

Requirements for Generators Review of Operational Notification Simplification of process for Types A, B and C.

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Stakeholders main concerns re ON



Excessive Operational Notification process for smaller installations:

- ON process massively excessive for Type A
- For Type B still excessive
- Even for Type C the multiple stages of ON could lead to unproductive work.

Difference of opinion on self certification for Type A

- Manufacturers argue if self cert is good enough for safety aspects of LV equipment, why is it not good enough for performance aspects?
- DSOs argue that self cert is not acceptable

Simplified ON proposals under consideration for Types A & B



For Types A and B introduce a dramatically simpler system based on:

Authorised Certifiers issuing **Unit Certificates (UC)**. Covering data, performance and relevant aspects of compliance for a piece of equipment.

Relevant Network Operators (DSOs) preparing simple templates or tick sheets to be used as **Facility Certificates (FC)** covering installation of a module, which could refer to more than one UC.

Site installers fill in the Facility Certificates and they or the owners send these to the RNO.

Owners notify RNO on permanent decommissioning.

One Facility Certificate per installation.

If a second installation made, no responsibility to create an overall site certificate, but instead provide a second Facility Certificate.

Simplified ON proposals under consideration for Type C



For Type C introduce a single stage ON process.

The PGM Owner providing all compliance info including a Statement of Compliance in a **Power Generating Module Certificate**.

One PGMC for each PGM.

If a second installation made, no responsibility to create an overall site certificate, but instead provide a second PGMC.

The RNO on acceptance of the PGMC issues a FON.

More freedom for the RNO to determine content of PGMC (e.g. less details) than for Type D, but this content still subject to Article 4 (3) unlike Facility Certificates for Types A and B.

Discussion points



1. Do the proposals adequately respond to DSO concerns?
2. Do the proposals deliver an acceptable way forward in terms of the difference of opinion between DSOs and manufacturers about need for independent certification, particularly for Type A?
3. If required could a CBA be provided by the DSO EG to defend use of independent certification for LV installations?
4. Does the proposal go too far by allowing Type B to be treated in the same way? What are the main risks?
5. For type C is the single stage process fit for purpose between on the one hand providing assurance of compliance and on the other hand delivering cost effectiveness?