

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:	Chris Welby
Company Name:	Bristol Energy Ltd
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.	<p>Whilst we accept the need for this modification to protect security of supply, the decision not to compensate embedded generators, or suppliers who have contracted for the power and thus face imbalance cost due to non-delivery fails objective (b) as it hinders competition in generation by treating embedded generators differently from BM generators and suppliers, typically smaller suppliers who are more likely to buy from embedded generation.</p> <p>It is also not clear to us from this consultation what the process/criteria will be in deciding which generator to disconnect. Will the process take into account firm & non-firm connection agreements held with DNOs?</p>
2	Do you support the proposed implementation approach?	No. We agree the measure is necessary, but a process of compensation for both the generator and contracted supplier should be available. Due to the urgency, an agreement in principle that compensation should be paid, with details to be agreed would suffice, but to not offer any compensation impacts competition and is thus against objective (b)
3	Do you have any other comments in relation to GC0143?	The sunset clause should be absolute and any alternative or extension should require a new proposal.