

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
Respondent name:	Patrick Smart
Company name:	Renewable Energy Systems Limited
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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?	Yes, with particular benefit to applicable code objectives b and c.
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
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?	No comment at the present time.
6	Are there any further alternatives to emergency disconnection that have not been considered?	No comment at the present time.
7	In terms of possible safety implications of disconnection, are there any specific risks in relation to this solution? What is the additional risk?	No comment at the present time.
8	How should embedded generators that are not participants in the balancing mechanism	In the interest of establishing a level playing field with transmission connected generators, distribution connected generators should be compensated in the event of emergency disconnection. We note

	be compensated for emergency control actions including disconnection? Is it your opinion that they should be compensated?	commentary around rights of access to distribution systems. This is an area in which Ofgem is proposing to bring more clarity via the Access and Forward Looking charges SCR such that current implied rights are made explicit. To the extent that a generator's right of access, regardless of perceived firmness of that right, is removed as a result of emergency disconnection it is only right that this should attract suitable compensation.
9	What mechanism could compensation be achieved by?	In the interest of efficiency and timely deliver, we would encourage use of existing contractual and regulatory framework.
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 in the CUSC and DCUSA)	No comment at the present time.
11	Is compensation a requirement of the Clean Energy Package legislation? Please expand where possible on why or why not.	No comment.
Form/Implementation of instructions		
12	What form should an instruction take? (eg % or MW; registered capacity or active power output)	In the interest of practicality and simplicity, we suggest MW or %MW of contracted capacity should be used.
13	What priority order should generators reasonably be disconnected in? Have a link in the report to the guidance note on priority order.	No comment at the present time.
14	What arrangements are necessary for restoration?	No comment at the present time.

15	How much of the detail of how an instruction should be implemented needs to be codified rather than in a guidance document?	No comment at the present time.
Legal Text		
16	Do you agree with the proposed Grid Code legal text? Please provide the rationale for your response and any specific comments.	No comment at the present time.