

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, 9th July** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/21/02/PC DCode 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	<i>Dr Chris Horne</i>
Company Name	<i>Myenergi Ltd</i>
No. of DCode Stakeholders Represented	<i>One</i>
Stakeholders represented	<i>Myenergi Ltd</i>
Role of Respondent	<i>Equipment manufacturer</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]	<i>Yes</i>

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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><i>Partially and with substantial caveats.</i></p> <p><i>We welcome the ambition within the draft G100 to provide a consistent framework for the application of CLS for Domestic Installations. Under current arrangements there is no consistency between the DNO's when considering new EV Charge Point (EVSE) installations, where CLS are allowed within BS7671:2018 Amendment 1:2020 when calculating the maximum demand ahead of installing an EV Charge Point (EVSE). A standard approach, that is simple for installers and customers to apply, is therefore desperately needed.</i></p> <p><i>The proposed guidelines go some way to addressing this need, but require much more consultation as shown by the detailed comments below to remove ambiguity, prevent unnecessary restrictions on the use of the embedded load / generation and to avoid placing a significant burden on the installer when commissioning and registering the CLS.</i></p> <p><i>It is also very important to recognise that the technical considerations for Domestic and Commercial installations are very different and combining them into one document could lead to unnecessary complexity and unexpected / unintended limitations on the CLS.</i></p> <p><i>It is particularly important that the import limitation schemes proposed in the revised G100 do not restrict the ability of Demand Side Response schemes to prevent an overload on DSO assets. The application of current Import Limitation should be restricted to the circuit supplying a single customer / load; extending the principle to the aggregation of loads on a circuit or transformer has the potential to inhibit the application of DSR and to directly conflict with the objectives of PAS1878</i></p> <p><i>We would therefore call for a much longer period of consultation, and wider engagement with key stakeholders, to ensure that the resulting EREC will survive the test of time.</i></p>
Q2	Do you agree that the revised EREC G100 should be included in the Distribution Code Annex 1 and included	<p><i>We are not qualified to respond to this question without further exploring the consequences of including the revised EREC G100 in the Distribution Code Annex 1.</i></p>

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	Question	Response
	under Distribution Code governance in the future? And if not, why not?	
Q3	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	<i>We are not qualified to address the implications of the proposed modifications for commercial installations so cannot answer this question.</i>
Q4	Do you support the formal description of the modes of operation and the migration between them?	<p><i>We understand the reason for wishing to describe the different modes of operation, although there are challenges in domestic installations with this concept when the CLS is actively controlling the load to maintain it within the MIL. The attached paper explains the concerns in more detail, but it is anticipated that, with increasing electrical loads such as EV chargers and heat pumps, that there will be a significant number of domestic CLS that are continuously modulating the mode at the boundary between Mode 1 and Mode 2 – The proposed arrangements to prevent excessive operation in Mode 2 therefore need to further consideration.</i></p> <p><i>We would expect similar issues to be encountered in Commercial Installations.</i></p> <p><i>The application of the MIL for Domestic Installations also needs to be clarified – it is implied that the MIL is set to the rating of the DNO fuse and this needs to be stated explicitly.</i></p>
Q5	Do you agree with the fail-safe approach, and with the excessive mode 2 operation criteria? If not, would you propose different criteria?	<p><i>Partially agree.</i></p> <p><i>Although we understand the requirement to prevent “excessive mode 2 operation” the criteria described in 4.5.1.3 will lead to unacceptable levels of Mode 3 Lock Out if the CLS is “...modulating the consumption and generation of the Devices it controls such that current flowing at the Connection Point remains within that required by the MEL or MIL as appropriate” (4.3.1)</i></p> <p><i>Consider the case for a domestic installation where the MIL is set to 60A and the property has two EV chargers each rated at 32A. If both chargers are in use then the CLS will be continuously modulating the power flowing to the two EV’s along with the normal domestic load to maintain the import current to 60A. Each time the house load changes (eg kettle, oven, washing</i></p>

