

# 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, 19<sup>th</sup> March 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>	Helen Stack
<b>Company Name</b>	Centrica
<b>No. of DCode Stakeholders Represented</b>	This response only represents the views of Centrica Business Solutions
<b>Stakeholders represented</b>	Centrica Business Solutions
<b>Role of Respondent</b>	<i>Supplier, Generator, Aggregator and manufacturer of generating plant</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

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	Question	Response	OBSERVATIONS OF THE SECRETARIAT
Q1	Do you agree with the general intent of the proposed modification? If not, please explain your views.	Yes	Noted, thankyou.
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>	Thank you for your comments. We have currently decided to amend these requirements as per the attachment below.

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	Question	Response	OBSERVATIONS OF THE SECRETARIAT
Q4	Do you agree that the proposed modifications satisfy the applicable Distribution Code objectives? If not, please explain your concerns.	Yes	Noted, thank you.

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9.1.7 Every **Power Generating Module** and any associated equipment must be designed and operated appropriately to comply with cyber security requirements. The **Generator** shall consider all cyber security risks applicable to the **Power Generating Module** in terms of the communication between any energy management system etc and also in terms of interaction with any system of the **Manufacturer** for product management.

9.1.8 The **Generator** shall provide information describing the high level cyber security approach, as well as the specific cyber security requirements complied with. The statement will make appropriate reference to the **Power Generating Facilities** compliance with:

- ETSI EN 303 645;
- relevant aspects of PAS 1879 “Energy smart appliances – Demand side response operation – Code of practice”;
- relevant aspects of “Distributed Energy Resources – Cyber Security Connection Guidance” published by BEIS and the ENA;
- Any other relevant standard that has been incorporated in the design of the **Power Generating Module**.

Forms A2-1, A2-2 etc:

## 14. Cyber security

Confirm that the **Power Generating Module** has been designed to comply with cyber security requirements, as detailed in 9.1.7.

Yes / NA

19 February 2020

DCRP/21/01/PC