

## DCRP/20/06/PC: Distribution Code Storage 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, 12<sup>th</sup> February 2021** to [dcode@energynetworks.org](mailto: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](mailto:dcode@energynetworks.org)

<b>Respondent</b>	Andy Vaudin
<b>Company Name</b>	EDF Energy Ltd
<b>No. of DCode Stakeholders Represented</b>	1
<b>Stakeholders represented</b>	EDF Energy Ltd
<b>Role of Respondent</b>	<i>Supplier/Generator</i>
<b>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]</b>	y

	Question	Response
Q1	Do you agree with the general intent of the proposed modification? If not, please explain your views.	<i>We agree with the intent of the proposed modification, which will set Distribution Code requirements for Energy Storage to be equivalent to the Grid Code requirements introduced by modification GC0096. This Distribution Code modification is therefore important for system security and for effective competition.</i>
Q2	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	<p><i>We agree that the proposed modifications satisfy Distribution Code Objective (a) and (b):</i></p> <p><i>(a) permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity; and</i></p> <p><i>(b) facilitate competition in the generation and supply of electricity;</i></p> <p><i>The code modifications will provide consistency for developers and manufacturers in the provision of new plant and will help to ensure that new storage plant can contribute to system operability, security and efficiency.</i></p>
Q3	Do you agree with the approach to a timed future implementation and do you agree with the suggested date?	<i>We agree with a timed future implementation approach. The suggested date of 1 September 2022 should allow manufacturers and developers time to implement the new requirements.</i>
Q4	Do you agree with the inclusion of mandatory cessation of active power import, and change to generating mode, on falling frequency and do you agree with the thresholds suggested? If you disagree, please explain why.	<i>We believe that it is appropriate to include mandatory cessation of active power import and potentially change to generating mode on falling frequency because this will contribute to maintaining system security. This requirement and the thresholds to be used should be the same as implemented in the Grid Code.</i>
Q5	Do you agree with the general approach taken to V2G requirements? If not, please state what you think is incorrect and inappropriate and please suggest any alternative approaches.	<i>No response</i>

	Question	Response
Q6	Do you foresee that V2G will be needed for EVs of under 3.6kW registered generating capacity? If so, this would require appropriate drafting to be included in G98.	<i>No response</i>
Q7	Do you agree that DNOs should insist on formal Equipment Certificates for vehicle manufacturers to demonstrate compliance of V2G capabilities? If you disagree, please explain why.	<i>No response</i>
Q8	Do you have any comments on the proposed EVCP, Heat Pumps, V2G application form (Appendix 3) or the proposed connection process flowchart (Appendix 2) for all domestic customers?	<i>No response</i>
Q9	What do you think of the proposed digitalisation plan outlined in the introduction and do you have any feedback or suggestions on the minimum functional requirements the app should have?	<i>No response</i>
Q10	Do you agree that the data requirements relating to storage technologies etc should be left to the DCRP working group [Data Exchange Working Group] on data exchange provisions to resolve?	<i>Agree.</i>
Q11	Do you have any comments on the proposed legal text drafting?	<i>No comments</i>