

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	Thorsten Bülo
Company Name	SMA Solar Technology AG
No. of DCode Stakeholders Represented	1
Stakeholders represented	1
Role of Respondent	System Development Engineer
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.	Done, please see the comments below
Q3	Do you have any comments in respect of the inclusion of the references to cyber security.	Yes, please see below
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

G99

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.
	6.3.7		Technical	<p>Detailed models for type A PGM are not state of the art (e.g. in Germany, plant modelling is required for PGM>950kW). For PV and storage inverters, there are usually no models for PGUs of a size < 60kW available.</p> <p>This requirement would therefore create new effort for the manufacturers of small devices, not knowing if it will ever be utilized. It's not feasible to make studies with small Type A PGMs and we doubt, that DNOs really would be keen on doing so.</p> <p>For Type A PGMs, project specific modelling effort would significantly increase the cost. Therefore the need for modelling of Type A generators should be omitted.</p> <p>As an alternative, for such necessary cases, a feasible power threshold should be defined, below which models do not have to be provided, to limit uncertainty and avoid unnecessary efforts.</p>	<p>Change 6.3.7 to:</p> <p>"Detailed models of a Type A or Type B Power Generating Module..."</p> <p>Alternative:</p> <p>"Detailed models of a Type A or Type B Power Generating Module are in general not required.</p> <p>Where the DNO deems it necessary to ensure System Stability and security, detailed models of a Type A Power Generating Module with a nominal power >250kW or Type B Power Generating Module are required.</p> <p>Detailed models are always required for Type C and Type D Power Generating Modules."</p>	<p>This is a long standing GB requirement applying to all generation of all sizes. We will reword as:</p> <p><u>In general, detailed models of a Type A or Type B Power Generating Module are not required. wwWhere the DNO deems it necessary to ensure System Stability and security <u>appropriately detailed models of Type A or Type B PGMs shall be supplied.</u></u></p> <p>Detailed models are always required for Type C and Type D Power Generating Modules. Generators shall submit detailed models in respect of Generating Units which are aggregated into a Power Park Module</p>

¹ Add more rows if required

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	9.1.7		General	For several of the requirements defined in the “ENA and Department for Business, Energy and Industrial Strategy (BEIS) Distributed Energy Resources (DER) – Cyber Security Connection Guidance” the scope is unclear (e.g. if the requirement is to be applied to the single devices, the system or the organization of the operator.	Define scope clearly for every requirement.	Thank you for your comments. We have currently decided to amend these requirements as per the attachment below.
	9.1.7		General	Several of the requirements defined in the “ENA and Department for Business, Energy and Industrial Strategy (BEIS) Distributed Energy Resources (DER) – Cyber Security Connection Guidance” are not objectively verifiable and therefore compliance can not be tested.	The requirements have to be formulated in a way, that it's clear, how compliance can be verified.	As above
	9.1.7		General	The referred document “Energy smart appliances – Demand side response operation – Code of practice” is just a draft yet.	The G98 / 99 shall reference only documents, that have a final status. The EREC should only reference to finalized documents.	We expect that all the documents referenced will be final when G99 is republished.

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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:

<u>14. Cyber security</u>	
<u>Confirm that the Power Generating Module has been designed to comply with cyber security requirements, as detailed in 9.1.7.</u>	<u>Yes / NA</u>