

Received by email – from British Gas

Dear Gareth,

I am writing to you in response to Ofgem's letter to stakeholders (20th August 2012, ref: 'Connection of Small-Scale Generation - revisions to the Distribution Code to replace Engineering Recommendation G83/1-1 with G83/2').

My apologies for missing your deadline for responses, but I hope you are still able to take our views into account.

Ofgem's open letter states that Ofgem is minded to approve the changes to the Distribution Code that will allow the current version of ER G83/2 to take effect. Within this letter it is acknowledged that 'a specific technology' (Stirling engine micro CHP) would not currently be capable of meeting all of the new requirements.

British Gas are the leading installer of Stirling engine microCHP boilers in the UK:

<http://www.britishgas.co.uk/products-and-services/boilers-and-central-heating/new-boilers/boiler-and-heating-range/baxi-ecogen.html>

We are therefore seriously concerned by the prospect of the proposed ER G83/2 frequency range requirements (47 Hz to 52 Hz) effectively excluding Stirling engine micro CHP units from the market, unless a costly inverter were also fitted. These systems comply with current regulation in the UK and at a European level but their design means that operation outside of 50+/-0.5Hz would lead to unreliable performance and overall less efficient operation. Representation from the Stirling engine micro CHP industry was absent from the G83/2 Working Group and this has resulted in a failure to recognise the implications of the new requirements for this technology group.

A possible means of addressing this could be to make Stirling engine micro CHP exempt from this aspect of the new requirements, as has already been done in Germany in response to a similar issue.

Kind Regards

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Chetan Lad
Head of CERT & Policy
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