

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>Alan Chambers – 01453 761 380, alan.chambers@ecotricity.co.uk</i>
Company Name:	<i>Ecotricity</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.
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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.	No. This change would lower investor confidence in generation that is not part of a BM unit. This would be to the detriment of objectives (a) and (b).
2	Do you support the proposed implementation approach?	No. Compensation to embedded generators would need to be arranged before it could be implemented which is not possible at such short notice. The proposed short-term nature of the proposed change is dangerous as it can set a precedent that has not been fully thought through.

Q	Question	Response
3	<p>Do you have any other comments in relation to GC0143?</p>	<p>Given the circumstances, the grid should be allowed to quickly disconnect embedded generation as an action of last resort. However, if this happens, embedded generation should be refunded with the payment expected for any such action.</p> <p>Or, more wisely, the grid could start new services for embedded generation, for example:</p> <ul style="list-style-type: none"> - Run an auction where embedded generation “opts in” with a disconnection price. The grid would procure capacity, and then pay the disconnection fee (e.g. pay as clear to keep it simple) whenever it turns off generation. - Procure a generation turn-off service. It’s already happened in the past with DTU. - Run a parallel “embedded BM”. Plants would submit a bid price once. If the grid disconnected them, it would pay that price. <p>The volume of embedded generation is negligible compared to the renewable generation in the BM, even when it’s extremely sunny and windy. The grid can always turn off renewable plants in the BM, although this can be expensive for them.</p> <p>Care should be given to ensure that if this is brought in without compensation, that the same approach is not seen as valid in other areas ie. curtailment of EV charges.</p> <p>Embedded benefits have been significantly eroded in recent years and this would further disadvantage embedded generators.</p>