

## 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>Alan Currie</i> <a href="mailto:Alan.currie@ventientenergy.com">Alan.currie@ventientenergy.com</a> 07798770564
<b>Company Name:</b>	<i>Ventient Energy</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	<p><b>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</b></p>	<p>It is our understanding that GC0143 aims to deliver new powers to the ESO, enabling the ESO to instruct DSO's to disconnect embedded generation "as required in an emergency situation and as a last resort" after all other commercially available options through the BM and downward flexibility management have been taken.</p> <p>We wholly support the need to promote grid stability and security of supply but ask that the ESO fully review the risks of emergency disconnections and only utilise this power as a last resort once all other commercially available controlled grid balancing services are exhausted.</p> <p>In light of the grid code objectives to maintain and operate the grid along with promoting security and efficiency of electricity generation we would like to highlight that many generation sites may not react as expected after an emergency disconnect, sites may not automatically come back online impacting security of supply after a low demand event. Due to this affect we ask that the ESO review this risk as part of any last resort disconnection.</p> <p>Facilitating competition in the market and the grid code objective it is imperative that any such emergency disconnection is only taken once all commercially available and controlled grid balancing solutions are exhausted.</p>

Q	Question	Response
2	<p><b>Do you support the proposed implementation approach?</b></p>	<p>No, the implementation timeframe has been too short to allow the embedded generation community to arrange operational and commercial requirements to participate in a controlled balancing mechanism scheme through wider access to the BM or the newly developed ODFM.</p> <p>We support the existing back stop date.</p> <p>As not all embedded generation sites are able to participate in balancing services, we would ask that the ESO implement a financial safety net to protect these sites from potentially substantial negative commercial impacts. As outlined in the grid code section BC2.9.2.5, emergency deenergisation will be paid for in accordance with section 5 of the CUSC which outlines how interruption payments can be made and we believe that a similar compensation mechanism should apply to the embedded generation community affected by GC0143.</p>

Q	Question	Response
3	<p><b>Do you have any other comments in relation to GC0143?</b></p>	<p>Building upon the point raised in Q1, embedded generators may not automatically come back online. This can create both operational and commercial issues for the embedded generator and supply company who are purchasing the forecast power through a PPA. Negative impacts include:</p> <ul style="list-style-type: none"> <li>• Generation and security of supply – longer than required outage – emergency outage may only be required for a three hour period through the night, if site access is required it may take 24 hours or more if multiple sites require manual intervention to bring a site back to operational status.</li> <li>• COVID-19 may also impact on personnel availability to attend sites that need manual intervention.</li> <li>• Commercial impact to the generator with longer than required outage and lost generation revenue.</li> <li>• Supply company, offtaker short in the market if not made whole as done in the BM, negative commercial impact.</li> </ul> <p>We would welcome greater clarity about why the existing powers within the Grid Code are not sufficient.</p>