

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 Nisar Ahmed 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:	Charles Deacon, Renewable Connections
Company Name:	On behalf of CUSC parties National Reserve Limited, Mannington Energy Centre Limited, Melksham Energy Centre One Limited and Melksham Energy Centre Two Limited; under the umbrella of Renewable Connections Developments Limited and European Energy A/S.
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

	<p>the Electricity Regulation and any relevant legally 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	Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.	
2	Do you support the proposed implementation approach?	
3	Do you have any other comments in relation to GC0143?	<p>I am writing to raise a few queries/concerns with the proposed modification, namely:</p> <ul style="list-style-type: none"> - How does this interface with the downward flexibility product? It appears some generators will be compensated via this mechanism and others won't. - How is this different to the clauses already imposed upon DG for emergency disconnection via BC2.9.1.4 of the Grid Code using principles OC6.7.1 – this is already clarified as high generation and low distribution demand - How will generation be cut off, is there a stacking order or bids? If so, how is it prioritised? We would like to see prioritisation of low carbon technologies - Some legacy generation doesn't have remote comms, how will they be cut off? - How is imbalance to suppliers addressed? - Is there protection against physical disturbances and local system imbalance that could be caused by this? Do DNOs have a right to refuse a request on these grounds? - How will the market protected to ensure BM plants don't increase their bids, will the market see these signals? - Will existing ANM generation utilise the existing infrastructure in place?