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	Question	Response
		<p><i>machine etc) the CLS will detect a “Mode 2” condition, even though it will respond immediately to the reduce the excess current.</i></p> <p><i>Although the “8 minutes in 24 hours” rule may not be exceeded, it is very likely that the remaining two rules will be breached, namely:</i></p> <ul style="list-style-type: none"> <i>• There are more than three excursions (each of less than 5 minutes) into mode 2 operation in any 24 hour period; or</i> <i>• The time between any two consecutive mode 2 excursions is 10 minutes or less (measured from the time of re-entry into mode 1 operation from mode 2 operation following the first excursion).</i> <p><i>This is explored in more detail in the attached paper which includes measurements from a domestic installation to illustrate the problem</i></p> <p><i>For domestic CLS we would propose that either:</i></p> <ul style="list-style-type: none"> <i>• only condition 1 applies (ie 8 minutes in 24 hours), or</i> <i>• to prevent an unacceptable number of Mode 3 Lock Outs it is necessary to include a threshold that is breached before the above conditions apply. This threshold should be based both on both:</i> <ul style="list-style-type: none"> <i>○ an absolute limit based on the largest single load that can be switched (eg 32A above the set MEL/MIL); or</i> <i>○ time (eg 15 seconds(*)) – taking into account the fact that the CLS may be modulating the current drawn by EV onboard charging equipment which is required to respond within 5 seconds (IEC 61851-1 Table A.6; Sequence 6))</i> <p><i>Of course the CLS should always react immediately if the MEL/MIL is exceeded – these thresholds are only applicable to the tests for excessive Mode 2 operation.</i></p> <p><i>We would expect similar issues to be encountered in Commercial Installations.</i></p> <p><i>(*) The value of 15 seconds has been suggested based on tests with one EVSE / EV – considerably more work is required to identify an appropriate delay that is suitable for all EVSE/EV’s and other generation, storage devices and controllable loads.</i></p>

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	Question	Response
Q6	Do you agree with the proposed approach to resetting the limitation scheme and recovering from mode 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.	<p><i>Yes – This approach is sensible provided that it is possible for the manufacturer to reset the lock out on a domestic CLS remotely. As the end user will already have reset the CLS three times in 30 days and then needs to involve the installer or manufacturer there will be a strong incentive for them (and the manufacturer) to resolve the problem.</i></p> <p><i>We do not believe it is necessary to differentiate between fully type tested CLS and other CLS.</i></p>
Q7	Do you agree with the design limits? Do you support the thresholds proposed?	<i>Yes – subject to the detailed responses to the other questions in this consultation.</i>
Q8	Do you support the approach to communication media? Do you agree with the suggested approach to cyber security? Given this is a developing area we would particularly like to hear from manufacturers and installers on this point.	<p><i>Partially – Cyber Security is important but the approach needs to be commensurate with the level of risk and, although the standards referenced may be appropriate, other precautions / protections should not be ruled out if the fail safe operation of the CLS can be assure. This is particularly relevant for Type Tested CLS where the protections against cyber attack can be reviewed and agreed.</i></p> <p><i>For instance, in a domestic installation, the security requirements for the communications between components of the CLS do not need to be as onerous as the communications between the components of a CLS managing larger industrial generation and/or load. Similarly the requirements may be less onerous for systems where the communications are effectively isolated and do not rely on internet connectivity (including WiFi)</i></p> <p><i>We would welcome the opportunity to discuss these requirements in more detail as this is a complex subject which requires careful consideration and we have not had the opportunity to fully review all the standards referenced.</i></p>
Q9	Do you have any comments on the requirement to monitor the integrity of the secondary circuit of the current transformers used?	<i>Yes. The current transformer is a critical part of the CLS and the CLS must move to mode 3 if there are any problems with the CT, including</i>

