

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>Andy Vaudin</i> <i>andrew.vaudin@edfenergy.com</i>
Company Name:	<i>EDF</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

	<p>with the Electricity Regulation and any relevant legally 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.	Modification GC0143 better facilitates objective (iii) “to promote the security and efficiency of the electricity generation, transmission and distribution systems....”, in particular during the current situation of unprecedentedly low national demand due to the Covid-19 lockdown.
2	Do you support the proposed implementation approach?	<p>Yes, based on the ESO advice that without this modification the impact on consumers may be disruption to security of supply, we support the implementation approach of the modification being treated as urgent and implemented before the Bank Holiday on 8 May.</p> <p>We also support the inclusion of the sunset clause, which will time out this modification to the Grid Code on 25 October 2020.</p>

Q	Question	Response
3	Do you have any other comments in relation to GC0143?	<p>It is important that a more considered solution is developed with industry engagement, as intended by the ESO, prior to the sunset clause coming into effect in October 2020.</p> <p>The areas that require further consideration and more detail include:</p> <ul style="list-style-type: none">• The process that would be followed by the ESO before using the new options for Emergency Instructions;• How transparency of the system condition and any actions taken will be communicated;• How this process and transparency of the considered solution will provide confidence that the most appropriate actions have been taken by the ESO leading up to and at the time of emergency circumstances.• The commercial impact on embedded generators affected by emergency disconnection;• The process and the means by which DNOs would action any emergency instruction. (An equivalent modification was presented to the GCRP in 2016, but eventually withdrawn, not least because the controllability of embedded generation by the DNOs could not be demonstrated).