

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:	<i>John Hewson MD CLP</i> <i>07341730673</i> <i>jhewson@clpenvirogas.com</i>
Company Name:	<i>CLP Envirogas Ltd</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<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	Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.	
2	Do you support the proposed implementation approach?	<p>No. Because the approach makes no differentiation between the various types of embedded power generation and specifically does not protect those technologies / generating stations that by virtue of their fuel source provide an essential Environmental Service.</p> <p>This flaw in the blanket approach is particularly relevant to those facilities which collect, control and safely destroy environmental pollutants, during the power generation process, notably Landfill Gas stations. LFG is circa 50% methane, (the greenhouse gas properties of which are some 29 times those of CO₂), but may also contain noxious gasses and unpleasant odours, including H₂S, (which is extremely hazardous). Controlling LFG is an essential Environmental Waste Management Service and to compromise that by indiscriminately taking these facilities off-line could have unforeseen environmental repercussions, which could cause the operator to contravene its Environmental Permit, Waste Management Licence, Gas Supply Agreement or other such covenants.</p> <p>CLP operates 20 LFG sites, generating 30MW of power, spread right across the UK from the industrial conurbations of the North West, to the far South West of England and up to the North Eastern tip of Scotland.</p>
3	Do you have any other comments in relation to GC0143?	None