

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>Graeme Vincent</i> <i>graeme.vincent@spenergynetworks.co.uk</i>
Company Name:	<i>SP Energy Networks</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 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	<p>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</p>	<p>We believe that GC0143 better facilitates Grid Code Objective (c) and is neutral in respect of the others. We believe that this modification will give the ESO a means of last resort, to ensure the integrity of the NETS arising from an excess amount of embedded generation. We note that it will only be used should NGENSO exhaust all commercial routes available to it in managing the situation of excess generation.</p>
2	<p>Do you support the proposed implementation approach?</p>	<p>Yes, we support the planned implementation approach given the risks which have been identified to the security of the NETS and the timescales in which these may materialise.</p>
3	<p>Do you have any other comments in relation to GC0143?</p>	<p>Whilst we acknowledge the urgent timescales in which this modification has been brought forward and that a 'sunset clause' has been introduced so that a future modification in this area can be brought forward under normal Grid Code Governance arrangements it must be noted that as Network Operators who will receive these instructions there are number of practical issues to be resolved. These include the format of such instructions, the timescales for their implementation and determination of those embedded generators which will be subject to the emergency instruction. A communication exercise with impacted stakeholders post event may also be required to be managed by Network Operators and we would expect to be supported in this by NGENSO.</p> <p>We look forward to participating in the development of an enduring solution to the issue which has been identified in this modification</p>