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	Question	Response
		<ul style="list-style-type: none"> - disconnection of the CT (particularly important in domestic installations where the CT will normally be clipped around the meter tail. It is common for the CT to be removed by the meter fitter when meters are replaced or upgraded to smart meters) - disconnection or damage to the secondary wiring from the CT to the CLS control unit <p>As drafted, we believe that the integrity of the CT and secondary wiring are covered by 4.5.1 but this should be made clear</p>
Q10	Do you support the approach proposed for multiple limitation devices installed in a single premise?	<p>No.</p> <p>Provided each CLS separately monitors the current flowing into / out of the installation, we see no reason why the sum of the generation / load needs to be restricted.</p> <p>Where multiple CLS are installed, should the MEL/MIL be exceeded then all the CLS should act to reduce the excursion and the objectives of G100 are achieved.</p> <p>If the proposals to restrict:</p> <ul style="list-style-type: none"> - the sum of all generation + storage in export mode - the sum of all loads + storage in import mode <p>to within the Mode 2 limit are adopted, then surely the CLS is redundant?</p>
Q11	Do you have any comments on the proposals for domestic installations?	<p><u>MIL Values for Domestic CLS</u></p> <p>It is presumed that the proposed values (60A, 80A and 100A) have been chosen to match the rating of the DNO fuse.</p> <p>This should be made clear, and the instruction stated explicitly that the MIL on a Fully Type Tested CLS on Domestic CLS should be set to match the DNO fuse rating.</p> <p><u>Preset MIL/MEL</u></p> <p>In practice, for domestic installations, the MIL/MEL is likely to be built into another product (PV inverter, battery controller, EV charge point, heat pump controller). The text as drafted implies that a Type Tested CLS for Domestic Installations will be supplied with the MEL/MIL set at one of the prescribed values.</p>

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	Question	Response
		<p><i>It is unreasonable to expect equipment manufacturers to produce a range of devices that are pre-set to different MEL/MIL levels as this has a significant impact on stock management, logistics and operating cost. There will also be implications on installers having to carry multiple versions of the same product each with a different MEL/MIL</i></p> <p><i>For the avoidance of doubt, it should be made clear that the manufacturer may offer products with a selectable MEL/MIL limit which is set by the installer.</i></p> <p><i>A CLS with a selectable MEL/MIL should still accepted as a Fully Type Tested CLS</i></p> <p><u>Excessive Mode 2 Operation</u></p> <p><i>Although we understand the requirement to prevent “excessive mode 2 operation”, as drafted, the criteria described in 4.5.1.3 will lead to unacceptable levels of Mode 3 Lock Out if the CLS is “...modulating the consumption and generation of the Devices it controls such that current flowing at the Connection Point remains within that required by the MEL or MIL as appropriate” (4.3.1)</i></p> <p><i>The attached paper describes the problem in more detail and provides a proposal whereby the event is only counted towards the “excessive Mode 2 criteria” after a short time delay or if the MEL/MIL current limit is exceeded by more than the largest single load that can reasonably be expected in a domestic installation</i></p> <p><u>Labelling Requirements</u></p> <p><i>For a Type Tested CLS in a Domestic Installation the requirements in 4.2 for the details of the CLS to be permanently displayed are excessive. An alternative approach using a standard label at the DNO fuse and the consumer unit is proposed.</i></p> <p><u>Voltage Limits</u></p> <p><i>To simplify the requirements for Type Tested CLS in Domestic Installation, it is suggested that:</i></p> <ul style="list-style-type: none"> - <i>The Under voltage limit is only applied when power is being imported</i> - <i>The Over voltage limit is only applied when power is being exported</i> <p><u>Failure Detection</u></p>

