

DISTRIBUTION CODE MODIFICATION PROPOSAL FORM

Modification Proposal submitted By: Tony Hearne Neassa McCabe	DATE OF SUBMISSION OF PROPOSAL: 17.02.2021	Modification Proposal Number: <i>(to be assigned by Review Panel Secretary)</i> #51
CONTACT DETAILS FOR MODIFICATION PROPOSAL ORIGINATOR: (IF NOT DISTRIBUTION CODE REVIEW PANEL		
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MODIFICATION PROPOSAL TITLE:	Adoption of Operational Notification processes as mandated by RfG EU Network Code and adoption of Operational Notification and Compliance processes as mandated by DCC EU Network Code (Articles 31-42)	
DISTRIBUTION CODE SECTION(S) AFFECTED BY PROPOSAL		
<ol style="list-style-type: none">DOC – Creation of new section DOC12 DISTRIBUTION OPERATING CODE – GENERATOR OPERATIONAL NOTIFICATION PROCESSDCC - DCC13.2 – Addition of two new subsections:<ol style="list-style-type: none">13.2.4 Demand Response Operational Notification Process13.2.5 ComplianceDefinitions – Addition of new definitions as required		
MODIFICATION PROPOSAL DESCRIPTION <i>(Clearly state the desired amendment and all text changes. Attach further information if necessary)</i>		
<ol style="list-style-type: none">Creation of a new DOC section DOC12 DISTRIBUTION OPERATING CODE – GENERATOR OPERATIONAL NOTIFICATION PROCESS. See marked up Version 7.0. This new section contains a high-level description of the Operational Notification Process, as it applies to generators, as mandated by the RfG EU Network Code. One point to note. The use of PGMDs is mandated by RfG for Type B and C generators but in the UK and NI jurisdictions, it has been decided to extend the practice to Type D generators as well. This reflects the wishes of industry, where the view was that there was no reason why the additional clarity, should not be applied to Type D generators. This mod proposes to do the same.Creation of New Subsections, 13.2.4 and 13.2.5 See marked up Version 7.0. These sections cover the Operational Notification and Compliance processes as applicable to Demand Units providing a Demand Response Service (when contracted to/ by the DSO), as mandated by the DCC EU Network Code.		

3. New Definitions;

- a. Demand Response Unit Document [DRUD]
- b. Energisation Operational Notification [EON]
- c. Equipment Certificate
- d. Interim Operational Notification [ION]
- e. Final Operational Notification [FON]
- f. Installation Document
- g. Power Generation Module Document
- h. Statement of Compliance

MODIFICATION PROPOSAL JUSTIFICATION *(Clearly state the reason for the modification. Attach further information, if necessary)*

1. The RfG and DCC have now entered into force and are law in Ireland. They must now be reflected in the Distribution Code.
2. Users need to understand what requirements apply to them post adoption of the RfG and DCC.
3. The primary text of the RfG and DCC will remain in place and have primacy over the Distribution Code. However, it is necessary to reflect some relevant requirements in the Distribution Code.
4. The spirit and intent of these structural changes is, to the extent possible, to minimise disruption but capture the relevant content in a meaningful way.
5. The Entry into Force of RfG and DCC is on a non-retrospective basis by default. They enter into force on different dates and hence means must be found to indicate to the reader which clauses apply from which dates. ESB Networks has continued the use of the “incorporative method” for these RfG and DCC requirements, which was initially used to harmonise the RfG requirements with the Distribution Code. This method uses a combination of symbols as well as the enclosing of text in boxes to identify requirements that are: -
 - Applicable to all users
 - Applicable to Non-RfG Generation Units only
 - Applicable to RfG Generation Units only
 - Applicable to Non-DCC Demand Units only
 - Applicable to DCC Demand Units only
6. ESB Networks has updated the formatting and numbering of relevant sections where required.

IMPLICATIONS OF NOT IMPLEMENTING THIS MODIFICATION

1. This is an EU regulation and cannot be ignored.
2. ESB Networks and customers will not be able to comply with EU law.
3. Non-compliance with RfG and DCC. This is the remaining piece of the Connection Network Codes to be adopted.
4. Whilst elements of the Operational Notification practice are already in place for controllable PPMs, the use of PGMDs will bring additional clarity to industry on what actions they need to take and when.

PLEASE SUBMIT MODIFICATION PROPOSALS TO THE PANEL SECRETARY BY E-MAIL TO: DistCodePanel@ESB.ie

