

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:	Andy Vaudin
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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>We believe that modification GC0147 better facilitates objective (iii) “to promote the security and efficiency of the electricity generation, transmission and distribution systems....”</p> <p>This is an essential modification to reduce the risk to consumers of disruption of supply.</p> <p>Neutral for all other objectives.</p>
2	Do you support the proposed implementation approach?	<p>We support the implementation approach of GC0147 to put in place enduring arrangements for emergency instruction as a last resort emergency control action on embedded generators.</p> <p>This includes ‘Embedded Generation Control’ elements setting out, as with Demand Control, how the process will work in conjunction with appropriate system warnings.</p> <p>We support the proposed implementation date for GC0147 of March 2021 – in time for the next low demand periods anticipated in spring 2021</p>
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?	The ESO letters and guidance notes produced following implementation of the GC0143 modification will help to ensure that all reasonable commercial alternatives have been pursued.
6	Are there any further alternatives to emergency disconnection that have not been considered?	No response.
7	In terms of possible safety implications of	Consideration of the Electricity Supply Emergency Code (ESEC) may be necessary to ensure that no

	disconnection, are there any specific risks in relation to this solution? What is the additional risk?	supplies to priority sites are affected by embedded generator disconnections.
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?	We believe that NGENSO should be implementing commercial options to enable it to curtail or disconnect embedded sites, such as a replacement for ODFM, and with the Balancing Mechanism being a main option.
9	What mechanism could compensation be achieved by?	See response to 8 above:
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 response.
11	Is compensation a requirement of the Clean Energy Package legislation? Please expand where possible on why or why not.	Legal clarity on applicability of CEP Article 13(7) should be obtained as the first step if any further work involving DCUSA/CUSC is progressed. We note that this Grid Code workgroup had different views and that there was no conclusion from the workgroup regarding this issue.
Form/Implementation of instructions		
12	What form should an instruction take? (eg % or MW; registered capacity or active power output)	The form of Instructions should be for the Network Operator to achieve a reduction in Active Power output rather than registered capacity.
13	What priority order should generators reasonably be disconnected in? Have	The priority set out in the joint NGENSO/DNO guidance note is a reasonable priority order for generator disconnection.

	a link in the report to the guidance note on priority order.	
14	What arrangements are necessary for restoration?	As proposed in the OC6 code, Network Operator should not commence restoration until instruction is given by the ESO.
15	How much of the detail of how an instruction should be implemented needs to be codified rather than in a guidance document?	We believe that taking the same coding approach to demand control is appropriate and that additional detail can be provided in the guidance documents.
Legal Text		
16	Do you agree with the proposed Grid Code legal text? Please provide the rationale for your response and any specific comments.	We agree in general with the proposed legal text, but note that further review will be required. We do not think it is the best approach to copy sections of separate guidance notes into the actual code text.