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Ecotricity Reference No.: 593
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Ecotricity Response to Consultation on
GC0048 – Requirements for Generators – GB banding Thresholds

Dear Richard Woodward,

Ecotricity is an independent renewable energy generator and supplier, with around 180,000 gas and electricity customers and 81.6MW of renewable capacity including 71 turbines and the country's first large scale solar park. We currently have around 74MW of consented capacity and 240MW in the planning process.

The issue of Generator Requirements is therefore of significant relevance to us and we welcome this opportunity to respond. As this is the case, we have taken on board the consultation questions you have asked and considered them with the following responses.

- 1. From your perspective, which of the banding options presented in the consultation document ('high', 'medium', and 'low' is most suitable to apply in the GB synchronous area for the next three-five years?***

Of the three options presented, the high banding is our preference.

- 2. In respect of your preferred banding option stated in question (i), please can you provide a supporting justification, particularly focusing on quantifying any costs/savings/benefits when it is compared to the other two options presented in this report.***

As a renewable developer, our Power Generating Modules are primarily under 50MW. The higher option will lead to there being less technical requirements to apply to these Power Generating Modules. As this is the case, this will make a higher number of suitable sites economically viable, as it will lead to less costs due to the fact we will not require manufacturers to install more technical capabilities.

If the low option was to apply, our wind farms would fall within category C, which has the technical requirement of frequency response. This is a requirement that is challenging and not adequate due to the variability of wind generation, which is another reason as to why the High Banding is the best possible solution.

From an industry perspective, we would advise that the other options of Medium and Low will be much more expensive for developers to be compliant with, especially when it comes to category C and therefore have a knock on effect on the prices end users have to pay for energy.

3. *How do you believe your preferred banding level facilitates the Grid Code/Distribution Code objectives?*

We believe that our preferred banding level meets objective ii of facilitating competition in the generation and supply of electricity.

4. *Does your preferred banding level adequately protect the interests of all Transmission System and Distribution System Users? If not, why does it fail to do so?*

We believe that DNO's are in a better position to answer this question. As this is the case, we shan't be providing an answer for this question.

5. *Do the proposed banding levels strike an appropriate balance between the needs of the System Operator, Network Operators, Generators and other interested parties? If not, why do they fail to do so?*

We believe that DNO's are in a better position to answer this question. As this is the case, we shan't be providing an answer for this question.

6. *Are there additional considerations for the banding level which the Workgroup has so far not taken account of in this report?*

We have no further additional considerations that the workgroup has not taken into account in this report.

7. *Please provide any other comments you feel are relevant to the proposed change*

We do feel a thorough cost/benefit analysis across the industry will be necessary to support the choice of the banding and generally to ensure that the implementation of the RfG will not leave developers worse off.

Conclusion

Ecotricity would welcome the implementation of the high banding levels, which is the same vision shared by the members of the workgroups for this consultation. As a renewable developer, Power Generation modules are a core part of our development process and if the other banding thresholds were implemented as opposed to the high banding, due to the requirements of the bandings, it

would not just have a significant impact on us, but on the renewable industry as a whole. Therefore, we feel that the high banding will be the best threshold to be implemented.

Ecotricity welcomes the opportunity to respond and hope you take our comments on board. We also welcome any further contact in response to this submission. Please contact Joshua Phelps on 01453 840637 or joshua.phelps@ecotricity.co.uk

Yours sincerely,



Alan Chambers
Acting Compliance Officer