

Distribution Code Consultation Response Proforma

DCRP/21/01/PC: G98 / G99 Minor Technical 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, 19th March 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	Bernard Gospel – Technical Secretary
Company Name	AMPS – Association of Manufacturers of Power Generating Systems
No. of DCode Stakeholders Represented	AMPS is the primary Association for Manufacturers and suppliers of Power Systems (generating sets) and ancillary equipment, with 122 members representing 80% of the UK industry.
Stakeholders represented	Please see our website http://www.amps.org.uk
Role of Respondent	UK Generating set manufacturer trade body
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.	
Q2	If you have any detailed comments on the proposed drafting, please provide those comments in the proforma provided, or by marking up the consultation drafts of G98 and/or G99.	See below. We direct our response to G99, although similar comments will apply to the text of G98
Q3	Do you have any comments in respect of the inclusion of the references to cyber security.	See below
Q4	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	

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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
79	9.1.7		General	<p>Removal of cyber security requirement stated in 9.1.7 and related requirements in Annex table referencing 9.1.7 requirements.</p> <p>Justification: Current cyber security requirements, enforces the manufacturer to provide information of compliance to BEIS – cyber security requirement and PAS1879. PAS1879 is intended for use by the TSO and DNO and only of interest to manufacturers of Energy Smart appliances, whilst the NIS document also referred to in correspondence with ENA refers to the operators of essential services. The standards referred to in the PAS document are guidance for an over-arching risk analysis and management of Cyber security threats. Cyber security must be treated as a whole chain solution , with communication protocols, points of attack identified, management of information, passwords, data protection and so on. Cyber security requires an ongoing maintenance of security, involving penetration and other forms of testing</p> <p>It is not clear from both standard what would be required to prove the compliance from a manufacturer of a PGM. It is not clear who would be responsible defining the communication protocols, penetration testing or for updating the software on regular basis. There is more clarity required to be defined to fulfil the cyber security requirements and hence is recommended to be included in the future revision after further discussion between all parties involved.</p>		<p>Thank you for this point – we have decided to revise the wording as the attachment. We believe this mirrors the current parallel requirements being developed with AMPS members in the review of G100.</p>

¹ Add more rows if required

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29	4.1		Editorial / Technical	Definition for fully type tested equipment to be corrected to "A power generating module with a registered capacity >=50kW....." Justification: Currently it appears that the fully type certificate is only applicable for capacity <50kW. Clarity is to be provided that full type certificate is applicable for sets >50kW too."	See comment	The new text is correct, ie as intended. Type tested equipment is either now "type tested" if partially type tested or "fully type tested", as defined. It is not possible to fully type test harmonic compliance for PGMs >50kW. The approach now drafted in G99 was developed in consultation with stakeholders within the DER Technical Forum and explained in 2.4.12 of the consultation paper.
32	4.1		General	Partially type tested definition removed. Proposal is to include the partial type tested definition. It is not clear how the gensets that are not fully compliant, or type tested would be classified as. All reference for partially type tested are removed from the upcoming revision.	See comment	See explanation immediately above.
225	A2		Technical	In section below section it is not clear if the power factor is lag or lead. (type A, page 225)		Lag or lead is not specified as a requirement, so it is not required to be one or the other.

4. Power Factor: The tests should be carried out on a single **Power Generating Module**. Tests are to be carried out at three voltage levels and at **Registered Capacity** ~~and the measured Power Factor must be greater than 0.95 to pass~~. Voltage to be maintained within $\pm 1.5\%$ of the stated level during the test. These tests should be undertaken in accordance with Annex A.7.2.5.2.

Voltage	0.94 pu (216.2 V)	1.0 pu (230 V)	1.1 pu (253 V)
Measured value			

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9.1.7 Every **Power Generating Module** and any associated equipment must be designed and operated appropriately to comply with cyber security requirements. The **Generator** shall consider all cyber security risks applicable to the **Power Generating Module** in terms of the communication between any energy management system etc and also in terms of interaction with any system of the **Manufacturer** for product management.

9.1.8 The **Generator** shall provide information describing the high level cyber security approach, as well as the specific cyber security requirements complied with. The statement will make appropriate reference to the **Power Generating Facilities** compliance with:

- ETSI EN 303 645;
- relevant aspects of PAS 1879 “Energy smart appliances – Demand side response operation – Code of practice”;
- relevant aspects of “Distributed Energy Resources – Cyber Security Connection Guidance” published by BEIS and the ENA;
- Any other relevant standard that has been incorporated in the design of the **Power Generating Module**.

Forms A2-1, A2-2 etc:

14. Cyber security

Confirm that the **Power Generating Module** has been designed to comply with cyber security requirements, as detailed in 9.1.7.

Yes / NA

19 February 2020

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