

To the Distribution Code Review Panel Secretary
Energy Networks Association
dcode@energynetworks.org

9 July 2021

Re: Consultation Response DCRP/21/02/PC DCode EREC G100 Issue 2

I hope you will excuse us not using the response pro forma for this consultation. As a small British manufacturing start-up we have limited bandwidth, and have only one key point in the consultation document on which we wish to comment.

Amongst the defects identified in the consultation is *3.9 Multiple Installations*

There is a challenge where a customer wishes to have more than one limiting scheme installed, such as those accompanying electric vehicles and solar generation and battery combination. Such devices are provided by the manufacturers of the main equipment, and are proprietary devices that are generally not compatible. In some cases it might be possible to configure one as the master device and somehow control the others, but this is both complex and cannot be guaranteed.

Caldera's Warmstone heat battery would be such a device. The Warmstone uses electricity to charge when renewables are generating, storing the energy until it is needed to provide domestic heating and hot water. At Caldera we are very aware of the need to stay under the fuse size of a normal connection (G98/G99) or the mode 1 limit for a G100 connection and are putting considerable engineering resources into resolving any potential conflicts with other proprietary devices.

It is proposed that such arrangements cannot in aggregate have capacity more than the mode 2 limits,

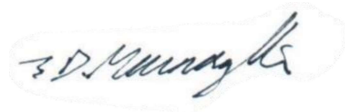
This seems reasonable in theory, but we would be concerned if the mode 2 limit were set at an unreasonably low level.

and also if in aggregate they are of greater capacity than the mode 1 limits, ie import and/or export, then additional fail safe back-up protection should be installed.

We are more concerned by this, as it imposes extra cost and complexity that disincentives the roll-out of low carbon technologies. We have observed that it is common for one household to have multiple devices, and feel the vanguard of early adopters of green technology should be supported not penalised. In addition, clause 4.5.2.1 already allows a maximum of 3 resets over a 30 days period in a domestic installation before going into locked-out mode, and we feel this is sufficient to motivate households, installers and manufacturers to prevent issues without mandating additional back-up protection.

More generally I would argue that changes to the Distribution Code should look for opportunities to support the roll-out of innovative low carbon technologies, and be careful to take a balanced approach to risk mitigation. I would suggest that such an approach is also more in line with Principle 14 of CACoP, through which the Distribution Code is committed to “support prospective energy innovators”.

Yours faithfully,



James Macnaghten
Co-Founder & CEO