

Minutes of Distribution Code Review Panel Meeting – 1st April 2014

<u>Present:</u>	Derek Hynes (DH)	Chairman
	Paul Harrington (PHR)	Secretary
	Nigel Morris (NM)	CER Representative
	Ciarán Donnelly (CD)	Embedded Generators Representative
	David Cashman (DC)	TSO Representative
	Tony Hearne (TH)	DSO Representative
	Sean Doolin (SD)	PES Representative
	Mick O'Hara (MOH)	ETCI Representative
	Keith Moore (KM)	ESB Networks
	John O'Donoghue (JOD)	ESB Networks

<u>Apologies:</u>	Catherine Joyce-O'Caollai	Major Customers Representative
	Ciarán O'Brien	Independent Suppliers Representative
	Rónán Ó hÓgartaigh	DSO Representative
	Paul Hickey	ESB Networks

1. Review of Previous Minutes

- The minutes of the last DCRP meeting (3rd December 2013) were accepted by all.

2. Presentation on new version of Distribution Code (v3.0)

- An updated version of the Code will be published each year.
- KM presented on version 3.0, currently being edited by KM for submission to CER.
- Updates in v3.0 will include:
 - Modifications approved by CER:
 - DS3 Modifications (#22, #23, #24)
 - Distribution Code Review Panel Membership and Constitution Modification (#27)
 - Corrections of typos in v2.0
 - Additional Glossary entries
 - Definitions update
 - General housekeeping and clarifications:
 - Contents table
 - Formatting
 - Tidy up of numbering
 - Supplementary publications in Annex 1
- Commitment made by DH/KM that no material changes will be made to the Code during the housekeeping/formatting work, only to the look and feel.

Conclusion:

- KM to submit a tracked-changes copy of v3.0 to the Secretary, for circulation to the DCRP members ahead of the next meeting.
- v3.0 will be presented to the DCRP by KM at the next meeting.

Minutes of Distribution Code Review Panel Meeting – 1st April 2014

3. Proposed Distribution Code modifications for 2014

- KM presented on the proposed work plan for the Distribution Code.
 - Proposed modifications for 2014:
 - A) Legal Unbundling Modification
 - ESB Networks Limited was incorporated as the licensed Distribution System Operator in 2008.
 - The existing version of the Code does not reflect some of the changes to the structure of the industry
 - B) Definitions clarifications
 - These modifications will be presented during 2014 and will be incorporated into v4.0 (if they are approved). They will not be included in v3.0.
 - Set up expert groups to identify and prepare ongoing modifications regarding the following:
 - Code Structure
 - Modification proposals
 - Grid Code transposition
 - Modifications to be presented to the DCRP based on analysis by KM and expert groups.
 - Development of Code to facilitate IVADN and DS3 programmes.
 - Integration of European Network Codes into Distribution Code while coordinating with EirGrid.
 - Management of derogation process.
- NM suggested that the nature of the Legal Unbundling modification meant that it could be considered for inclusion in v3.0.

Conclusion:

- KM to submit modification proposal for Legal Unbundling.
- KM to submit two tracked-changes copies of v3.0 of the Code:
 - One copy including 2013 modifications and formatting updates (as already noted)
 - One copy that also includes the Legal Unbundling modification changes.
- These will be circulated to the DCRP members by PH.

4. Update on Distribution Code subgroups

a) Modification Proposal #25 (Registered Capacity)

- Subgroup convened by DCRP Chairman and met on 24th March 2014.
- Subgroup members are: Tony Hearne (Chair), Nigel Morris, David Cashman and Ciarán Donnelly.
- TH presented the minutes of the subgroup meeting.
- Issues regarding the inclusion of references to MEC were discussed.
- Issues regarding controllability were discussed:
 - DC: TSO suggest that the 220.466 MW of wind generation between 4.2 MW and 4.999 MW (consisting of 47 windfarms, 9 of which are pre-gate) would need to demonstrate that their windfarm is permanently restricted to below 5 MW.
 - DH: These are not currently controllable, so DSO believes that the modification wording does not introduce change. Concerns may relate to compliance with the Code, rather than the Code itself.

