Electricity Network Innovation Competition Full Submission

Supplementary Answer Form

Project: Black Start from Distributed Energy Resources

Tick if this answer has been provided verbally: ☐

Project code	ESOEN01	Question Number	1
Question date	07 August 2018	Answer date	09 August 2018
Submission section question relates to	Section 7: Regulatory issues		
Topic	g) Demonstration of a robust methodology and that the Project is ready to implement		
Question	Please provide such information as is sufficient to discharge the requirements of paragraphs 5.13 and 5.14 (pg30) of the Governance Document in relation to derogations.		
Notes on question			
Answer	In our bid we identified the possibility that a derogation will be required but we have not identified the precise details of any such request, including any evidence that would be used, because they are not known at this time. The code of greatest relevance to this project is the Distribution Code. Distribution Operating Code 9 (DOC9) on Contingency Planning already has provisions for Black Start that recognise the potential role of DNOs in issuing instructions to achieve system recovery, the establishment of Power Islands and re-synchronisation with the rest of the system. DOC9.4.1.1 notes that during a Total or Partial Shutdown and during the subsequent recovery the normal licence standards may not apply and the system may be operated outside normal voltage and frequency limits. DOC9.4.3.2 already describes an overall strategy for DNO actions in Black Start that would be compatible with what is proposed in this project. We believe DOC9 already facilitates the more active role DNOs are expected to play in the Black Start from DER concept and this means that derogations do not need to be sought for an actual Black Start situation. However, our view is that the live trials proposed in this project would not be covered by this.		

	The need for derogation from technical codes or standards for the live trials will be determined in Workstream 3. In the Options Stage (Jan-Aug 2019) the "Case study selection and development" task will develop the options for energisation and restoration and identify barriers to implementation in each case study. This will include examining the need for derogations. In the Design Stage (Jul 2019 – June 2020) the "Review opportunities for demonstration" task will determine the specific restrictions and opportunities for live trials and consider the impact on participating and non-participating customers, e.g. reduced security. This will support the detailed definition of any required derogation request, which will be reviewed and approved for submission by the Steering Committee in the "Proposals for demonstration" task in Q2 2020. This provides six months for Ofgem to decide on the derogation request before the live trials in the Confirm Stage (Jan-Dec 2021). Any derogation requests will follow the latest Ofgem guidance available at the time. As noted above, DOC9 already provides adequate flexibility for a Black Start situation but the project will consider what changes to industry codes may be required to support actions outside of an actual Black Start situation, for example to support implementation and ongoing testing of new Black Start from DER capabilities. It is possible that any conflict with existing codes and standards is specific to particular locations or circumstances rather than being a barrier to roll-out across all of GB. Project learning will dictate whether we recommend that derogations be sought on a case-by-case basis or if codes should be revised. Given that technical proposals in the project will be developed in collaboration with stakeholders and subject to industry-wide consultation and review, we do not anticipate making recommendations for any significant changes to the technical aspects of regulatory arrangements that Ofgem would not support. We believe that DOC9 demonstrates that Ofgem, and the industry as a whole, already supports the Black Start from DER concept.
Attachments	