

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>Ben Butler, Group CFO (ben.butler@coryenergy.com, 07825 842 189) 5th Floor, 10 Dominion Street, London, EC2M 2EF</i>
Company Name:	<i>Riverside Resource Recovery Limited (trading as "Cory Riverside Energy" or "Cory")</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;

	<p>(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</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	<p>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</p>	<p>No. Cory believes that this consultation poses a significant risk and disconnection of Embedded Generation should be carried out in a fashion that considers all forms of generation at all levels and based upon their security of supply position rather than the level of connection.</p> <p>In line with the Applicable Code Objective c), those providing the greatest level of security supply, such as waste-fuelled energy generation facilities, should be the last to be disconnected.</p> <p>Moreover, in a context of an environmental and climate emergency, turning off renewable sources of electricity to support fossil-fuelled baseload generation cannot be the correct form of action.</p> <p>We are aware that the Environmental Services Association has also made a submission to the consultation. We support their position.</p>

2	<p>Do you support the proposed implementation approach?</p>	<p>No, Cory believes that the proposed implementation approach poses significant economic risks for our business and the waste and resources industry more generally. We also believe that it poses significant public health and environmental risks.</p> <p>The proposal represents a significant commercial risk for our business as section 6 implies that an embedded generator that is switched off through this mechanism will not be compensated, unlike larger plants that receive curtailment payments.</p> <p>We are concerned that an unplanned disconnection of our Riverside Energy from Waste plant from the distribution network would cause a site blackout, which may be restored in seconds, minutes, or take several hours depending on many factors. This poses many risks both to the safe operation of our plant and is likely to have very significant adverse financial consequences for our business, for which no compensation mechanism is proposed.</p> <p>Any blackout will cause an unplanned shutdown of the boilers and is likely to result in a period of increased emissions of CO, TOC, and dioxins and furans while waste burns on the grate without sufficient air for complete combustion.</p> <p>Moreover, disconnection of our plant could affect the stability of combustion, and, in more serious scenarios, cause large-scale and lasting damage. This will mean we are unable to process as much residual waste meaning that more waste will ultimately need to be disposed of to landfill – with all of the negative impacts for the environment and public health that entails.</p> <p>Our EfW plant provides an important service to distribution network operators (DNOs) allowing them to regulate system voltage in local networks in a similar fashion to that of the Transmission connected larger generators, therefore providing greater stability to the grid.</p> <p>We are unclear as to the mechanism that ESO or our DNO (UK Power Networks) would use to communicate a disconnection. We are very concerned that there is insufficient infrastructure in place to properly manage a large scale turn down of embedded generation. This may mean that there is insufficient warning of a disconnection</p>
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Q	Question	Response
		<p>event leading to a rapid disconnection of our plant from the network, which poses a very substantial risk to the safe operation of our plant, and is likely to cause significant and lasting damage to the plant – requiring heightened repair and maintenance costs, and the loss of future plant availability. It may also lead DNO's to 'cherry pick' certain larger generators from within their network, as they are unable to efficiently communicate with a large number of embedded generators – which would lead to an inherent unfairness and distortion between larger and smaller embedded generators, as it is likely that DNOs will target larger generators, such as ourselves, in order reduce the burden of communication.</p>
3	<p>Do you have any other comments in relation to GC0143?</p>	<p>No</p>