

Distribution Code Consultation Response Proforma

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, 12th February 2021** to 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

Respondent	<i>Graeme Vincent</i>
Company Name	SP Energy Networks
No. of DCode Stakeholders Represented	Two
Stakeholders represented	SP Manweb and SP Distribution
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]	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.	Yes, we agree with the general intent which will treat storage in a similar way to other generation devices.
Q2	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Yes, by removing the exemptions the proposed modifications better satisfies the applicable Distribution Code objectives.
Q3	Do you agree with the approach to a timed future implementation and do you agree with the suggested date?	In order to enable manufacturers and developers to adjust to the new requirements a staged approach seems sensible.
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 as it is a requirement of Commission Regulation (EU) 2017/2196 (Emergency & which is retained EU Law within the UK.
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.	Nil 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.	This may be better left to developers of V2G infrastructure to respond.
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.	Nil response

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	Question	Response
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 additional comments though anything which aids the customer experience should be welcomed.
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?	This seems a sensible approach which would allow alignment and consistency in DNO data reporting requirements.
Q11	Do you have any comments on the proposed legal text drafting?	Only those comments raised below.

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
EREC G98 Page 6	Foreword		Editorial	Addition of (are) to reflect plural device(s)	In this case, the requirement would apply when the Electricity Storage device(s) is (are) operating in import mode.	

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
EREC G99 Page 12	Foreword	Last paragraph	Editorial	Addition of (are) to reflect plural device(s)	In this case, the requirement would apply when the Electricity Storage device(s) is (are) operating in import mode.	
EREC G99 Page 58	6.3.3	F	Editorial	Reference s to figure 6.12 in paragraph and figure) should be referenced 6.13 (Figure 6.12 already exists on Page 55 as an example of scenario 12).	For Power Generating Facilities connected at HV , it is generally necessary to build an equivalent model of the Distribution Network . An example is shown as Figure 6.13 below and Figure 6.13 Example equivalent Total System representation	
EREC G99 Page 138	13.2.3.3		Editorial	Additional space after device	Remove additional space	
EREC G99 Page 140	13.2.5.1	(a)	Editorial	Second reference to figure 13.4, reads Figure 13.34	Change reference to Figure 13.4	
EREC G99 Page 158	13.6.2	(f)	Editorial	Reference should be to 13.16 (b) not 13.165 (b)	Change reference to 13.16 (b)	