

Minutes of Distribution Code Review Panel Meeting - 30th April 2018

Present:

Ellen Diskin (ED)	Chair
Stephen O'Sullivan (SOS)	Secretary
Tony Hearn (TH)	DSO
Stephen Walsh (SW)	DSO (Alternate)
Joe Duignan (JD)	ESB Networks (presenting)
Ivan Codd (IC)	ESB Networks (presenting)
Pat Dowling (PD)	ESB Networks (co-presenting)
Neassa McCabe (NMCC)	ESB Networks (co-presenting)
Shane Maher (SM)	EirGrid (co-presenting)
Robert O'Rourke (ROR)	CRU
Mantas Vencius (MV)	CRU
David Lindsay (DL)	CRU
Lisa McMullen (LMcM)	TSO
Mark Phelan	PES/Independent Suppliers (Alternate)
Michael O'Hara (MOH)	ETCI
Peter Kavanagh (PK)	Embedded Generators (solar)

Apologies:

Derek Hynes (DH)	DSO
Ger Beatty (GB)	Synchronous Generators Ireland
Ciaran Donnelly (CD)	Embedded Generators (wind)
Conor Minogue (CM)	Major Customers
Jim Wynn (JW)	PES/Independent Suppliers

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1. Review of Previous Minutes:

- Regarding Controllability down to 1 MW for all generation , there is ongoing action on the next steps noted in the previous meeting's minutes regarding the DSO RTU and TH confirmed that this will accommodate the necessary signals list.
- LMCM added that any costs associated with the TSO accessing the DSO RTU are to be assessed.
- The Conditions Governing Connection to Distribution System document is being approved by ED and DH and will then be circulated for comment to the DCRP, prior to its publication. It was noted that the comments and contributions of DCRP members would be welcomed. A draft copy was given to the CRU.
- It was noted by the chair that Modification #42 had been approved by the CRU and has been posted on the ESNB website.

Actions:

- The Conditions Governing Connection to Distribution System document is to be circulated to the panel.

2. Derogations Update:

- LMCM explained that it will be September before the TSO is able to allocate resources to concentrate on assessing derogation applications, however the TSO will be validating applications so as not to have implication for operational certificates if required by customers for financial reasons. Expiring derogations will also be prioritised. LMCM added that there are a number of DMOL related applications which the TSO will be recommending for approval.
- SOS explained that the DSO currently has 59 permanent derogation applications and 10 temporary derogation applications to assess.

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3. NSAI Completion Certificate:

- MOH addressed the panel regarding the NSAI Completion Certificate which had been due in January 2018. MOH explained to the panel that NSAI are no longer going to be directly involved in this certification project and though the proposal will become a 'recommendation', it will not be a formal standard. MOH added that the NSAI say that enforcement and management of Completion Certificates is the statutory responsibility of the Regulator and it is out of TC3's remit.
- MOH explained that the most recent document that was issued by NSAI will be a recommendation as opposed to an official standard.
- ED asked if there were any next steps planned to which MOH answered no, unless the Regulator get involved. MOH added that TC3 will be taking this up further with the Regulator, which was already aware through involvement with TC3, and it will also depend on due attention from other parties including the SOs and contractors.
- ROR requested MOH to flag this issue with the Regulator's safety team.
- ED expressed the importance of resolving this issue.

Actions:

- MOH to raise this issue with the Regulator's safety team.

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4. Modification Proposal #43 - Proposed Distribution Code structural changes to facilitate adoption of RfG (and subsequent) Network Codes:

- TH spoke to the panel on the proposed Modification #43 which was previously distributed to the panel on 20.02.18. TH explained the inclusion of an Applicability Matrix within the Modification where the word 'topologies' will replace the word 'types' as they have been used in the Code to date. (The EU Network Codes introduce 'Types' which will have to be adopted in the Distribution Code, so changing the existing 'types' to 'topologies' is to avoid confusion). For example types; (a), (b), (c), (d) for wind in the current Distribution Code will be replaced by topologies (1), (2), (3), (4), (5).
- The proposed Modification also includes a new column of 'Cohorts'. A 'cohort' is a group of system users who are deemed 'existing' if connected prior to a given date, thus exempt from EU Network Code requirements which cannot be retrospectively applied (as per EU law). These 'cohorts' will have been established and defined under Modification #36, and where they apply will capture various Dates of Effect for "go-forward" new elements brought about by the adoption of RfG and/or DCC in due course.
- TH explained that the word 'cohort' is the only word that's has not yet been used in the Distribution Code so far and asked the panel if anyone had a possible alternative wording in mind.
- TH also proposed within Modification #43 to use demarcators within the Distribution Code in order to aid understanding for the reader, and to distinguish new content driven by the EU Network Codes and existing content changed due to the EU Network Codes.
- Text with a solid line down the left hand side in the Distribution Code would be new text introduced by an EU Network Code.
- Text with a dashed line down the left hand side would be existing text that had been altered by the EU Network Code.
- Text with either solid or dashed lines will not apply to existing generators.

