

ADE

No direct comment on D Code text – but some of the comments re aggregators probably need reflecting in D Code approach.

Electricity North West

Question	Answer	D Code response
Do you agree that DNOs should only implement the Demand Response requirements relating to Demand Response Active Power Control and Demand Response Reactive Power Control, recognizing that the other DSR services in Article 27 are services for the Transmission System Operator?	No, agreed that DNOs do not manage frequency (b)(i) demand response system frequency control should be excluded. There is a presumption that very fast active power control is solely to manage frequency, is that definitely the case or are there other potential ? Also under a whole system approach couldn't DNOs/ DSOs procure services for transmission constraint management. These proposals should not prevent such developments if they are in the best interests of consumers.	
Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?	Yes, we do not agree with the proposed approach. The pro-forma document seems to request information that is not specified in Article 32(6). Implementation should focus on doing the minimum to ensure compliance not adding additional regulatory burdens.	

Flexricity

Question	Answer	D Code response
Are the rights and obligations of aggregators appropriately allowed for in the drafting of ECC and DPC9? If not, what additional provisions would you suggest?	<p>The default response time specified in DPC9.3.3.3 is in the frequency response range, rather than active or reactive power DSR range. A default of something along the lines of 5-10 minutes would make more sense.</p> <p>The data specified in DPC9.4.1 being specified one month in advance is fine, but must be</p>	

	<p>implemented correctly for aggregated groups. If new units are added to a group, this should not bar the rest of that group from operation for example.</p> <p>The references to other pieces of EU legislation (EU 2016/631 etc) in the definition of 'Manufacture's information' in DPC9 should be more explicit so that providers are not being made to wade through EU legislation. The paperwork required from providers should be described clearly by the DNO procuring the service in the service contract, rather than sending the provider needing to be versed in EU legislation.</p> <p>There is no mention of aggregators or aggregation in the ECC that I could see, so if there are any, they are difficult to find.</p> <p>7</p> <p>Do you have any comments on the approach taken with the</p> <p>There is no distinction</p>	
<p>Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?</p>	<p>There is no distinction necessary for HV and LV customers.</p> <p>Where is 'fully type tested' defined?</p> <p>The obligations in DSR3 are either excessively complex or poorly expressed. Who will be carrying out these tests for individual sites, how will it be verified?</p> <p>How much manufacturer involvement does ENA actually expect to have in this process? Will there be any incentive for manufacturers to participate, especially considering that DNO DSR is currently rare and made up mostly of short term contracts.</p>	
<p>Do you have any views on how to tailor the</p>	<p>The easiest way to do this is to have the</p>	

<p>compliance process, and documentation, to accommodate both individual Demand Response Service Providers and those Demand Response Service Providers who are aggregators?</p>	<p>compliance and documentation process be on a site by site or unit by unit basis, and then have a secondary process for assigning compliant, documented units or sites to aggregated groups. If the units are not tested and documented individually, the other units in an aggregated portfolio would be forced out of the market every time a new unit joins, or has a temporary outage.</p>	
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SPEN – no specific D Code comments

Northern Powergrid – no specific D Code comments

RWE – no specific D Code comments

SP Generation – no specific D Code comments

SSE

Question	Answer	D Code response
<p>Do you agree that DNOs should only implement the Demand Response requirements relating to Demand Response Active Power Control and Demand Response Reactive Power Control, recognizing that the other DSR services in Article 27 are services for the Transmission System Operator?</p>	<p>The approach to be followed by providers of demand response services should, according to the DCC, be harmonised. We see no recognition of this requirement for harmonisation by the Proposer of GC0104.</p> <p>Without this harmonisation there is a risk that DSR providers have to meet multiple requirements for the same demand modulation depending on whether it is provided to the relevant system operator or relevant TSO.</p> <p>As noted above, this lack of harmonisation in the GC0104 proposal will lead to increased costs for consumers, will not achieve the best social welfare outcome and will not be reasonable, proportionate or efficient.</p>	

<p>Are the rights and obligations of aggregators appropriately allowed for in the drafting of ECC and DPC9? If not, what additional provisions would you suggest?</p>	<p>Given the total lack of detail in this consultation around what the 'Ancillary Services agreement' requires of aggregators; in terms of the DCC; it is difficult to say what the rights and obligations, in totality, are and, therefore, it is difficult to say if this has been suitably allowed for in the drafting of ECC and DCP9.</p>	
<p>Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?</p>	<p>Given that the DCC obligations are to be harmonised then so should the documentation; i.e. it should not matter whether the service is provided to the relevant system operator or the relevant TSO, in both cases the form to be completed should be the same and should only need to be completed once.</p> <p>Notwithstanding the above, we note that the General Data Protection Regulation (GDPR) is due to be applicable in the near future. We notice that the draft installation document contains customer personal data – could the Proposer please confirm, in light of the GDPR obligations, that the proposed installation document is fully compliant with the GDPR obligations.</p>	

Also some of the comments on the Grid Code probably need reflecting in D Code approach.

UK Power Reserve

Question	Answer	D Code response
<p>Do you agree that DNOs should only implement the Demand Response requirements relating to Demand Response Active Power Control and Demand Response Reactive Power Control, recognizing that the other DSR services in Article 27 are services for the Transmission System</p>	<p>Yes, although as the DNO-DSO transition evolves, they should not be precluded from future discussions.</p>	

Operator?		
Do you have any comments on the approach taken with the Installation Document pro-forma proposed for Demand Response services contracted to DNOs? Do you agree that there is no distinction necessary here for HV or LV customers?	UKPR do not see any necessary distinction between LV and HV customers. At the moment, the nature of potential Demand Response services is unclear, but the proforma includes sufficient information.	