

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:	Kirsten Abbott Kirsten.abbott@southernwater.co.uk
Company Name:	Southern Water
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.	This proposal makes sense due to the urgency of the current situation and as a temporary measure only it facilitates Grid Code Objectives
2	Do you support the proposed implementation approach?	<p>We would like to see more detail on how the DNOs will prioritise and disconnect assets.</p> <p>We would like to see the DNOs contact the asset owners proactively prior to disconnection.</p> <p>As a public utility we are concerned with the ability to maintain processes on our sites and would require notice on any disconnection.</p> <p>We would anticipate that there would be a hierarchy in which assets are disconnected. Assets not serving on sites loads being first to be disconnected.</p> <p>Assets serving public utilities and critical infrastructure should be the last to be disconnected.</p>
3	Do you have any other comments in relation to GC0143?	DNOs should proactively engage with companies with generation in areas of particular concern prior to this weekend. Companies such as Southern Water may be able and willing to turn off generation if risks and mitigation are fully understood.