

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>Peter Wood</i>
Company Name:	<i>British Steel</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.
--	---

Code Administrator Consultation questions

Q	Question	Response
1	Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.	
2	Do you support the proposed implementation approach?	

Q	Question	Response
3	<p>Do you have any other comments in relation to GC0143?</p>	<p>British Steel operates a number of sites, the majority load, but its main site in Scunthorpe is a mixed with c60% (c50MW) of its load supplied from Northern Powergrid's distribution network and the balance supplied from behind the meter embedded generation (steam turbo-alternators). This site is also a COMAH Tier 1 site and therefore availability of power is essential to its safe operation.</p> <p>Whilst acknowledging the challenges faced in managing periods of low demand and the need for procedures to put in place to manage all eventualities I would request that the modification requires DNO's to take an enlightened approach to disconnection, with generation sites being disconnected ahead of mixed sites, especially those that are typically load. In fact a disconnection of a site such as British Steel's Scunthorpe site could exacerbate an already difficult situation.</p> <p>British Steel, as no doubt other mixed sites with embedded generation will do, is willing to engage constructively with DNO's to manage its generation and load during critical periods to help maintain broader network stability, and I suggest this approach should be included within the modification.</p> <p>Finally I am aware of the ESO's Optional Downward Flexibility product and British Steel shall review how it can participate to reduce the likelihood of the situation covered in mod GC0143.</p>