

## 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>	Hugh Unwin Mobile: 07929375468 <a href="mailto:hugh.unwin@greencoat-capital.com">hugh.unwin@greencoat-capital.com</a>
<b>Company Name:</b>	Templeborough Biomass Power Plant Ltd
<b>Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)</b>	<p>Templeborough Biomass Power Plant ("TBPP") is a 40MWe waste wood fuelled embedded generator in Rotherham.</p> <p>Clearly this modification and the associated risk of being curtailed without compensation will be of great concern to all embedded generators, but in particular TBPP would like to flag up the following concerns and issues that it has as a large, renewable, thermal, baseload generator:</p> <ol style="list-style-type: none"><li>1. <b>Large thermal mass</b> – it is difficult to turn the plant on/off, or up/down rapidly in response to varying demand on the grid. Whilst the steam turbine does have 100% bypass, this is intended for emergency use only and its use has the potential to create a nuisance for neighbouring residents and businesses</li><li>2. <b>Potential reduced life / increased maintenance cost for turning the plant on/off or up/down too frequently</b> – the thermal stress that is placed on the plant during load changes can reduce the life of certain components, and fouling of the heat exchanger surfaces may be increased during load changes, reducing efficiency and increasing maintenance costs.</li><li>3. <b>Additional fossil fuel use for restarting</b> – every cold restart of the plant requires circa 40,000l of</li></ol>

	<p>diesel fuel to bring the plant up to 850°C before we can commence combusting waste wood (a requirement of the Industrial Emissions Directive and TBPP's Environmental Permit), this significantly undermines the renewable credentials of the plant and its generation.</p> <ol style="list-style-type: none"> <li>4. <b>Baseload generation:</b> the predictability of TBPP's output (compared to intermittent renewable generation) makes it easier to predict and manage its effect on the grid during periods of low demand</li> <li>5. <b>Provider of Inertia:</b> as a synchronous thermal generator, TBPP naturally provides inertia which contributes to grid stability and should presumably therefore be more beneficial to the grid in times of imbalance compared to, say, solar generation.</li> </ol>
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### Code Administrator Consultation questions

Q	Question	Response
1	Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.	
2	Do you support the proposed implementation approach?	
3	Do you have any other comments in relation to GC0143?	