Distribution Code Consultation Response Proforma

DCRP/21/02/PC: Distribution Code EREC G100 Issue 2: Technical Requirements for Customers' Export and Import Limitation Schemes

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, 3rd December 2021** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/21/02/PC – EREC G100 Issue 2. 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	*Name*
Company Name	Caldera Heat Batteries Limited
No. of DCode Stakeholders Represented	0
Stakeholders represented	*Please list all Stakeholder names responding on behalf of (including the respondent company if relevant).*
Role of Respondent	*Manufacturer*
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
Q1	Do you agree with the general intent of the proposed modification? If not, please explain your views.	Yes, we support the direction of the proposed modification. We are also thankful for the constructive consultation process.
Q2	Do you agree that the revised EREC G100 should be included in the Distribution Code (as a new requirement by reference in DPC6), be listed in Annex 1 and included under Distribution Code governance in the future?	Unsure – hypothetically this makes sense, but it may mean we are less able to be involved in future changes as we are not a DCode party.
Q3	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	-
Q4	Do you support the formal description of the states of operation and the migration between them?	Yes, this seems reasonable.
Q5	Do you agree with the fail safe approach, and with the excessive state 2 operation criteria? If not, would your propose different criteria?	We are not overly concerned, but the detail still seems unnecessarily prescriptive. 4.5.1.3 does a good job at laying out the penalty for going into state 2. Is that not sufficient in itself? The detail in 4.5.1.2 on wired vs wireless connections seems unnecessary and may soon go out of date?
Q6	Do you agree with the proposed approach to resetting the limitation scheme and recovering from state 3? In particular do you agree that it is appropriate to distinguish the capability to reset the CLS between domestic and commercial/industrial installations? An alternative would be to make a distinction between fully type tested CLSs and those which are not fully type tested; the WG would be interested in views on this.	While the differentiation between domestic and non-domestic installations make sense if starting from first principles it creates an additional burden on the installers to set the correct mode based on the installed location. We would be more comfortable with picking one of the two options and prescribing them for situations. We strongly support 4.9.

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	Question	Response
Q7	Do you agree with the revised design limits? Do you support the thresholds now proposed?	-
Q8	Do you support the approach to communication media? Do you agree with the suggested approach to cyber security?	We feel that the approach the cyber security, while broadly sensible in the abstract, creates an unnecessary burden. If there is a need to require devices connected to the grid and able to be 'remote controlled' to meet certain cyber standards, which may well be sensible, we don't see G100 as the right place to enforce this requirement.
Q9	Do you have any comments on the requirement to monitor the integrity of the secondary circuit of the current transformers used?	-
Q10	Do you support the approach proposed for multiple limitation devices installed in a single premise?	We remain concerned about this: *In some installations **Customers** might want to install more than one **CLS** controlling separate sets of **Devices**. In such cases […] the sum of all the capacities of significant loads and storage (in import mode) **Devices** shall be less than the respective state 2 limits for that installation.* This seems overly restrictive and potentially a significant issue. We deal with domestic customers with potentially high loads from devices such as electric Agas, multiple EV chargers, chemical batteries and in future our own Warmstone heat batteries. We still feel that if the customer's total load can be effectively managed there should be no maximum on the number of devices they are able to have in their home.
Q11	Do you have any comments on the proposals for domestic installations?	Our comments above largely relate to domestic installations.
Q12	Do you have any comments on the proposed type testing regime?	-
Q13	Is there the right balance of principle and detail in Section 5 on testing? Do you have any detailed comments on how testing should be prescribed?	-

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	Question	Response
Q14	Do you agree that the addition Figure 0-1 in the Introduction of EREC G100 aids understanding of the relationship between EREC G100 and flexibility services that the customer might be providing? If not, can you suggest any improvements?	-
Q15	Do you agree with requirement in EREC G100 to only provide a schematic diagram, with any operational diagram for generation remaining to be as specified in EREC G99 (or G98, 59 or 83)?	-
Q16	Do you agree that the 5s period before an excursion into state 2 is registered is appropriate? If not, please state what you think might be an appropriate approach.	Yes
Q17	Do you agree that is appropriate to allow remote resetting of state 3?	Yes
Q18	Do you agree that fully type tested CLSs should be tested at three current settings, viz maximum, minimum and one intermediate point? If not please suggest.	-
Q19	If you have any detailed comments on the proposed drafting, please provide those comments in the proforma provided, or by marking up the consultation draft of G100.	-

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Please provide comments relating to the specific technical content of the proposed modifications[1]

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
						See comments above.

[1] Add more rows if required