

## 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](mailto: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](mailto:dcode@energynetworks.org)

<b>Respondent</b>	<i>Alan Creighton</i>
<b>Company Name</b>	<i>Northern Powergrid</i>
<b>No. of DCode Stakeholders Represented</b>	
<b>Stakeholders represented</b>	
<b>Role of Respondent</b>	<i>Distributor</i>
<b>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]</b>	Y

	Question	Response
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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>Comments, predominantly editorial, provided on copies of the pdf versions of :</p> <p>DCode</p> <p>EREC G98</p> <p>EREC G99</p> <p>A general comment is that consistent use of the terminology 'connected' and 'commissioned' in terms of when the new documents apply would be helpful.</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?	We are of the view that the development of G98 and G99 will significantly assist with the GB implementation of RfG. Both documents have been developed over several months in conjunction with a variety of stakeholders with feedback being used to address stakeholder issues. Hence we are of the view that the documents provide a sound basis for GB implementation of RfG, although given the scope of the change it is likely that further clarification and improvements will need to be incorporated as the documents start to be applied in practice.
Q3	Are there any comments on the G99 drafting points that are listed in section 2.3.3 above?	Re point (d) re automatic reconnection, we agree that the intent remains unchanged, but there is now a requirement for the installation of automatic reconnection equipment to be agreed by the DNO. Our expectation is that this will be included in each connection agreement.
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?	The revised version represents an improvement over the current version, although there are some development required e.g. capturing a customer's import requirement that are still to be incorporated into the final version.
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	The ordering of the forms in G99 seems to be sensible. We have embedded some minor comments in the attached version of G99.
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.	We agree with this proposal.

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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

## Distribution Code Consultation Response Proforma

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

## Distribution Code Consultation Response Proforma

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

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

# Distribution Code Consultation Response Proforma

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

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