

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:

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Company Name:

Saltend Cogeneration Company Ltd

Please express your views regarding the Code Administrator Consultation, including rationale.

(Please include any issues, suggestions or queries)

For reference, the Applicable Grid Code objectives are:

- (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 binding decisions of the European Commission and/or the Agency; and

(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.

Q1

Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.

We understand the reason that ESO has raised this change and support time limited measures to deal with exceptional circumstances. However, it is a concern that the ESO launched the ODFM service, saying that they had the tools to run the system, then the next day raised an urgent mod. It appears therefore that this is a rushed mod and needs to be replaced by a transparent and robust solution to low demand as quickly as possible, and certainly before October.

Triton believes that as this is an unforeseen emergency situation there may be the alternative option for the ESO to ask that BEIS use the Fuel Security Code either to take off/down a nuclear plant, wind or some solar for a period, with appropriate compensation.

Our key concern is around transparency:

- Triton would expect to see when the actions may be taken, and propose that GC133 implemented so that the state of the system is visible to all;

After last year's power cut, the E3C and Ofgem concluded that the communication with the market around emergency actions must be improved. It is therefore vital that these Grid Code changes are now made in a timely manner so that the whole market is aware of what is going on.

Triton is also concerned by the DNOs ability to instruct plant off under untried powers. We are not aware of any published processes they can use, nor how many MWs they can physically instruct. Triton is concerned that the DNOs have the potential to cause wider system stability issues, that could impact our generation assets or our customers' sites. We note their poor performance in responding to the event of 9/8/19, with poor communication and one DNO bringing demand back before being instructed by the ESO to do so. This does not fill us with confidence and we would want to know that Ofgem is convinced that if it agrees the mod the DNOs can deliver against it in a safe manner.

There are a number of other points we would make about this proposal:

- As a matter of principle we do not support any parties being cut off and not being compensated;
- As well as using emergency powers in the Grid Code, we would like to see some analysis of other options, as the market needs to work together on developing the most robust response to the current situation;

Q2**Do you support the proposed implementation approach?**

It is not clear how implementation does work. The text change is clear, but as noted above how are the market informed of actions, is it the ESO or the DSOs telling us, are there prior warnings, is there a restoration notice, etc? Triton would welcome sight of some additional detail so we understand the processes.

Q3**Do you have any other comments in relation to GC0143?**

Triton hopes the impacted generators are being informed of this change as most are not Grid Code signatories and therefore may be unaware that on Friday they could be asked to shut off under a Code they have never read. The response may not be sufficient if the parties do not know such an instruction could be possible.