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	Question	Response
		<p><i>We believe that “4.5.1.1 Internal Failure” and “4.5.1.2 Internal Failure”, should be strengthened to make it clear that the CLS Components (transducers) include the current transformer used to measure the import/export current. This may seem obvious but in a domestic installation this is likely to be a clip on CT on the wire from the DNO cut out. CT’s are not generally considered to “communicate” with the device that they are connected to so it is unclear if they are covered by 4.5.1.1 or 4.5.1.2</i></p> <p><i>These clip on CT’s are routinely disconnected by meter installers during meter replacements (including the installation of smart meters) and may also be disconnected by the customer or another installer when fitting additional equipment such as a battery or PV panel. If the CT is unclipped from the wire, or is disconnected from the CLS then the CLS must move into mode 3.</i></p> <p><i>The text is also ambiguous on how quickly the internal failure should be detected – Current wording is “Any communication failure shall trigger a move into mode 3 immediately (ie within 5s) after detecting the failure”. We presume that the intention is that the move into mode 3 should occur within 5 seconds of the failure occurring and this should be made clear.</i></p> <p><u>Process</u></p> <p><i>Greater clarity on the process for registering the installation of a Fully Type Tested CLS on a Domestic Installation would be helpful:</i></p> <ul style="list-style-type: none"> - <i>BS7671:2018 Amendment 1:2020 722.311.201 states that “Load curtailment, including load reduction or disconnection, either automatically or manually, may be taken into account when determining maximum demand of the installation or part thereof.”</i> - <i>ENA process for registering EV charge points is “Connect and Notify” provided the aggregate demand is <13.8kVA</i> <p><i>Which implies that prior notification of the CLS for Domestic Installation is not required. However it is unclear in Section 5 of the draft G100 that this is the case.</i></p> <p><i>The process for registering the CLS also needs to be appropriate for the type of installation – for a Domestic Installation, rather than the Customer applying for the approval, it would be more</i></p>

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	Question	Response
		<p><i>appropriate for the Installer to notify the DNO of the details of the Fully Type Tested CLS along with the settings and commissioning record (as part of the Application Form for the Installation of Low Carbon Technologies) rather than submitting G100 documents in addition to the existing Application Form</i></p> <p><u>Commissioning Records</u></p> <p><i>For the commissioning of a Fully Type Tested CLS in a Domestic Installation the requirements in we would suggest that a different commissioning form be provided which lists the failsafe tests required (Table 5.1 Test 1 – 8) rather than referring out to Form B which covers significantly more information and tests which are not needed / relevant. It would be even better if the commissioning records could be incorporated into the Application Form for the Installation of Low Carbon Technologies.</i></p>
Q12	Do you have any comments on the proposed type testing regime?	<p><i>No – other than two places where the text refers to “checking that CLS remains in mode 1” when we believe the CLS should be in mode 2.</i></p> <p><i>Our understanding is that the Manufacturer carries out the type tests and then “self declares” that the CLS complies with the requirements. There is no need for independent / third party testing.</i></p> <p><i>Of the manufacturer wishes to have the CLS listed on the ENA register then they need to submit the relevant form(s) from the appendices along with the results from their type tests.</i></p>
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?	<p><i>On first reading the balance appears correct, however this view may change once practical type testing is carried out.</i></p>
Q14	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.	<p><i>Please see:</i></p> <ul style="list-style-type: none"> - <i>Comments on proforma below</i> - <i>These are included in the marked up copy of the draft G100</i>

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	Question	Response
		<ul style="list-style-type: none">- <i>Paper on the implications of the proposed measures for preventing excessive mode 2 operation when applied to domestic CLS</i>

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

¹ Add more rows if required

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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
	3		Terms and Conditions	With the definition of the MIL state explicitly that, in Domestic Installations, the MIL should be set to match the DNO fuse rating	<p>Update text for MIL as follows:</p> <p>Maximum Import Limit (MIL) The maximum current, as agreed between the Customer and the DNO which may be imported from the Distribution Network via that Connection Point.</p> <p>Note: For Import Limitation the MIL shall be set to rating of the DNO fuse.</p>	