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- TH asked the panel if there were any objections to the Modification.
- ED offered for the members to follow up on the proposed Modification with herself or TH at any time, and emphasised the importance of a Modification to the Distribution Code as the European Network Codes cannot be transposed into the Distribution Code until a format has been agreed to house it.
- ROR stated that the CRU will be engaging on this over the coming weeks.
- ED asked the members for thoughts on the proposal.
- PK agreed that it is a reasonable approach and proposed that a possible option could be to change the colour of the text in order to make it clearer within the Distribution Code.
- MOH proposed differences in the Distribution Codes as a result of this Modification could be inserted into shaded areas in order to be distinguishable.
- ED proposed that a mock-up of both suggestions be drafted and circulated to the panel at the next meeting. With the hopes of the proposed Modification going to a vote at the same meeting.
- It was agreed that the DCRP would aim to approve the Modification at the next meeting, and all parties were urged to contribute suggested alternatives if they were not yet in a position to recommend approval of the Modification.

Actions:

- Both mock ups to be and circulated to the panel at the next meeting, such that the DCRP can move to recommend the proposed Modification at the same meeting.

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5. Modification Proposal #36 – Power Park Modules:

- TH presented to the panel on proposed Modification #36 which was previously distributed to the panel on 12.01.18. TH spoke of two drivers for the drafting of the proposed Modification:
 1. EirGrid' desire to extend MW controllability for Windfarms from 5MW to 1MW.
 2. To fill the technical requirements gap for Solar Farms with in the Distribution Code.
- In order or extend MW controllability for Windfarms from 5MW to 1MW the proposed Modification proposes that relevant rows of Table 6 would be amended to 1MW, and references to threshold values in the body of DCC 11.2 would be removed.
- In order to fill the technical requirements gap for Solar Farms Modification #36 proposes that references to Wind Farm Power Stations [WFPS] would mostly be changed to Power Park Modules[PPMs] with a very small number of exceptions where WFPS would be retained. It also proposes that DCC 11 be re-named 'ADDITIONAL REQUIREMENTS FOR POWER PARK MODULES'.
- TH discussed the use of a table with a column for 'cohorts' and a 'date of effect' column. He also went through the changes to DCC 11 and various wording changes with some sections of the proposed Modification taken directly from the RfG code.
- PK questioned where the costs of implementation are expected to be borne, expressed that there is a concern regarding the impact of controllability costs, and would like to be clearer on where the costs arising will be allocated.
- LMCM noted that associated costs had already been included in the relevant offers issued (and in many cases accepted) since 2016. LMCM would confirm the date when this commenced. So there should be no additional cost, but rather a reduction on this cost (to be determined once costs for TSO access to DSO RTU have been confirmed).

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- ROR stated that the CRU does not support that this derogation be non-retrospective, but that the CRU may recommend a class derogation for existing generation. A date for either non-retrospection (SOs preferred approach) or derogation (CRU suggested alternative) may not be included in the actual Modification.
- ED sought clarification as to who would request a class derogation, and the response was the DCRP itself or the SOs.
- TH responded by saying that the European Network Codes are explicitly non-retrospective in the relevant legislation.
- ED proposed that per the CRU preference that Modification #36 be retrospective, and that the concepts of non-retrospection and cohorts would need to be transferred into Modification #43. ED asked if the industry would be happy to recommend Modification #36 for approval in retrospective form, on the basis of herein seeking preparation of a class derogation to be submitted to CRU along with recommending Modification #36.
- ED asked the panel if they were any questions on the proposed Modification, and then proposed that it be recommended for approval at the next meeting due to the importance of providing certainty to the solar industry. ED noted that until it is approved, there are no provisions for solar within the Distribution Code. ED suggested that both a revised, retrospective Modification #36 and a request for class derogation be prepared for the next meeting.
- ED will ask panel members one week after this meeting via email suggested dates for generation to be deemed 'existing' for the purposes of preparing a class derogation from Modification #36, and stated that if no proposals were received, a date would be circulated. If no alternatives were proposed within 7 days of receipt of the proposed date, it would be deemed accepted for the purposes of preparation a draft class derogation request.

Actions:

- Both a revised, retrospective Modification #36 and a class derogation be prepared for the next meeting.
- ED will contact the members via email with a proposed date for generators to be included in a class derogation from Modification #36.

