

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.

Respondent:	James Kerr james.kerr@citizensadvice.org.uk 07880 204110
Company Name:	Citizens Advice
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p>We understand the need for this urgent modification and support, in principle, the time-bound solution.</p> <p>Security is supply is crucial. We agree that both the ESO and DNO's require legal clarity to ensure that consumer supplies are maintained at periods of low demand and high generation.</p> <p>However:</p> <ul style="list-style-type: none">• It is unclear how DNOs will comply with this emergency instruction. In particular, it's not clear whether DNOs are currently able to process and react to these instructions. We would have liked to see an explanation of this process within the modification.• Consumer impact - it's not clear the scale of disruption that consumer may experience if this modification is not implemented.• Why was this mod not raised sooner? We've seen information from the ESO over the last 5-6 weeks of reduced demand related to the coronavirus lockdown, which could potentially lead to consumers supplies being disrupted.

	<p>Therefore this was foreseeable and could have been raised at least 1 month earlier.</p> <ul style="list-style-type: none"> • This solution must be temporary and an enduring solution needs to be developed as quickly as possible that reflects future the relationship between the ESO and DSOs. This needs to be fair for all parties (both transmission and distribution connected) being asked to turn down or off at times of system stress. <p>The legal text defines the end date as ‘until October 25 2020’, but it is not clear whether this means up to and including October 25 2020 or to the end of October 24 2020 or at some point on October 25 2020.</p>
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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.	<p>It has a positive impact on Relevant Objective C.</p> <p>However, this modification does not facilitate effective competition and could result in a scenario where some parties are compensated for turning down or off when other parties are not - therefore it has a negative impact on Relevant Objective B.</p>
2	Do you support the proposed implementation approach?	Yes.
3	Do you have any other comments in relation to GC0143?	No.