

# Distribution Code Consultation Response Proforma

## DCRP/20/06/PC: Dcode 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>	<i>Louise Murphy</i>
<b>Company Name</b>	SSE Enterprise
<b>No. of DCode Stakeholders Represented</b>	1
<b>Stakeholders represented</b>	SSE Enterprise
<b>Role of Respondent</b>	<i>other – EV infrastructure developer <sup>1)</sup></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</b>	Yes

<sup>1</sup> Delete as appropriate – please do not use strikethrough, this is to make it easier to analyse the responses

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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 proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Yes
Q3	Do you agree with the approach to a timed future implementation and do you agree with the suggested date?	Yes
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.	Yes, where it doesn't imply excessive complexity or undue cost. For example, at residential/microbusiness premises.
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.	<p>Whilst we agree with the intent of the approach taken to the V2G requirements there are a number of areas where we believe that the approach is incorrect. The principle concern is around the definition of V2G. The definition is not clear and is too wide and will currently cover the everyday driver of many electric vehicles. One of the definitions states</p> <p>'A Vehicle to Grid Electric Vehicle is considered as an Electricity Storage device. Where an electric vehicle and/or its charger have been configured such that the electric vehicle cannot operate as a Vehicle to Grid Electric Vehicle, then it shall be considered as a load and is not included in the requirements of this EREC G99'.</p> <p>This definition will encompass V2G capable vehicles including two of the most popular vehicles like the Nissan leaf and Mitsubishi Outlander as well as future vehicles such as the Honda-E and</p>

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		<p>Fiat 500e and will put the responsibility on the owner/operator to demonstrate that it or its charger has been configured so that the electric vehicle cannot operate as V2G. This appears to be burdensome and inappropriate.</p> <p>In addition, clarity is required on the requirements of 'configured.' What is 'configured' is it software enabled where physical capability is present or is capability of inverter alone sufficient? If a customer says that they don't participate in V2G activity, is this sufficient to demonstrate EV load compliance only?</p> <p>Further clarity is required where there may be facilities that incorporate both V2G and EV charging. In this type of facility would all charging be required to respond to a failing frequency event or only the V2G. Should both be required to respond this will lead different standards across EV charging facilities and in fact in fact this could go as far as discriminating against the use of V2G in commercial locations.</p> <p>An example would be a recent bus depot SSE delivered, where c.20% of the buses are V2G enabled but the majority remain as standard EV buses. What is the V2G and G99 compliant solution for this example? Is it a dedicated G99 protection/equipment that covers the whole site with frequency response across the whole site or only for those V2G vehicles being type tested individually (vehicle/and/or charger) being sufficient for G99 compliance? Our concern is potential undue cost and operational penalty where a site has mixed EV and V2G vehicles.</p>
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.	No, we do not foresee that V2G will be needed for EVs of under 3.6 kW registered generating capacity and agree that V2G should not be included in G98.
Q7	Do you agree that DNOs should insist on formal Equipment Certificates for vehicle manufacturers to	No. In the long term as V2G becomes more established and better understood it will likely be possible to prepare equipment certificates. SSE Enterprise knows directly from our experience with the Innovate UK supported Bus2Grid that vehicle OEM's do not have standardised

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	demonstrate compliance of V2G capabilities? If you disagree, please explain why.	approaches to this space and are still developing capabilities. Basic engineering data can be provided and should be assessed to ensure that this can be developed in the future, but it is too soon now.
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?	No.
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?	No comment to make.
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?	Yes, this would seem appropriate.
Q11	Do you have any comments on the proposed legal text drafting?	No comment to make.

Please provide comments relating to the specific technical content of the proposed modifications<sup>2</sup>

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

<sup>2</sup> Add more rows if required

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