final Report dated 26th October 2018. We have considered and taken into account the responses to the consultation(s) on the modification proposal which are included in the Final Report.¹¹ We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the applicable objectives of the Distribution Code;¹² and
- approving the modification is consistent with our principal objective and statutory duties.¹³

Reasons for our decision

We consider this modification proposal will better facilitate Distribution Code objective (a) and has a neutral impact on the other applicable objectives

⁸ DCRP 18/09/PC Closed Consultations <http://www.dcode.org.uk/consultations/closed-consultations/>

⁹ Distribution Code http://www.dcode.org.uk/assets/uploads/DCode_v33_230718_1.pdf

¹⁰ The DCRP is established in accordance with SLC 21 of the Electricity Distribution Licence.

¹¹ 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/>

¹² 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>

¹³ 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.

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

The development of The Integrated Micro Generation and Storage procedure incorporated in the updated EREC G99 and referenced in EREC G98 allows an efficient and economic system for the treatment of small domestic energy storage systems and will shorten and simplify the connection process associated with these devices.

Observations

We note that the DCRP has proposed a separate modification to EREC G99 under modification proposal DCRP/MP/18/07 to address Limited Frequency Sensitive Mode compliance requirements. In order to make best use of the DCRP's time, limited modifications, such as that proposed by this modification should be collated and processed as a single update such that documents are complete so far as reasonably practicable. We also encourage the DCRP to consider potential proposals for distribution code open governance arrangements.

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 Report to the Authority of 26th October 2018 be made.

Peter Bingham
Chief Engineer

Signed on behalf of the Authority and authorised for that purpose