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	*Andrew Hood*
Company Name	Western Power Distribution
No. of DCode Stakeholders Represented	4 DNO License Areas
Stakeholders represented	*Western Power Distribution*
Role of Respondent	*DNO*
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?	Yes
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
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.	Yes

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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.	Yes
Q9	Do you have any comments on the requirement to monitor the integrity of the secondary circuit of the current transformers used?	No specific comments
Q10	Do you support the approach proposed for multiple limitation devices installed in a single premise?	Yes
Q11	Do you have any comments on the proposals for domestic installations?	No specific comments
Q12	Do you have any comments on the proposed type testing regime?	No specific comments
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?	I am happy with the balance
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.	Detailed comments have been provided below

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Please provide comments relating to the specific technical content of the proposed modifications[1]

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
7	Introduction	3rd para. 1st sent.	G	Consider adding other LCT types	Consider adding electric vehicle charge points	
7	Introduction	5th para	G	Consider adding reference to P29 (unbalance)	Consider adding reference to P29	
8	1	5th para	G	Should 'reverse power protection' be replaced by 'directional overcurrent protection' given that MEL and MIL are current (ampere) values?	Consider replacing 'reverse power' with 'directional overcurrent'	
8	1	5th para	G	Can fuses be considered a type of overload protection? This is not acceptable as their operating currents are typically at least 1.3x rating and they may take several hours to operate for low values of current.	Explicitly prohibit fuses as a form of overload protection	
9	2	Other publications	G	Consider adding a reference to P29 (unbalance)	Consider adding reference to P29	
11	3	Fail Safe	E	Standardise on 'connection' or 'connexion' throughout document. My preference is connection.	Replace 'Connexion Point' with 'Connection Point'	

[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
16	4.4.2		G	The distinction between the Mode 2 operating requirements (i.e. DNO assessment criteria) and the Mode 3 trigger values (CLS settings) is subtle and could be confusing for the reader.	Possibly break 4.4.2 into several sections: e.g. a general section (para 1), 4.4.2.1 Mode 2 Operating Limits: 4.4.2.2 Mode 3 Trigger Levels: In addition, it should be clarified that Import only schemes do not need to cater for over voltage and export only schemes do not need to cater for under voltage	
17	4.5	2nd para	E	revers	reverse	
18	4.5.2	2nd para	E	The following wording could be simplified - 'including through the power supply to the CLS being cycled'	'including where the power supply to the CLS is switched on and off'	
19	4.5.3	2nd para	G	Should 'overload protection' be replaced by 'overcurrent protection', given that MEL and MIL are current (ampere) values?	Consider replacing 'overload protection' with 'overcurrent protection'	
20	4.8	4th para	E	'determining' and 'power flow determination' in the same sentence	Correct typo	
20	4.8	4th para	G	Does the transformer need to be lightly loaded?	Perhaps explain that this ensures the displacement (angle) between the measured voltage and the voltage at the Connection Point remains relatively constant allowing the direction of power flow at the Connection Point to be determined with reasonable accuracy.	
20	4.10	2nd para	G	Should 'overload protection' be replaced by 'overcurrent protection', given that MEL and MIL are current (ampere) values?	Consider replacing 'overload protection' with 'overcurrent protection (which might also need to be directional to cater for import and export limits)'	

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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
31	7	2nd para	G	Does the ENA Type Test Register include provision for CLS? Will this be the case by the time G100/2 is issued?		
33	Appendix A		G	Should the application form include a reference to G100 Issue 2?	Consider adding G100/2 references to the form itself.	
35	Appendix B		G	Should the product information form include references to G100 Issue 2?	Consider adding G100/2 references to the form itself.	
43	Appendix C		G	Should the installation document include references to G100 Issue 2?	Consider adding G100/2 references to the installation document.	