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	4.2		General	<p>For domestic installations further consideration should be given to how the follow requirement should be met “description of the CLS, its controls and settings, and a schematic diagram shall be permanently displayed at the Customer’s site”</p> <p>For example, a CLS built into an EV charger (EVSE) will need:</p> <ul style="list-style-type: none"> - to have a CT connected around the incoming meter tail and - the agreed limit configured <p>Rather than requiring a full description of the CLS maybe it would be sufficient to place a label at the consumer unit and at the DNO fuse indicating:</p> <ul style="list-style-type: none"> - the presence of the CLS - whether it provides export and/or import limits - the MEL / MIL set points. <p>There is precedence for this approach in the labelling requirements for PV systems.</p>	<p>Replace 4.2 paragraph 2 with the following:</p> <p>A description of the CLS, its controls and settings, and a schematic diagram shall be permanently displayed at the Customer’s site. For a Type Tested CLS fitted in a Domestic Installation it is sufficient to place a label at the consumer unit and at the DNO fuse indicating:</p> <ul style="list-style-type: none"> • the presence of the CLS • whether it provides export and/or import limits • the MEL / MIL settings. <p>Examples of the suitable label size, format and wording are included in Annex xxx.</p>	
	4.11		Technical	<p>In practice, for domestic installations, the MIL/MEL is likely to be built into another product (PV inverter, battery controller, EV charge point, heat pump controller). It is unclear from the text if the “preset” value is a single value set in the CLS, or if it is a value set by the installer from an allowed set of MEL/MIL values</p> <p>It is unreasonable to expect equipment manufacturers to produce a range of devices that are pre-set to different MEL/MIL levels</p>	<p>4.11 Domestic Installations</p> <p>The principles and requirements of this EREC G100 shall apply in full to Domestic Installations. It is expected that generally Domestic Installations will comprise Fully Type Tested CLSs.</p> <p>Where a CLS is designed to manage export to the DNOs Distribution Network and is Fully Type Tested the DNO would not expect to witness the installation and operation of the CLS provided either</p>	

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				<p>as this has a significant impact on stock management, logistics and operating cost. There are also implications for installers who would have to carry a number of different versions of the same product when moving from one installation to the next</p> <p>Instead, it should be possible for the manufacturer to offer products with a selectable MEL/MIL limit which is set by the installer.</p> <p>A CLS with a selectable MEL/MIL should still accepted as a Fully Type Tested CLS.</p> <p>It should also be stated explicitly that the MIL for Domestic Installations shall be set to match the DNO fuse rating</p>	<p>a) The mode 1 operating limit is preset with a MEL of 16A, 32A, 60A, 80A or 100A (per phase values), or</p> <p>b) The mode 1 operating limit is set by the installer to a MEL selected from 16A, 32A, 60A, 80A or 100A (per phase values), Once set, adjustment of the MIL should be restricted in accordance with the requirements of 4.2.</p> <p>Where a CLS is designed to manage import to the DNOs Distribution Network and is Fully Type Tested the DNO would not expect to witness the installation and operation of the CLS provided either</p> <p>a) The mode 1 operating limit is preset with a MIL of 60A, 80A or 100A (per phase values), or</p> <p>b) The mode 1 operating limit is set by the installer to a MIL selected from 60A, 80A or 100A (per phase values). Once set, adjustment of the MIL should be restricted in accordance with the requirements of 4.2</p> <p>Note: For Import Limitation the MIL shall be set to rating of the DNO fuse.</p> <p>These principles would also apply where a Fully Type Tested CLS is designed to manage both export to and import from the DNOs Distribution Network.</p> <p>For commissioning Fully Type Tested CLSs the requirements of 5.2 apply.</p>	
	4.5.1.1		Editorial	<p>The requirement to detect within 5 seconds is ambiguous as it leaves the time taken to detect the fault condition open.</p>	<p>Change first sentence of 4.5.1.1 to</p>	

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	3		Terms and Conditions	With the definition of the MIL state explicitly that, in Domestic Installations, the MIL should be set to match the DNO fuse rating	<p>Update text for MIL as follows:</p> <p>Maximum Import Limit (MIL) The maximum current, as agreed between the Customer and the DNO which may be imported from the Distribution Network via that Connection Point.</p> <p>Note: For Import Limitation the MIL shall be set to rating of the DNO fuse.</p>	
					<p>The CLS shall detect any internal failure and move its operation into mode 3 immediately (ie within 5s) after the failure occurs.</p> <p>The same change is suggested for the last sentence of the first paragraph in 4.5.1.2</p>	

