

Mr Arthur Cooke
Office of Gas and Electricity Markets
9, Millbank
London
SW1P 3GE

Avonbank
Feeder Road
Bristol
BS2 0TB

Telephone 0117 933 2175
Fax 0117 933 2428
Email asleighholm@westernpower.co.uk

Our ref
675 - 22/04/05

Your ref
123/05

Date
18 July 2005

Dear Arthur

The regulatory implications of domestic-scale microgeneration - A consultation document

I am writing further to the publication of the above document in April 2005 on behalf of Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc.

Question 13.2

The technical information held for the existing (import) meter may well not contain details such as whether a reverse running stop is fitted. The only way that this can be checked is a site visit. The obligation should be on the (new) supplier to request his MOA to check the meter is appropriate. For him to know about this, there is some logic in there being an obligation on the customer to tell his supplier he is fitting generation. The difficulty with this is that the import supplier may not be the export supplier. The import supplier is obliged to have an appropriate meter installed (to not run backwards and affect his revenue stream) but gets no recompense to correct the meter when export is installed. Would the customer tell the import supplier about the installation of export when he has contracted with a different supplier for the export?

Question 13.3

The protection requirements of G83 mean that when supply is lost, the generator should not attempt to generate. Therefore, if the prepayment meter "trips" the customer would not get any electricity from his generator. He would therefore be getting no benefit from his installation. He should therefore be encouraged to change to a credit meter arrangement.

Question 13.5

We currently only raise an MPAN if the customer and supplier agree to put any export in to settlements.

Question 13.6

A license obligation seems a bit heavy handed for this. It would be more appropriate for it to be dealt with under the MRA and BSC as it is primarily a matter for Registration, (if the export is to be registered to an MPAN for settlement purposes), or Integrity of Supplier Volume Allocation, (accuracy of metering fitted).

Question 13.7

It would be possible to implement a process whereby the notification of installation of a generator by a customer/installer is forwarded on to the customer's Supplier but this would require changes to systems to flag the presence of a generator associated with the import MPAN and an agreed data flow to the Supplier.

Question 13.8

If the DC output is to be network connected then it needs to pass through an inverter to convert to AC and presumably could be metered there. This seems to be a specific issue when ROCs apply to non-network-connected generation, in which case DC into a DC load may be possible and the lack of approved DC meters becomes an issue.

Question 13.11 General Comments

Any potential obligation on DNOs must be dependent on the customer/installer complying with the requirement to inform the DNO that a generator installation has taken place.

The paper only addresses up to 16 Amp per phase (3.6 kW per phase). There is nothing to stop a DNO agreeing to customer connecting generators greater than this (assuming the customer or contractor is aware he is obliged to contact the DNO in the first place). Multiple G83-compliant generators can be connected in parallel (para 4.7). Settlements has been increased to permit export of up to 30kW Non half hourly.

The paper only considers the option of export registered in settlements (which implies an appointed MOA and requires an export MPAN), or unmeasured spill. A third option not considered is metered but not put through settlements:- The supplier preferring to have an arrangement with the customer to pay for

generated energy outside of settlements. So far in WPD, for all the schemes where a meter has been requested, none have been registered in settlements.

I trust that our comments are helpful, however please feel free to contact either Dave Harris, Tariffs Manager on 0117 933 2219 or myself if you require any further information.

Yours sincerely

ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager