DCUSA DCP 205 Consultation Two Follow Up Questions to the Consultation Two Respondents– Collated Comments

Company	1. Does the inclusion of the word 'electricity' prior to the words 'generation equipment' (in Clause 1.30A bullet point two) resolve the issue of the restriction of 16 amperes per phase of all generation equipment?
ENWL	We are happy with the proposed changes.
Heat Pump Association	Yes

Company	2. Are respondents happy with the inclusion of the two standards (set out below) in the DCP 205 legal text to cover harmonics and fluctuation for connections of equipment up to 75 amperes? • **BS EN 61000-3-11 Limits for harmonic current emissions (equipment input current 75 amperes per phase)** • **BS EN 61000-3-12 Limitation of voltage changes, voltage fluctuations and flicker in public low-voltage supply systems, for equipment with rated current 75 amperes per phase).**
BEAMA	I understand from Bean that despite the wording here (which still seems to state explicitly that connecting heat pumps over 16amps will not be fully funded), so long as a heat pump is up to 75amps and does not exceed the 100amp load for the dwelling, it will be fully funded. If it does not mean this and it is expected that customers pay for any heat pump over 16amps whatever the circumstances, this will not meet the intention of the policy. It will also significantly hamper market growth and be a barrier to renewable heat. For information, a simple connect and notify process exists for heat pump connections. It is taking a while to bed in but by April it should be working better. The process is built into MCS which supports RHI.

	Can I please have clarification - in writing - that the wording in the first attachment means heat pumps up to 75amps will not be charged to the customer and will be fully funded by the DNO.
ENWL	We are happy with the proposed changes.
Heat Pump Association	Yes We still have reservations about the responsiveness of DNOs if the process is notify and wait for consent but I understand that others are discussing a notify and install providing the units meet the criteria established in this consultation. Finally, we remain concerned that OFGEM failed to include the costs of three-phase upgrades within the scope of this consultation. Whilst we do not necessarily believe that the total costs for these should be socialised, much greater transparency on what elements of any upgrade cost are single use assets and on the potential proportioning of non-single use assets would be welcome. I shall be raising this topic with the colleagues of Neil Copeland at OFGEM who he has identified as potentially having an interest in this aspect.
Western Power Distribution	<u>Initial Response</u> We CANNOT accept the inclusion of BS EN 61000-3-11 and BS EN 61000-3-12. By including reference to these documents equipment manufacturers and installers will have no financial incentive to provide and install equipment that causes low levels of flicker (voltage disturbances) and harmonics (voltage distortion). If these documents are referenced then cheaper equipment, that produces high levels of flicker or harmonics will be installed in favour of more expensive, less disturbing equipment. By way of example, when heat pumps were first installed in the UK they generally did not come with soft start systems (that reduce their starting current of the pump and hence reduce voltage flicker). In these early days a

	relatively high percentage of proposed heat pump installations required reinforcement to our LV network. Nowadays Installers specify heat pumps with soft start systems which dramatically reduces the need for reinforcement. If BS EN 61000-3-11 and BS EN 61000-3-12 are listed then the wider customer base will end up funding the additional reinforcement costs that will arise from the installation of cheaper, more disturbing equipment. This will lead to a more expensive and under-utilised LV network and will provide little or no benefit to the majority of customers. <u>Second Response</u> We have come up with a compromise, we could possible come to an agreement on the BS standards as follows: If we state “equipment must satisfy BSEN 61000-3-2 and BS EN 61000-3-3” this limits the equipment rating to 16A per phase or less. If instead we state “equipment must satisfy the <u>technical requirements of</u> BSEN 61000-3-2 and BS EN 61000-3-3” this allows equipment with higher ratings to be installed as long as it meets the harmonics and voltage disturbance requirements of those documents.