

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>Name</i>
Company Name	BEAMA
No. of DCode Stakeholders Represented	
Stakeholders represented	<i>Please list all Stakeholder names responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Trade Association</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>We agree that there is a need to ensure the integrity of the electricity distribution network, but we are concerned that the proposed modification will have unintended or unforeseen consequences. This is a complex proposal, with significant potential to disrupt the consumer experience, device manufacture requirements, installation and planning. Some aspects, for example type testing, are likely to be particularly onerous for manufacturers who make products for more than just the UK market.</p> <p>The extension of the scope of G100 to include import may constrain consumer use or take-up of EV charging stations and heat pumps, which is not a desirable outcome. The policy intent is for the increased load caused by the electrification of heat and road transport to be managed through DSR (Demand Side Response); this has driven the publication of BSI PAS 1878. But the approach proposed in this consultation does not seem to be sufficiently aligned with this intent.</p> <p>The proposal presents a technical solution but has less to say about the commercial arrangements that would accompany it. For this reason, and for many others, we suggest that stakeholders need more time to understand the implications of the proposal, to form a clearer picture of how it work, and to evaluate whether it would deliver desired outcomes.</p> <p>We recognize that local schemes can affect the electricity distribution network, and that additional methods of control will be required. But the implications of this proposed modification for customers, manufacturers and installers need to be better understood before we give our support.</p> <p>A major concern is how this proposal interacts with the substantial work that is being done on Demand Side Response (DSR) to encourage domestic consumers to partake in the flexibility market. We are concerned that this proposal could restrict consumers' ability to engage with the anticipated flexibility market.</p>

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	Question	Response
		<p>The proposed change to G100 could impose a significant additional burden on manufacturers and installers in comparison to the current scheme. However, we also recognize that additional certainty and confidence associated with these proposals may benefit the sector.</p> <p>Because of the complexity and substantive impacts of these proposals, and because their implications are uncertain, we suggest that a short consultation period of less than a month is not enough time to understand the proposals and form a view. Therefore, BEAMA does not support moving ahead with these at this stage, but instead invites the ENA to join us for a workshop or series of workshops in the coming months to fully understand the proposals, their likely implications for installers, manufacturers and the value chain, the desired outcomes, how the risks will be managed, and also how unintended consequences and inequitable outcomes will be addressed.</p>
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?	We are concerned that the proposed changes will impose a substantial additional burden on installers. At this stage, considering our response to Q1, we do not support its inclusion in the Distribution Code Annex 1.
Q3	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Intentionally left blank
Q4	Do you support the formal description of the modes of operation and the migration between them?	Intentionally left blank
Q5	Do you agree with the fail-safe approach, and with the excessive mode 2 operation criteria? If not, would you propose different criteria?	Intentionally left blank
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	Intentionally left blank

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	Question	Response
	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.	
Q7	Do you agree with the design limits? Do you support the thresholds proposed?	Intentionally left blank
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.	Cyber security is very important and complex, and we suggest that BEAMA-ENA workshops give due consideration to desired cyber security outcomes. The approach should be aligned with Government requirements and with Industry views on how to take forward the relevant parts of PAS 1878.
Q9	Do you have any comments on the requirement to monitor the integrity of the secondary circuit of the current transformers used?	Intentionally left blank
Q10	Do you support the approach proposed for multiple limitation devices installed in a single premise?	Intentionally left blank
Q11	Do you have any comments on the proposals for domestic installations?	Intentionally left blank
Q12	Do you have any comments on the proposed type testing regime?	Intentionally left blank
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?	Intentionally left blank
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.	Intentionally left blank

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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