

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>Euan Taylor and David Porter</i>
Company Name	Fronius UK
No. of DCode Stakeholders Represented	1
Stakeholders represented	<i>Fronius</i>
Role of Respondent	<i>Technical Advisor, Solar inverter 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]	Yes

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	Question	Response
Q1	Do you agree with the general intent of the proposed modification? If not, please explain your views.	Yes
Q2	Do you agree that the revised EREC G100 should be included in the Distribution Code Annex 1 and included under Distribution Code governance in the future? And if not, why not?	Yes
Q3	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Yes
Q4	Do you support the formal description of the modes of operation and the migration between them?	How will the Mode 2 limits be determined, and how will they be regulated? This could mean individual settings per installation which leaves the system open for user error / setup errors.
Q5	Do you agree with the fail-safe approach, and with the excessive mode 2 operation criteria? If not, would you propose different criteria?	Yes, so long as the Limits of Mode 2 are suitably determined so as to prevent nuisance failsafe scenarios.
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.	For systems below a certain threshold eg. 1MW, could this reset be completed Automatically within the equipment, while also issuing an error/warning message to the user? Many Solar sites are remote and unmanned or do not have qualified staff on hand to reset electrical equipment. In these circumstances automatic reset would be beneficial.

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	Question	Response
Q7	Do you agree with the design limits? Do you support the thresholds proposed?	Yes
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.	Agreed that the use of wifi or other wireless technology should be acceptable, these should obviously be stipulated with the same caveat of any loss of communication should result in the generator reverting to zero generation/agreed setback generation. Wireless communications should be over secured media to avoid cyber attack
Q9	Do you have any comments on the requirement to monitor the integrity of the secondary circuit of the current transformers used?	CT disconnection detection should be mandatory to ensure a system does not exceed limits
Q10	Do you support the approach proposed for multiple limitation devices installed in a single premise?	Agree In part, however where equipment is installed through the same manufacturer, or multiple manufacturers using a standardised protocol (Sunspec for solar inverters) which can configure devices together with minimal complexity, then these should be permitted.
Q11	Do you have any comments on the proposals for domestic installations?	Agree that having set standard thresholds should be implemented in order to speed up design acceptance and speed of installation. Resets should be automatic in order to minimise end-user intervention. External reverse power relays should NOT be required for domestic installation. We would recommend allowing generators >44A provided suitable cut out fusing is installed
Q12	Do you have any comments on the proposed type testing regime?	12 months should be allowed for the production of these documents.
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?	Testing complexity for domestic installations should be minimised. Manufacturer-declared devices should be the preferred solution in domestic installations
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.	

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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