

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>Georgina Penfold</i> georgina@theicon.org.uk 07515 452 356
Company Name:	<i>Industrial & Commercial Operations Network</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; (d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally

	<p>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>As a temporary measure, this proposal does make sense as it clarifies the legal right of the DNOs to help manage the system as a last resort.</p> <p>However urgent obligations are needed on the DNOs to design and communicate a hierarchy for disconnection in order to protect those sites which would equally receive protection under the low frequency demand disconnection.</p>
2	<p>Do you support the proposed implementation approach?</p>	<p>Whilst this is being processed exceedingly quickly, the reasons for this urgency are clear and this does make sense.</p> <p>However, in passing this modification we would want to see an obligation made on the DNOs to develop a plan for how and in what order assets can be disconnected.</p> <p>Switching off generators which serve demand users would not only fail to achieve the aim of balancing demand and supply but may also cause critical damage to industrial or public infrastructure.</p> <p>This script should be developed as soon as possible and the DNOs must be required to engage proactively with their distributed energy resources to determine the sites which must be protected.</p>

Q	Question	Response
3	Do you have any other comments in relation to GC0143?	<p>There needs to be a hierarchy in place that determines in which order assets are switched off.</p> <p>For example, owners of assets that are passive generators should be disconnected before any asset that may be used to provide power to industrial processes.</p> <p>Public utilities, hospitals and other sites which would be protected from demand turn-off actions must be protected from such actions.</p>