

Workgroup 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 **27 November 2020**. 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
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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 regarding the Workgroup Consultation 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 better facilitates the Applicable Grid Code Objectives?	<p>Yes, it better provides an enduring solution but note below a couple of points which need to be factored in:</p> <ul style="list-style-type: none"> - The compensation and payment method may require a further modification which needs to go live at the same time. - The enduring ODFM solution is currently under review. It is important that the last resort disconnection only takes place after all ODFM and BM volume is exercised. Without an enduring turn-down product such as ODFM we would not support the last resort disconnection solution as it would be used more frequently.
2	Do you support the proposed implementation approach?	We support an implementation date of March 2021 ahead of potential low demand next Spring/Summer. In the unlikely event of low demand prior to this date, then this could be addressed with another urgent mod.
3	Do you have any other comments?	<p>This mod needs to clearly set out specifically what actions need to take place before any last resort disconnection i.e. All BM actions and the use of turn-down products (e.g. the enduring ODFM).</p> <p>This mod needs to dovetail into the enduring ODFM review currently in progress.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Specific GC0147 Workgroup Consultation questions		
5	How can it be ensured that all reasonable commercial alternatives have been pursued first before emergency instructions are used as a last resort?	<p>The inclusion of a list of the types of commercial actions which must take place before the need to trigger the emergency disconnection. This should include BM and ODFM activity.</p> <p>The compensation level should be set to appropriately remunerate assets considering length of shut-down, time and cost of restart and generally to discourage disconnection.</p>

		After an emergency disconnection is triggered, there should be an independent review to assess whether appropriate actions were taken.
6	Are there any further alternatives to emergency disconnection that have not been considered?	No.
7	In terms of possible safety implications of disconnection, are there any specific risks in relation to this solution? What is the additional risk?	We believe that there should be very few safety implications as most sites are designed with trips and disconnections in mind. Assuming last resort disconnections are infrequent then they should not have an impact on warranties and number of restarts etc.
8	How should embedded generators that are not participants in the balancing mechanism be compensated for emergency control actions including disconnection? Is it your opinion that they should be compensated?	Having considered the arguments discussed by the Working Group (WG), we believe that Embedded Generators (EGs) should be compensated if they are disconnected. We believe that is what is intended in the CEP even though they do not have firm connection agreements. We also think they should be compensated even though demand control actions are not. They will lose revenue including the time for the O&M companies to clear all the faults and allow generation to resume.
9	What mechanism could compensation be achieved by?	We support the use of a 'hook' in the Grid Code (as the ESO does not have a contractual relationship with EGs) pointing to a detailed solution set out in the CUSC and/or DCUSA. We understand that another mod would be needed to process this change. The payment method should also consider the method used to reward EGs in the Enduring ODFM Solution.
10	Would modifications to any other GB Codes be required? [for example, imbalance and cash-out arrangements in the BSC, arrangements with DNOs, suppliers or embedded generators	See answer above on possible compensation mod.

	in the CUSC and DCUSA)	
11	Is compensation a requirement of the Clean Energy Package legislation? Please expand where possible on why or why not.	<p>As noted above we believe compensation is supported under the CEP Article 13 para7 which we believe is valid even though EGs do not have firm connection agreements like Transmission connected generators.</p> <p>We note that the WG refer to the CEP which has now been transposed into GB law with no changes to Article 13 para7.</p> <p>We also note that the Access and Forward-Looking Charges Review (AFLCR) is in progress which will cover Distribution Access rights as well as possible Transmission Connection charges at the Distribution level. Compensation may need to be reviewed after the AFLCR is finalised and therefore this solution may not be enduring.</p>
Form/Implementation of instructions		
12	What form should an instruction take? (eg % or MW; registered capacity or active power output)	We support an instruction to disconnect using registered capacity as this is simple and worked well for ODFM.
13	What priority order should generators reasonably be disconnected in? Have a link in the report to the guidance note on priority order.	<p>We support the order used by NGENSO and the DNOs this summer of:</p> <ol style="list-style-type: none"> 1. Non-synchronous generation. 2. Synchronous generations without associated demand. 3. Synchronous generation with associated demand. 4. Critical Distributed Generation support of COVID and Critical National Infrastructure sites
14	What arrangements are necessary for restoration?	A clear process by generation type should be determined and consistently applied across the DNOs. This should consider the length of the shut-down. Compensation may also need to factor in the speed that an EG can safely return to service.
15	How much of the detail of how an instruction should be implemented needs to be codified rather	We support the framework and order of the instruction being put in code to avoid ambiguity.

	than in a guidance document?	
Legal Text		
16	Do you agree with the proposed Grid Code legal text? Please provide the rationale for your response and any specific comments.	Yes, subject to the comments above.