

## 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](mailto: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](mailto: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.

<b>Respondent:</b>	<i>Oliver Zhe Xing</i> <a href="mailto:olixi@orsted.co.uk">olixi@orsted.co.uk</a> 07879697812
<b>Company Name:</b>	<i>Ørsted</i>
<b>Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)</b>	<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	<b>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</b>	<p>We support this urgent modification to be made as the energy industry goes through the COVID-19 pandemic period. We believe that maintaining security of supply is a priority for all. Therefore, the modification will be beneficial to objectives (c).</p>
2	<b>Do you support the proposed implementation approach?</b>	<p>We support the proposal to be implemented in a timely manner to mitigate any potential system risks.</p> <p>However, since the industry does not get enough time to discuss and implement the full set of solutions due to the urgency, we urge National Grid to only use this solution when all other commercial solutions are exhausted.</p> <p>We remain concerned about the financial detriment to embedded generators and the relevant energy suppliers due to their imbalance positions not being corrected. We learnt that Elexon will not be raising a modification for this purpose.</p> <p>Whilst we do not expect misuse of the powers provided by GC0143 and welcome its time-limited nature, should use of disconnection occur ahead of commercial solutions, there may be unintended consequences for suppliers, many of whom are already struggling financially due to the COVID-19.</p>
3	<b>Do you have any other comments in relation to GC0143?</b>	No