

Distribution Code Consultation Response Proforma

DCRP/21/01/PC: G98 / G99 Minor Technical 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, 19th March 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	Helen Stack
Company Name	Centrica
No. of DCode Stakeholders Represented	This response only represents the views of Centrica Business Solutions
Stakeholders represented	Centrica Business Solutions
Role of Respondent	<i>Supplier, Generator, Aggregator and manufacturer of generating plant</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
Q2	If you have any detailed comments on the proposed drafting, please provide those comments in the proforma provided, or by marking up the consultation drafts of G98 and/or G99.	No
Q3	Do you have any comments in respect of the inclusion of the references to cyber security?	<p>We support the principal that all generators should comply with high standards of cyber security but given the new nature of these requirements request that a reasonable time is allowed between confirmation of the requirement and implementation to ensure manufacturers and installers can meet the requirements.</p> <p>We can't see a timeline in the consultation for the implementation date for the cyber security obligations. As the cyber security standard is totally new to this area, we would hope for a sufficiently long run in to confirm compliance.</p> <p>The ENA/BEIS DER Cyber Security Connection Guidance has not been widely promoted to industry, and PAS 1879 is still going through its approval stage and has not yet been published. Publication of PAS 1879 is estimated for May 2021.</p> <p>If the references to cyber security are included at this stage, timing should allow for DNOs to promote awareness of the new requirements with stakeholders and also a reasonable period for stakeholders to prepare for implementation.</p>
Q4	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Yes

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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