

Distribution Code Consultation Response Proforma

DCRP/PC/18/02: Implementation of the EU Network Code Requirements for Generators

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 on 01 February 2018** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/PC/18/03 RfG'. Please note that any responses received after the deadline may not receive due consideration by the DNOs.

Any queries on the content of the consultation pro-forma should be addressed to DCode Administrator on 020 7706 5124, or to dcode@energynetworks.org

Respondent	<i>Name</i>
Company Name	<i>Martin Cottrell</i>
No. of DCode Stakeholders Represented	1
Stakeholders represented	TESLA
Role of Respondent	User
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]	Yes

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	Question	Response
Q1	Comments are welcome on any part of the draft Distribution Code, G98 and G99. Please comment in the manner that is most convenient to you. Specific word templates are available in the consultation pack for making detailed drafting comments on, but please do not feel constrained to use them.	<p>The language of G99 (and G89) describes three operating regimes (eg section 7.1):</p> <ul style="list-style-type: none"> a) Long-term parallel operation b) Infrequent short-term parallel operation c) Switched alternative-only operation. <p>As you know, storage systems are increasingly being designed for long-term parallel operation, but with the facility to swap to providing an alternative supply if/when the grid is lost. This mode of operation isn't really described very well by the above three options – and I think we need to add some notes to describe this at the start of section 7.1 (saying that a system can be designed to switch between modes – its gets clearer the more you read into the document, but it isn't obvious at the start). For “backup-enabled” systems we need to ensure installers know how our grid codes apply and whether to apply the rules for a, b or c (above) and what to do when requirements contradict (which takes priority) – I'm sure we all know what is appropriate, but a fresh reader may not.</p>
Q2	Do you have any general comments on how effectively the RfG requirements have been incorporated into GB documents and is there any aspect that needs modifying before final publication?	
Q3	Are there any comments on the G99 drafting points that are listed in section 2.3.3 above?	
Q4	Do you have any comments on the draft common application form included in the consultation pack, or on the envisaged connexion and compliance assessment process?	
Q5	Please indicate (ASAP, ie before the closing date of 01/02/18 if possible) if you have any views relating to the logic or re-ordering etc of the forms in G99's annexes	

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Q6	Guidance Note 3 in the Distribution Code relating to Stirling engines had expired. It is proposed to extend this now until the RfG is effective from 18/05/19.	
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Please provide comments relating to the specific technical content of the Distribution Code

Page No	Line No	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted

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Please provide comments relating to the specific technical content of EREC G98

Page No	Line No	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted

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Please provide comments relating to the specific technical content of EREC G99

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Page No	Line No	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
45	1151	7.1		E	As you know, storage systems are increasingly being designed for long-term parallel operation, but with the facility to swap to providing an alternative supply if/when the grid is lost. This mode of operation isn't really described very well by the above three options – and I think we need to add some notes to describe this at the start of section 7.1 (saying that a system can be designed to switch between modes – its gets clearer the more you read into the document, but it isn't obvious at the start). For “backup-enabled” systems we need to ensure installers know how our grid codes apply and whether to apply the rules for a, b or c (above) and what to do when requirements contradict (which takes priority) – I’m sure we all know what is appropriate, but a fresh reader may not.		<p>MK Suggestion – add “In the case that a Power Generating Module is designed to switch between these modes of operation, it must be designed to comply with the requirements for each mode.” to the end of 7.1</p> <p>Suggest amend A.4.2 as follows:</p> <p><u>Type A -less than 1 MW:</u></p> <ul style="list-style-type: none"> The constant Active Power output requirement <u>contained</u> in <u>the whole of section</u> 11.2.4; The Limited Frequency Sensitive Mode – Overfrequency requirements <u>contained in the whole of section</u> in 11.2.5; <p>And similar amendments to Types B and C/D</p>

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219	5067	A.4.2		T	<p>For example, line 5067 states as an exemption: <i>“The constant Active Power output requirement in 11.2.4”</i>.</p> <p>➤ <i>I don't think it's clear if this just means 11.2.4.1 (a)</i></p> <p>The same goes for all the other exemptions in this section – I don't think its crystal clear what exactly is not required.</p>		

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Please provide comments relating to the specific technical content and usability of the Standard Application Form

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