



28th September, 2012

Gareth Evans
Head of Profession - Engineering
Ofgem,
9 Millbank
London - SW1P 3GE

Dear Mr. Evans,

This letter is 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'). This 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 and, crucially, also acknowledges that 'a specific technology' (Stirling engine micro CHP) would not currently be capable of meeting all of the new requirements.

The Micropower Council and Combined Heat and Power Association are seriously concerned by the prospect of the proposed ER G83/2 frequency range requirements (47 Hz to 52 Hz) effectively excluding Stirling engine non-inverter connected micro CHP from the market. 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. Unfortunately, the implications for Stirling engine micro CHP were not identified by the G83/2 Working 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. We would welcome the opportunity to discuss our concerns with you in more detail and would be happy to provide any further information that you require.

Yours sincerely,

Dave Sowden
Chief Executive, Micropower Council

Graham Meeks
Director, Combined Heat and Power Association