

## Grid Code Administrator Consultation Response Proforma

### GC0143: 'Last resort disconnection of Embedded Generation'

Industry parties are invited to respond to this Code Administrator Consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **17:00** on **5 May 2020** to [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com). Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Modification Report to the Authority.

Any queries on the content of the consultation should be addressed to Christine Brown at [christine.brown1@nationalgrideso.com](mailto:christine.brown1@nationalgrideso.com)

These responses will be included within the Draft Grid Code Modification Report to the Grid Code Panel and within the Final Grid Code Modification Report to the Authority.

<b>Respondent:</b>	<i>Alwyn Poulter</i>
<b>Company Name:</b>	<i>Vattenfall</i>
<b>Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)</b>	<p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none"><li>(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li><li>(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);</li><li>(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;</li><li>(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li></ul>

	(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.
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### Code Administrator Consultation questions

Q	Question	Response
1	<b>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</b>	
2	<b>Do you support the proposed implementation approach?</b>	<p>We recognise the need to bring forward GC0143 and to ensure security of supply during these unprecedented times. We agree with the principle of this modification.</p> <p>However, we believe that in an unlikely scenario where embedded generators are disconnected by DNOs, on the instruction from NGESO, they should be remunerated accordingly (covering electricity price and other scheme payments i.e. ROC or SSFiT). This would ensure a level playing field between BMUs and embedded generators. It is our view that this approach will better ensure effective competition in the generation and supply of electricity. We understand the challenges involved in putting such a process in place in a short timeframe and therefore propose that post event remuneration is considered.</p>
3	<b>Do you have any other comments in relation to GC0143?</b>	<p>We also note that the current drafting does not forewarn embedded generators about possible disconnection, a sudden disconnection could cause operational issues for some embedded generators. We propose that a requirement be included at the end of BC2.9.3.3 that <i>"In any such case the Network Operator will be required to give reasonable notice to the operators of Embedded Power Stations which are to be disconnected to enable a controlled shutdown of the Embedded Power Station"</i>.</p>