

## 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>Rob Jones, Group Environment Manager. 07710 634615. rob.jones@biffa.co.uk</i>
<b>Company Name:</b>	<i>Biffa Waste Services Ltd</i>
<b>Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)</b>	<i>For reference, the Applicable Grid Code objectives are:</i>  (a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity  (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);  (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;  (d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally

	<p>binding decisions of the European Commission and/or the Agency; and</p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.</p>
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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>	No. This will have a significant impact on some smaller generators such as Landfill Gas engines and Anaerobic Digestion facilities as it will also disconnect electricity supply to these sites. As such, all operations will cease and recovery will take a considerable time following reconnection of supply. The cost implications of this are extreme.
2	<b>Do you support the proposed implementation approach?</b>	<p>No. This is extremely alarming and dangerous. The majority of smaller generation sites (Anaerobic Digestion and Landfill sites) only have one main electricity supply (which is used to import and export electricity). If this supply is disconnected all control mechanisms would be immediately turned off and all operations stopped. These control mechanisms are critical to protect the environment and the public. If these control measures cannot be maintained, tens of thousands of cubic metres of biogas will be released to the atmosphere every hour and there will be considerable odour issues in the communities surrounding our sites, not ignoring the significant issue around uncontrolled flammable gas release.</p> <p>Where some sites have back-up generators the position is more positive but there will still be a time delay in bringing these on line and being able to control gas releases. Whilst very undesirable for the business, as no compensation is being proposed (unlike for larger plants that receive curtailment payments), if electrical generation is required to stopped it would be much more sensible to simply request that smaller generators do this themselves. There would still be cost implications but control mechanisms could be maintained to prevent the release of biogas into surrounding communities.</p>
3	<b>Do you have any other comments in relation to GC0143?</b>	None

