

Distribution Code Consultation Response Proforma

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

We have detailed review points below. Nonetheless, **we would like to draw your attention to the following major points:**

- Using *both* “Large/Medium/Small” *and* “Type A/B/C/D” classifications leads to unnecessary confusion and conflict. Please use *only* Type A/B/C/D; *if really necessary* add a single clause which relates Type A/B/C/D to Large/Med/Small for readacross to other documents (e.g. BSC)
- External Active Power Control should be accompanied with a set of other signals for fault investigation, health monitoring, data recording purposes and to avoid unnecessary constraints of Power Generation Facility. This should be recognised in the EREC G99 document.
- Suggest G99 to put responsibility on DNOs to provide detail specification for Operational Metering and external Active Power control requirements to the Generator at the Offer stage.
- Use indent, alphabet and bullets to improve readability

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.

Distribution Code Consultation Response Proforma

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

Company Name	Renewable Energy Systems Limited
No. of DCode Stakeholders Represented	One
Stakeholders represented	Chanura Wijeratne
Role of Respondent	Generator
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

	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.	Please see annotated PDF version of EREC G99 for detail review comments.
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?	No comment
Q3	Are there any comments on the G99 drafting points that are listed in section 2.2.3 above?	Propose to combine External controls (Active Power) and Operational Metering under one heading [e.g. Operational Control and Metering]. The document should identify it is DNO's

Distribution Code Consultation Response Proforma

		responsibility to provide detail specification of 'external control and operational metering signals' at the Offer stage.
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?	Common application form – Not reviewed
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	Comments embedded in the annotated version
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.	No comments

Distribution Code Consultation Response Proforma

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
		Not reviewed. No comments					

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
					Not reviewed. No comments		

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
					Please see annotated PDF version of EREC G99 attached		

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