Conclusion:

- Broad agreement on the revised modification wording as proposed by TH, plus the explanatory footnote positioned in Table 5 that references Controllability.

Minutes of Distribution Code Review Panel Meeting – 1st April 2014

- TH to include proposal in new modification form. This will be voted on at the next DCRP meeting.
- The issue of compliance with the Code to be discussed at a future DCRP meeting.

b) Modification Proposal #28 (Distribution Code Modification Implementation Process)

- Subgroup convened by DCRP Chairman and met on 24th March 2014.
- Subgroup members are: Keith Moore (Chair), Nigel Morris, David Cashman and Seán Doolin.
- KM presented the minutes of the subgroup meeting.
- Discussion on the application of retrospection to Distribution Code modifications (proposal states that automatic retrospection is not assumed – the justification for the retrospective/non-retrospective applicability of a modification is to be made by the User/SO proposing the modification):
 - DC: Concerned about divergence between Grid and Distribution Codes ahead of the introduction of the European Network Codes.
Grid Code has assumed retrospection for all modifications – derogations are exceptions.
TSO are not supportive of the proposal that all Distribution Code modifications will not be automatically retrospective.
 - DH: The European Network Codes, when introduced, will work in this manner, i.e. retrospection will not be automatic.
The Distribution Code is not changing from custom and practice, as there have not been many modifications to it over the last number of years.
If the proposal is approved, rather than the onus being on the User to prove that a derogation is warranted, the onus is on the SO/Proposer to prove that retrospection is applicable.
 - NM: May be more efficient to address retrospection at the early stages of a modification proposal.
If the modification is approved, it would be expected that CER would take account of the views of the DCRP on each modification and evaluate the implications of allowing the Distribution and Grid Codes to diverge on a particular topic.
 - CD: What are the implications for IPP compliance testing, i.e. if an IPP is derogated from Distribution Code modification under the new proposal, but not the Grid Code?
DH: For DSO customers, the Operational Cert comes from DSO. Therefore, the understanding is that the Distribution Code applies and no derogation is required from the Grid Code.

Conclusion:

- No consensus reached on the modification proposal.
- DH to incorporate the differing views received from the DCRP members at the meeting with the subgroup minutes. DH to then submit this proposal to CER for decision.

Minutes of Distribution Code Review Panel Meeting – 1st April 2014

5. Update on the implementation of approved modifications #22, #23 and #24.
 - These were approved by CER on 8th October 2013.
 - ESB wrote to all customers affected by the modifications on November 13th 2013.
 - Derogation submission deadline is 8th April 2014 (i.e. 6 months from modification approval).
 - Compliance deadline is 8th October 2014 (i.e. 12 months from modification approval). Anyone tested after this will need to comply with the modifications.
 - One derogation request has been received to date (on 26th March).
 - DH expects more derogation requests before 8th April.

6. Update on CER approval of modification proposals #26 and #27
 - #27 (Distribution Code Review Panel Membership and Constitution) approved by CER on 31st March 2014.
 - #26 (Rate of Change of Frequency Requirements for Users) will be approved by CER following the imminent publication by CER of a further paper on the Grid Code RoCoF modifications.

7. Membership of DCRP
 - PH highlighted that Section 5.3 of The Constitution and Rules of the Distribution Code Review Panel states that each Panel member shall retire automatically at the September meeting each year. The process for re-appointment is also set out.

Conclusion:

 - o PH will notify the Appointers in good time ahead of the September meeting.
 - o PH will update the records concerning each Panel member and nominated alternate.

8. Any other business
 - None

9. Next Meeting Dates:
 - Tuesday 10th June 2014.

**Paul Harrington,
Secretary.**

14th April 2014.