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	4.5.1.3		Technical	<p>Although we understand the requirement to prevent “excessive mode 2 operation”, as drafted, the criteria described in 4.5.1.3 will lead to unacceptable levels of Mode 3 Lock Out if the CLS is “...modulating the consumption and generation of the Devices it controls such that current flowing at the Connection Point remains within that required by the MEL or MIL as appropriate” (4.3.1)</p> <p>Consider the case for a domestic installation where the CLS is set to 60A and the property has two EV chargers each rated at 32A. If both chargers are in use then the CLS will be continuously modulating the power flowing to the two EV’s along with the normal domestic load to maintain the import current to 60A. Each time the house load changes (eg kettle, oven, washing machine etc) the CLS will detect a “Mode 2” condition, even though it will respond immediately to the reduce the excess current.</p> <p>Although the “8 minutes in 24 hours” rule may not be exceeded, it is very likely that the remaining two rules will be breached, namely:</p> <ul style="list-style-type: none"> • There are more than three excursions (each of less than 5 minutes) into mode 2 operation in any 24 hour period; or • The time between any two consecutive mode 2 excursions is 10 minutes or less (measured from the time of re-entry into mode 1 	<p>Although mode 2 operation is expected, it is not expected to be frequent. Accordingly if a CLS breaches any of the following criteria, it shall enter mode 3 operation immediately (ie within 5s).</p> <ul style="list-style-type: none"> • The total time in mode 2 operation in any 24 hour period exceeds 8 minutes; • There are more than three excursions (each of less than 5 minutes) into mode 2 operation in any 24 hour period; or • The time between any two consecutive mode 2 excursions is 10 minutes or less (measured from the time of re-entry into mode 1 operation from mode 2 operation following the first excursion). <p>In Domestic Installations where the CLS may be expected to operate close to the MIL/MEL or be actively modulating the generation / load in order to maintain the MIL/MEL then, to avoid the CLS entering mode 3 excessively, the above conditions should only be triggered if the excursion exceeds the MIL/MEL</p> <p>a) for more than 15 seconds; or</p> <p>b) for current excursions, more than 32A</p> <p>The implementation of the necessary counters and timers in the CLS must be done in non-volatile memory so that they are not reset if power to the CLS is lost.</p>	
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				<p>operation from mode 2 operation following the first excursion).</p> <p>This issue is explored further in the technical paper attached to this submission.</p> <p>For domestic CLS we would propose that the requirements in 4.5.1.3 include thresholds that need to be passed before the excursion is counted towards the conditions described to detect excessive Mode 2 operation, namely</p> <p>The time of 10 seconds is proposed to allow the CLS to work with EV onboard charging equipment which is required to respond within 5 seconds (IEC 61851-1 Table A.6; Sequence 6)</p> <p>The proposed thresholds for domestic installations are for the detection of excessive mode 2 excursions only must not delay the control operation of the CLS. In all cases the CLS should act to control the import / export excursion as soon as possible after the excursion occurs.</p>		
	5		General	<p>This section needs to be amended to include a simplified process for the installation of a Fully Type Tested CLS in a Domestic Installation – for instance, rather than submitting a separate form for the CLS, the CLS details, settings and commissioning records could be included as part of an (updated) Application Form for the Installation of Low Carbon Technologies</p>		

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	3		Terms and Conditions	With the definition of the MIL state explicitly that, in Domestic Installations, the MIL should be set to match the DNO fuse rating	Update text for MIL as follows: Maximum Import Limit (MIL) The maximum current, as agreed between the Customer and the DNO which may be imported from the Distribution Network via that Connection Point . Note: For Import Limitation the MIL shall be set to rating of the DNO fuse.	
	5.1		General	For Domestic Installations it would be appropriate for the Installer to submit the required information to the DNO on the Customer's behalf		
	5.6.3.1	Bullet point 2	Technical	The text refers to "checking that the CLS remains in mode 1". However, at this point the injected current is 105% of the limit and the CLS should be in mode 2	<ul style="list-style-type: none"> Step up the current to give a current flow equivalent to 105% of the limit (for Test I), Check that change in level is registered appropriately by the CLS. Check that the CLS remains in mode 1 mode 2. 	
	5.6.3.2	Bullet point 2	Technical	The text refers to "checking that the CLS remains in mode 1". However, at this point the injected current is 105% of the limit and the CLS should be in mode 2	<ul style="list-style-type: none"> Step up the current to give a current flow equivalent to 105% of the limit (for Test I), Check that change in level is registered appropriately by the CLS. Check that the CLS remains in mode 1 mode 2. 	