

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:	Ania Vercellotti ania@brightrenewables.co.uk
Company Name:	Community Owned Asset Management Limited
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none">(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.

Code Administrator Consultation questions

Q	Question	Response
1	Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.	We are concerned that this approach could lead to the disconnection of the most cost effective and lowest carbon generation technologies, particularly solar PV, at a time when they are at peak output.

2	<p>Do you support the proposed implementation approach?</p>	<p>We agree and support that action is taken to prevent a blackout or other security of supply issues and appreciate that in these unprecedented circumstances there is need to respond quickly to potential threats to security of supply as and when they arise.</p> <p>However, we note that this code modification is addressing an issue that has already been known about for some time, and we seek additional clarity from the ESO that this last resort approach will not set a precedent for embedded generation going forwards.</p> <p>Further, this modification, though temporary, covers the months when solar PV output is highest and therefore most at risk of being curtailed without compensation. We would welcome and recommend clarity about whether and when the implementation and impact of GC0143 will be reviewed prior to the October sunset date.</p> <p>In addition, this modification raises concerns of an increased burden of both cost and work to the section of the generation market that consists of sufficiently small generators that they do not have remote capabilities to turn off sites and would therefore require operatives to attend to disconnect and reconnect. This is against the principle of “facilitating effective competition in the generation and supply of electricity”, as it places a greater financial burden on smaller generators.</p> <p>We echo the concerns raised by the Grid Code Review Panel that the legal text of this modification provides no safeguard to prevent the ESO from relying upon emergency disconnection of embedded generation as an alternative to reaching a commercial arrangement with generators. Additional clarification is needed to ensure that this does not happen. We urge the ESO to clearly demonstrate how GC0143 will be used only as a "last resort".</p> <p>In relation to the above, we would welcome clarification in the modification that all resource available (subject to location and required demand reduction) for ensuring the “security and efficiency of the electricity generation, transmission and distribution systems” via the Balancing Mechanism (BM) is fully utilised prior to the disconnection of embedded generation for whom there will be no compensation nor recourse by the BM.</p> <p><i>We would like to reiterate our gratitude to the Solar Trade Association for sharing their comments, several of whom's points have been included above.</i></p>
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Q	Question	Response
3	Do you have any other comments in relation to GC0143?	<p>We support the development of a permanent solution to amend any defect in the Grid Code which has been identified. A permanent solution should take into account compensation for impacted generators, and clearly outline under what parameters disconnection would be required.</p> <p>We would also highlight that these stress events underscore the need for National Grid to work closely with Ofgem to implement the necessary regulatory and market reforms to deliver the flexible and resilient networks of the future.</p> <p>In line with the Government's net zero targets, and the ESO's commitment to support 100% zero carbon generation by 2025, we urge that the RIIO2 process and network charging review be targeted to enable the flexibility required support increased zero carbon generation, while maintaining security of supply and delivering benefits for consumers.</p> <p>Additional flexibility markets and mechanisms need to be made available to ensure that all curtailment of embedded generation is compensated. Flexibility markets should include clear decarbonisation targets to support the deployment of the lowest carbon options available.</p> <p>Given the temporary nature of the proposed modification and the necessity for a more long-term change to be implemented to take effect following the 25th October, we would welcome a specific, clear and transparent decision-making process to be followed when choosing the generation to be disconnected. This should take into account the UK government's stated target to bring greenhouse gas emissions to net zero by 2050 and the significant changes this will require in the long-term to the UK's energy mix. As such, we welcome a clear demonstration of the long-term prioritisation of renewable generation following the positive trend we have seen in performance and contribution over recent years.</p> <p><i>We would like to reiterate our gratitude to the Solar Trade Association for sharing their comments, several of whom's points have been included above.</i></p>