

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 Nisar Ahmed 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>Mike Kay</i>
Company Name:	<i>P2 Analysis Ltd</i>
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.
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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.	Yes. There is a risk that has arisen relatively recently, is amplified by current economic and climatic conditions, and is not clearly defrayed in the Grid Code -
2	Do you support the proposed implementation approach?	Yes. The sunset clause is particularly important in bringing forward enduring solutions

3	<p>Do you have any other comments in relation to GC0143?</p>	<p>Yes.</p> <p>The new BC2.9.1.(f) uses the term “disconnection” which is both a Grid Code defined term and a term with the same specific meaning throughout other industry documents. It would be better to phrase the new text as:</p> <p>(f) until October 25 2020, an instruction requiring a Network Operator to disconnect-constrain to zero the output from Embedded Power Stations from their System. For the avoidance of doubt, this includes the disconnection-constraint of Embedded Power Station(s) connected to the Network Operator’s System which are owned or operated by generators that are not BM Participants. Such an instruction may:</p> <ul style="list-style-type: none"> i. be specific and require the Network Operator to disconnect-constrain specified Embedded Power Station(s); ii. be for the Network Operator to disconnect constrain Embedded Power Stations supplied via one or more specified Grid Supply Point(s) with an aggregate Registered Capacity of a specified value; or iii. be for the Network Operator to disconnect constrain Embedded Power Stations supplied via one or more specified Grid Supply Point(s) such that a specified proportion of the aggregate Registered Capacity is disconnected. <p>In any such case the Network Operator will not be required to disconnect-constrain Embedded Power Stations with an aggregated Registered Capacity greater than that of the Embedded Power Stations supplied via the specified Grid Supply Point(s). An instruction from The Company to the Network Operator will be given to commence-reconnectionremove the constraint. Reconnection-Constraint removal shall not take place until such an instruction has been received and be carried out in accordance with the instruction. <u>The Network Operator is free to implement the method of constraint as appropriate to the circumstances, including de-energization.</u></p> <p>An alternative might be to simply replace “disconnect” with “de-energize”. This would be more correct, but still restricts the DNOs’ abilities to implement the instruction in the least disruptive manner.</p>
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