

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, 3rd December 2021** to dcode@energynetworks.org and please title your email 'Consultation Response DCRP/21/02/PC – 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>Alan Creighton</i>
Company Name	<i>Northern Powergrid</i>
No. of DCode Stakeholders Represented	
Stakeholders represented	
Role of Respondent	<i>Distributor</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>Y</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.	Yes
Q2	Do you agree that the revised EREC G100 should be included in the Distribution Code (as a new requirement by reference in DPC6), be listed in Annex 1 and included under Distribution Code governance in the future?	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 states of operation and the migration between them?	Yes
Q5	Do you agree with the fail safe approach, and with the excessive state 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 state 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
Q7	Do you agree with the revised design limits? Do	Yes

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	Question	Response
	you support the thresholds now proposed?	
Q8	Do you support the approach to communication media? Do you agree with the suggested approach to cyber security?	Yes
Q9	Do you have any comments on the requirement to monitor the integrity of the secondary circuit of the current transformers used?	No
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
Q12	Do you have any comments on the proposed type testing regime?	No, although we have added some comments to the attached version of the draft G100.
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?	Yes
Q14	Do you agree that the addition Figure 0-1 in the Introduction of EREC G100 aids understanding of the relationship between EREC G100 and flexibility services that the customer might be providing? If not, can you suggest any improvements?	Yes. Might it be worth adding a note to the effect that the figure shows different numerical values for the State 1 and State 2 import and export limits as this may be the case, however in many domestic installation the State 1 import and export limits are likely to be the same as are the State 2 import and export limits.
Q15	Do you agree with requirement in EREC G100 to only provide a schematic diagram, with any operational diagram for generation remaining to be as specified in EREC G99 (or G98, 59 or 83)?	Yes

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	Question	Response
Q16	Do you agree that the 5s period before an excursion into state 2 is registered is appropriate? If not, please state what you think might be an appropriate approach.	Yes
Q17	Do you agree that is appropriate to allow remote resetting of state 3?	Yes
Q18	Do you agree that fully type tested CLSs should be tested at three current settings, viz maximum, minimum and one intermediate point? If not please suggest.	Yes
Q19	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.	Please see the attached marked up version of the draft G100 document.

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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
						See comments above.

¹ Add more rows if required