

Distribution Code Consultation Response Proforma

DCRP/20/06/PC: Distribution Code Storage Modification

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, 12th February 2021** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/20/06/PC DCode Storage Modification'. 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	<i>Chris Yendell</i>
Company Name	Gravitricity Ltd
No. of DCode Stakeholders Represented	1
Stakeholders represented	NA
Role of Respondent	<i>Technology supplier</i>
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.	<p>Unlike EV batteries whose prime aim is to provide a mobile energy source for transport, the purpose of the Gravitricity energy storage system is to provide short-term (up to multiple hours) energy storage in support of the grid. Will there be any financial revenue associated with the provision of this G99 frequency response service, especially the requirement to generate? Is it linked to Dynamic Containment? If not, then this may cut off one of the income streams needed to support development of grid scale energy storage technologies where frequency response is a core part of their service offering. The proposal aims to capture a wide range of energy storage technologies in addition to V2G scenarios. The resulting requirements are not well aligned with all technologies included in the bracket. For example, new market uncertainty is introduced for all technologies captured within this grid code amendment resulting in a potential removal of market incentive for efficient deployment of grid scale energy storage systems.</p> <p>It is the view of Gravitricity that a function to allow Grid scale energy storage units to be compliant with G99 without needing to provide automatic (and potentially and non-revenue generating) frequency services in a defined set of circumstances is required.</p>
Q2	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Technically yes, but at the expense of commercial feasibility to deploy projects.
Q3	Do you agree with the approach to a timed future implementation and do you agree with the suggested date?	No Comment
Q4	Do you agree with the inclusion of mandatory cessation of active power import, and change to generating mode, on falling frequency and do you agree with the thresholds suggested? If you disagree, please explain why.	Gravitricity is broadly in agreement with the technical thresholds in proposal but the idea of mandatory requirements without any obvious re-imbursement does not create the right kind

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	Question	Response
		of market conditions required to allow storage technologies to be encouraged to connect to the grid.
Q5	Do you agree with the general approach taken to V2G requirements? If not, please state what you think is incorrect and inappropriate and please suggest any alternative approaches.	NA
Q6	Do you foresee that V2G will be needed for EVs of under 3.6kW registered generating capacity? If so, this would require appropriate drafting to be included in G98.	NA
Q7	Do you agree that DNOs should insist on formal Equipment Certificates for vehicle manufacturers to demonstrate compliance of V2G capabilities? If you disagree, please explain why.	NA
Q8	Do you have any comments on the proposed EVCP, Heat Pumps, V2G application form (Appendix 3) or the proposed connection process flowchart (Appendix 2) for all domestic customers?	NA
Q9	What do you think of the proposed digitalisation plan outlined in the introduction and do you have any feedback or suggestions on the minimum functional requirements the app should have?	No Comment
Q10	Do you agree that the data requirements relating to storage technologies etc should be left to the DCRP working group [Data Exchange Working Group] on data exchange provisions to resolve?	No Comment

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	Question	Response
Q11	Do you have any comments on the proposed legal text drafting?	No Comment

Please provide comments relating to the specific technical content of the proposed modifications¹

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

¹ Add more rows if required