

Distribution Code Consultation Response Proforma

DCRP/21/01/PC: G98 / G99 Minor Technical Modification

Stakeholders are invited to respond to this consultation, expressing their views or providing any further evidence on any of the matters contained within the consultation document. Stakeholders are invited to supply the rationale for their responses to the set questions.

Please send your responses and comments by **17:00, 19th March 2021** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/20/06/PC DCode Storage Modification. Please note that any responses received after the deadline may not receive due consideration by the Working Group.

Any queries on the content of the consultation pro-forma should be addressed to DCode Administrator on 020 7706 5105, or to dcode@energynetworks.org

Respondent	Andy Green
Company Name	Baxi Heating UK
No. of DCode Stakeholders Represented	
Stakeholders represented	
Role of Respondent	Technical Director
We intend to publish the consultation responses on the DCode website. Do you agree to this response being published on the DCode website? [Y/N]	Y

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	Question	Response	OBSERVATIONS OF THE SECRETARIAT
Q1	Do you agree with the general intent of the proposed modification? If not, please explain your views.	No, the intent of the document would cease the implementation of microCHP engines on to the network, with regards to the proposed disconnection function	<p>The overall approach has not changed. The implementation of LFSM-O was widely discussed prior to the publication of G98/G99 in 2018.</p> <p>In any event this is a transmission system operator decision; DNOs cannot change this. We will bring your point to the attention of National Grid Electricity System Operator.</p>
Q2	If you have any detailed comments on the proposed drafting, please provide those comments in the proforma provided, or by marking up the consultation drafts of G98 and/or G99.	Comments held within the Proforma	
Q3	Do you have any comments in respect of the inclusion of the references to cyber security.	Yes – see details in the Proforma	
Q4	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	N/A	

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Please provide comments relating to the specific technical content of the proposed modifications¹

Page / line No	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
		8.4.4		We suggest to add the 1:1 replacement of an e.g. defect inverter by a spare part inverter with the same functionality as the old one, because the generator was certified to that as a hole. For this type of replacement no additional certification should be necessary.	Please add a text, so that a 1:1 replacement by a spare part with the same function a new certificate according to G 98 A6 is not required.	No. This goes against the GB principles that where there is significant investment in the plant, it should be brought up to modern standards.
		9.3		For some technologies, such as μ CHP up to 50 kW the droop function is due to its dynamic specification not performable by these generators. The randomized disconnection function provides a comparable droop by the population connected to the grid and contributes by this to the grid stability. To support the high efficient μ CHP technology and therefore to contribute to the CO ₂ reduction we ask to accept one of the proposed modifications to permit randomized disconnection	We suggest to add in 9.3.1, 1 st sentence „according to EN 50549-1” after “... reducing its Active Power output” Or add the following new clause 9.3.5 Alternatively for the droop function described above, the method of randomized disconnection according to EN 50549-1 is permitted	In the RfG this is a TSO set requirement. During the development of G98 and G99 in 2018 NGESO made it clear that this was not to be used in GB. We will bring your response to NGESO’s attention. We assume that your comment is additional to the exemptions that Baxi already has from compliance in this area under the Emerging Technology provisions.
		9.4.1		In Appendix 1, there is a reference to clauses of 9.4.2 and 9.4.3 but these references seems not to updated due to changes made in 9.4	The 2 nd paragraph of 9.4.1 was originally 9.4.2. We assume that an unintended deletion of 9.4.2 has let to this error We suggest to make the 2 nd para of 9.4.1 to 9.4.2 as it was in Amendment 4 version.	Noted – we will correct this. Thank you.

¹ Add more rows if required

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		9.7.1		<p>We are fully aware about the importance to have measures to avoid cyber-attacks, if those can happen due to the connection to the public communication network.</p> <p>From the viewpoint of the generator according to G98, where according to 9.4.2 the input port to cease active power within 5 s does not need to have a communications interface with the risk for a cyber-attack.</p> <p>Furthermore, the document to which is referred to in 9.7.1 “ENA and Department for Business, Energy and Industrial Strategy (BEIS) Distributed Energy Resources (DER) – Cyber Security Connection Guidance” is not applicable for Domestic DER, see 1.2 Scope 1st paragraph.</p>	<p>We suggest to remove this paragraph or to make it clear that this clause is not applicable for the function as specified in 9.4.2 using a input port.</p>	<p>Thank you for your comments. We have currently decided to amend these requirements as per the attachment below.</p> <p>Note that there is a much (or more) risk to manufacturers’ or other third parties’ interaction with the PGM’s settings over the internet rather than the input port (which is not constrained not to be an IP port).</p>

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9.7 Cyber Security

Every **Micro-generator** and any associated equipment must be designed and operated appropriately to ensure cyber security. The **Manufacturer** or **Installer** shall consider all cyber security risks applicable to the **Micro-Generator** both in terms of the communication between any home energy management system etc and also in terms of interaction with any system of the **Manufacturer** for product management.

The **Manufacturer** or **Installer** shall provide information describing the high level cyber security approach, as well as the specific cyber security requirements complied with. The statement will make appropriate reference to the **Micro-generator's** compliance with

- ETSI EN 303 645;
- relevant aspects of PAS 1879 "Energy smart appliances – Demand side response operation – Code of practice;
- relevant aspects of "Distributed Energy Resources – Cyber Security Connection Guidance" published by BEIS and the ENA;
- Any other relevant standard that has been incorporated in the design of the **Micro-Generator**.

Form C

<u>Cyber security</u>	
<u>Confirm that the Manufacturer or Installer of the Micro-generator has provided a statement describing how the Micro-generator has been designed to comply with cyber security requirements, as detailed in 9.7.</u>	<u>Yes / NA</u>