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27 April 2018

Dear Chrissie

**GC0106 Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL) – UK Power Networks response**

Thank you for the opportunity to respond to the above consultation. Our response should be treated as consolidated on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc.

We acknowledge that the modification proposal has been recommended in order to implement changes found in the System Operator Guidelines (SOGL) Code. We have reviewed the consultation and supporting documentation and provide the following feedback with respect to the proposed changes to the Grid Code regarding structural data submissions from Distribution Network Operators (DNOs):

- In the absence of further guidance or consultation documents that may yet be presented, we have no alternative proposal to make.
- We do not object to the proposed implementation approach and legal text in the Grid Code PC.A.1.2 (iii). However, we do require additional information in the form of guidance on how updated Schedule 5 data will be required – in particular with respect to load assumptions and/or considerations for plant commissioned between submissions. This will allow us to understand the changes to and business impacts on our current processes required to produce the Week 24 submissions.

Please could you outline how you envision the current guideline document to change and how you will consult with DNO stakeholders on this.

- We wish to raise the following points with respect to the proposed changes to PC.A.3.1.4, relating to the provision of information on embedded small power stations with a registered capacity below 1MW.
  - Although we agree with the proposed changes to EREC G83 and EREC G98 in order to facilitate DNOs obtaining the data required by the National Grid ETSO, EREC G83 states

that: “The installer is to ensure that the DNO is made aware of the Small Scale Embedded Generators installation at or before the time of commissioning”<sup>1</sup>

- We therefore rely on the information provided by customers (or their installers) and until the proposed changes in EREC G83 and EREC G98 are implemented, customers will still use the valid Appendix forms (found on either Appendix 3 on EREC G83 or Form B on EREC G98) to inform DNOs of their installation. The information provided might not have all the information as required by the National Grid.
- As such, it is important to clarify that UK Power Networks will use reasonable endeavours to supply the information requested beginning from the 2019 Week 24 submission, but it may nonetheless be the case that the required information from the plant may be missing. The legal text should clearly recognise such circumstances and not inadvertently risk penalising licensees for not providing information which they have not received.
- Furthermore, we would like to propose that “Electricity Storage” is included in the list of technology types in the EREC G83 and EREC G98 proposed amendments. This would enable DNOs to also gather Electricity Storage data and prevent future modifications if this type of distributed energy resource is to be reported as well.

With regards to the legal text proposed, we would like to put forward the following amendments to the legal wording for PC.A.3.1.4 (iii):

*(iii) beginning from the 2019 Week 24 data submission, the aggregated per production types from the list in PC.A.3.1.4 (a)(ii)(2)(a) for all Embedded Small Power Stations of Registered Capacity of 1MW or less advised [under EREC G83] to the Network Operator by the relevant date*

In addition we also propose the following amendments to the legal wording for the Distribution Planning and Connection Code:

*D.P.C 8.3.2 On request from a User, the DNO will notify the User of all the data submitted by and relating to that User under DPC8 that the DNO is holding and using for Distribution Code purposes.*

I hope the above feedback has been constructive. If you have any questions, please do not hesitate to contact Sotiris Georgiopoulos ([Sotiris.georgiopoulos@ukpowernetworks.co.uk](mailto:Sotiris.georgiopoulos@ukpowernetworks.co.uk)) in the first instance.

Yours sincerely



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Paul Measday, Regulatory Returns & Compliance Manager

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<sup>1</sup> EREC G86 Issue 2. Page 5 – Legal Aspects