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6. European Network Codes: Update on RfG implementation:

- TH provided an update on RfG and made reference to the 1.1 p.u. issue, and stated that it is under active discussion between SOs, the CRU, and third parties including IWEA. TH described the most likely solution which was being developed by the DSO, based on modifying the declared supply voltage upwards and seeking that 1.1 p.u. would refer to this voltage rather than the nominal voltage.
- TH and LMCM also updated on actions which were under consideration with regard to adopting an alternative date of effect for the EU Network Code provisions. This has been done in other jurisdictions, including GB. It would require Government approval and / or submission. ENTSO-E legal have confirmed their understanding that this is provided for legally.
- LMCM added that the SOs are jointly putting together a parameters document following the consultation process on RfG, which details the selected parameters and addresses the responses received to the consultation. This will be submitted to the CRU for approval before the deadline of 17.05.18.
- ROR asked the panel if industry have comments or preferences on the points raised.

7. Planning Standards Review:

- IC gave a presentation on the recently begun Distribution Security of Supply and Planning Standards Review, and explained that the project timeline is expected to be 18 – 24 months. These are the standards used when planning new demand and generation connections to the distribution system.
- The existing Planning Standards will remain in place until final approval of the revised Planning Standards by CRU (following a technical review & public consultation).
- Phase 1 of the project will revolve around researching options to modify or add to the existing provisions, customer engagement, potentially trials, and options development. This will require stakeholder engagement with demand customers and generation customers, as well as the DCRP and the TSO. Phase 2 of the project will

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evaluate options, and transpose the results into new Planning Standards, which will be consulted on prior to submission to CRU for approval.

- It is envisaged that the project will be completed by Q1 2020.
- PK commented that this is a very welcome piece of work and queried whether any aspects of it that could be brought forward before Q1 2020.
- IC will keep the panel informed on the progress of the project.
- IC also discussed the Demand Connection Code (DCC), and stated that the project has been initiated to address the implications of DCC on distribution planning activities and the Planning Standards. Changes will be incorporated into revised Planning Standards and ESNB presently intend on employing consultancy support for this task.

8. Enduring Connection Policy (ECP) Presentation:

- JD (ESBN) and SM (TSO) gave an overview presentation on ECP-1, and discussed its time line. Please see attached slides in Annex 1.
- PK asked if DS3 applicants will be prioritised when it comes to processing timelines for the 2018 batch.
- JD and SM noted the point raised by PK and advised that they will be cognisant of this and other issues when the 2018 batch is being processed.

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9. Any Other Business:

- ROR announced that this would be MVs last DCRP meeting as he is changing roles with in the Regulator. DL will be taking over the role from MV.
- ED added that the DSO is aiming to keep bringing new topics of interest before the panel and asked the panel if they have any topics of relevance to them or those that they represent that they would like discussed at future meetings then they could recommend them to herself or SOS.

10. Next Meeting Date:

- A date in June was proposed for the next meeting and will be conformed at a later date.

Annex 1:

Enduring Connection Policy Step 1 (ECP-1) Overview

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ECP-1 Key rules (1/2)

- Suspension of non-GPA (including solar)
- Applicants in process have option to folded in to ECP-1 (circa 1.3GW)
- Intended recurring smaller more frequent batches, first 2018 next 2020
- 2018 batch opened 27 April and closes 28 May
- Anticipated 1st offers to start issuing in 2018
- 2018 batch will be at least 1000MW with additional projects that in process that can "fold in" (CRU cap/set actual batch size once all applicants are known)
- Prioritise the first 400MW of the 2018 batch to DS3 providers



ECP-1 Key rules (2/2)

- Generator planning permission required (not for DS3)
- Stronger commitment model e.g. via the introduction of upfront shared bonding and interdependent offers
- Small scale generation (< 500kW and auto producers) non-batch process (with annual cap)
- No capacity relocations (once off 3 month window for existing contracted connections to relocate to a site with planning)
- Capacity non-firm at transmission (open to all technologies)



Timelines and Next Steps

- 27.03.18 - ECP Decision
- 27.04.18 – window opens 2018 batch
- 28.05.18 – window closes 2018 batch
- 29.06.18 – window closes for once off relocation mods
- June/July 2018 – review of applications / CRU confirm batch size / finalise applicants successful for inclusion in 2018 batch
- Q3 2018 → commence processing of 2018 batch
- Q4 2018 → commence issuance of 2018 batch offers
- 2019 → offer delivery schedule will depend on many factors such as connection methods/works required and customers timelines (e.g. planning permission, procurement dates)

