

Notification of Industry Changes – Requirements for Generators – Compliance with the EU Network Code

Briefing Note for manufacturers, installers, developers and owners of new electricity generating equipment of all sizes.

Dear Stakeholder,

The EU Network Code “Requirements for Generators” (RfG) became a legal requirement for all new generation equipment installed in Northern Ireland from 27 April 2019. These requirements have been translated into UK law via the Distribution Code (DCode) and DCode Annex 1 standards EREC G98/NI and EREC G99/NI.

The responsibility for compliance with the law (and hence with G98/NI or G99/NI) is with the connection agreement holder who is generally the owner of the generation. Owners are required to make sure that generation equipment they purchase and install complies with the law.

When the RfG was initially drafted and passed into law by the European Commission, it was anticipated by legislators that 3rd party equipment certification bodies would provide the required confirmation of compliance to industry to ensure generation equipment connecting to electricity networks is compliant with the law. When the new requirements encompassed in G98/NI and G99/NI came into legal effect following the RfG implementation deadline on 27 April 2019, the industry in the UK did not at that time have any 3rd party equipment certification bodies offering these services to the market.

In the absence of a 3rd party equipment certification regime, ENA provides a repository, the ENA Type Test Register, where manufacturers can lodge their own declarations of compliance to G98/NI or G99/NI (www.ena-eng.org/gen-ttr). G98/NI, which applies to domestic scale generation equipment rated at 16 amperes or less, requires that manufacturers must lodge their declarations of compliance in the ENA Type Test Register, but this is not mandatory under G99/NI for any generation equipment larger than 16 amperes.

Please note: ENA is not responsible for the accuracy or validity of the product information held in the register. ENA does not act as an equipment certification body and the presence of a manufacturer’s device on ENA’s Type Test Register does not indicate whether the device is compliant with the required specification or not.

With the increasing up-take in manufacturers registering their equipment on the Type Test Register, Distribution Network Operators (DNOs) and ENA have become aware that many of the declarations of compliance in the register are not complete or appear to have inconsistencies in the information that has been declared as meeting the requirements of G98/NI or G99/NI. As such, it is not possible to say if the generation equipment related to each incomplete declaration is compliant with the law. In response to this observation, ENA has recently initiated a review of the completeness and sensibility of the records in the register. Following the outcome of the review, ENA has flagged up obvious missing information to the relevant manufacturers requesting that they address these issues as a matter of urgency. ENA will be reviewing resubmitted data. Please note that the scope of this review is not a review of the compliance of any generation equipment to G98/NI and G99/NI.

Following on from this initial review, and in the absence of a 3rd party certification regime, DNOs and ENA remain concerned about the compliance of manufacturers' equipment to the new G98/NI and G99/NI. In response to this concern ENA are now considering undertaking a more rigorous review of manufacturers' submissions later in 2019. The review would undertake an assessment on behalf of the DNOs to establish where compliance to G98/NI or G99/NI requirements may be of concern based on the evidence provided by manufacturers. Currently there are over 400 entries in the ENA register and the process of reviewing these manufacturers' submissions is a non-trivial task; ENA and DNOs are considering the most appropriate way of doing this. This review is likely to continue until DNOs are satisfied that there are appropriate 3rd party certification bodies offering adequate service to the market.

The onus is on manufacturers to produce equipment that is compliant with the legal requirements, and upon request (from owners, installers, developers, and DNOs) be able to demonstrate this with appropriate evidence. ENA urge manufacturers to ensure that their generation equipment is demonstrably compliant, as it is in the interests of all their customers, including the supply chain of generation equipment to final owners.

ENA encourages all parties in the supply chain (owners, installers, developers and manufacturers) to maintain a dialogue seeking appropriate assurance and confirmation that generation equipment for the UK market is fully compliant with UK legal requirements. To support a dialogue with stakeholders and DNOs around the connection of generation, ENA hold a Distributed Energy Resources (DER) Technical Forum. This forum is open for all industry stakeholders to query the technical aspects of G98/NI and G99/NI with DNOs to garner a consistent understanding of the implementation by stakeholders and consistent application of the requirements by DNOs. For more information on the DER Technical Forum please [click here](#).

Where generation owners have already bought and installed generation equipment that might be found to be non-compliant, the relevant DNO can be expected to bring this to the attention of the owner in due course, along with any obvious possible mitigations. However mitigations will be the responsibility of the owner and for the owner, installer and manufacturer to address in each case.