

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. 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

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.

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| Respondent: | <i>Dr. Isaac Gutierrez Lead Electrical Engineer Mobile: 07850539735 Email: igutierrez2@scottishpower.com</i> |
| Company Name: | <i>ScottishPower Renewables (UK) Limited (SPR)</i> |
| Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries) | Please refer to SPR's views in response to Question 1. <i>For reference, the Applicable Grid Code objectives are:</i> <ul style="list-style-type: none">(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 |

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| | <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 |
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| 1 | <p>Do you believe GC0143 better facilitates the Grid Code Objectives?</p> <p>Please include your reasoning.</p> | <p>(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</p> <p>Yes.</p> <p>(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);</p> <p>No – as a stand-alone amendment this is an uncompensated requirement with no criteria identified as to what order generation should be disconnected.</p> <p>(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;</p> <p>Yes.</p> <p>(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</p> <p>No – we believe this, read alongside the Optional Downward Flexibility Management (ODFM) service is a temporary solution and a long-term techno-commercial solution should be implemented with a greater level of</p> |

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| | | <p>consultation and a longer implementation period.</p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.</p> <p>Yes.</p> <p>We believe that NGESO should have anticipated the impacts that the Covid-19 pandemic could have had on the transmission system and the potential for disconnecting Distributed Embedded Generation earlier.</p> <p>It should be noted that, for several years, SPR has been seeking agreement with NGESO in relation to commercial services agreements relating to the capacity of its non-BMU sites and NGESO has not been able to agree upon a suitable set of contract terms for embedded non-BM intermittent generation.</p> <p>SPR recognises that this is now an urgent matter and intends to work with NGESO to establish a workable interim solution, but it is our view that more time for a more detailed consultation and debate on the terms of GC0143 and associated commercial arrangements should have been allowed to properly develop both technical and commercial solutions with the input of all industry stakeholders.</p> |
| 2 | <p>Do you support the proposed implementation approach?</p> | <p>Yes, in the circumstances and on the assumption that our key concerns below are addressed.:</p> <ol style="list-style-type: none"> 1. Alignment of the implementation of GC0143 with NGESO's ODFM programme. It is essential that NGESO ensure that the ODFM is fully operational for all settlement periods in which these new grid code provisions will apply. 2. There is no guidance or transparency on the criteria for disconnecting embedded generation i.e. type of prioritisation. This is unsatisfactory. Both NGESO and DNOs must explain the criteria to use before this modification is implemented. As an example, SPR would expect that, where possible, the de-load would be shared so that the loss of |

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| | | <p>revenue did not just fall on one power station. SPR cannot envisage how NGESO/DNOs can issue instructions without having identified the basis on which the embedded generation will be selected for disconnection. NGESO must commit to refine/define the criteria over a short period of time.</p> <ol style="list-style-type: none"> 3. SPR considers that Emergency Instructions (EIs) should be issued only after commercial avenues have been exhausted and that the legal drafting should explicitly cover this. 4. SPR proposes that NGESO should issue a report every week (until 25th October 2020) detailing all EIs undertaken under this grid code modification and why in their <i>reasonable opinion</i> (as BC2.6.3) these actions were necessary. |
| 3 | Do you have any other comments in relation to GC0143? | <ol style="list-style-type: none"> 1. This is a new type of system defence in terms of the System Defence Plan and Grid Code updates (Modification GC0127). It is disappointing that NGESO did not commence discussions with industry sooner with regard to its requirement to disconnect embedded generators during periods of low demand. We believe this was foreseeable and such an approach would have allowed for a more considered approach than is possible in such short timescales. 2. Will NGESO be issuing an updated System Defence Plan to take account of these changes? 3. It is not clear, following issue of an EI to a DNO by NGESO, when the EI will cease to have effect, i.e. will NGESO issue a further instruction cancelling the initial EI once the situation has resolved itself? 4. “each Control Centre in relation to actions including special actions as set out in BC1.7,”. It is not clear why a reference to BC1.7 has been inserted here when BC1.7 refers to day-ahead actions and not real time ones, this should be clarified by NGESO. 5. It is not clear what expectations NGESO have on the timescales that it is allowable for a DNO to carry out an EI for disconnection. This should be confirmed as soon as possible. 6. It is not clear what the liabilities for failure to comply with an EI are. NGESO should confirm this as soon as possible. 7. Although this modification is considered as last resort, it is not clear whether generators |

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| | | <p>will/could find themselves in a position in which both, ODFM and EIs have been submitted at the same time. It must be confirmed what coordination procedures will be put in place between DNOs and NGESO to avoid any potential overlapping.</p> <p>8. SPR believes it is necessary to confirm how the costs of enacting EIs are to be recovered.</p> |
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