

Code Administrator Consultation Response Proforma**GC0147: Last resort disconnection of Embedded Generation, enduring solution**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to grid.code@nationalgrideso.com by **5pm on 1 March 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Nisar Ahmed Nisar.ahmed@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Richard Wilson
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For reference the Applicable Grid Code Objectives are:

- 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*

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the GC0147 Original Proposal or WAGCM1-	UK Power Networks is supportive of the original proposal such that a licensed system operator must have the ability to take the action required to safeguard the system for unplanned, non-securable events.

	7 better facilitates the Applicable Objectives?	<p>National Grid ESO should be encouraged to have the appropriate commercial arrangements in place to minimise the use of this capability, but we understand they must have the ability to use emergency instructions at short notice if timescales do not permit the use of a commercial service or required services are not available. The appropriate governance should be place, however, to ensure that this remains as a last resort action only.</p> <p>Whilst we do not consider it appropriate that compensation should be payable to embedded generators, if it is ultimately decided that a compensation mechanism should be set up our current belief is that any mechanism should be structured such that any compensation to embedded generators is funded by the generality of customers i.e. is treated as a “pass-through” cost.</p>
2	Do you support the proposed implementation approach?	UK Power Networks supports the proposed implementation approach.
3	Do you have any other comments?	<p>UK Power Networks agrees that a commercial service should be in place to reduce the potential need to enact an emergency instruction to disconnect embedded generation. However as noted in our response to question 1, the integrity of the system must take primacy, and be ensured above all else, and therefore we do not support the commercial service being a requirement of WACM 4/5/6/7 to allow the use of the emergency instruction.</p> <p>We also note that the requirement to disconnect embedded generators at National Grid ESO’s request is outside the control of the DNOs. It is a risk that sits with National Grid ESO. Therefore, if compensation is to be payable to embedded generators such compensation should be paid directly by National Grid ESO. Further, making the DNOs responsible for such compensation would be inconsistent with the National Terms of Connection.</p>