

**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](mailto: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](mailto:Nisar.ahmed@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Mike Kay
<b>Company name:</b>	P2 Analysis Ltd
<b>Email address:</b>	mikekay@p2analysis.co.uk
<b>Phone number:</b>	01204 888576

**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~~ licence 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-	The original is sensible and appropriate. The original better facilitates a, c, d and e and is neutral on b. The WAGCMs all interpret the law ambitiously for genuinely negligible commercial gain at the

	7 better facilitates the Applicable Objectives?	expense of considerable commercial and administrative complexity. All the WAGCMs therefore fail all the objectives except b, which is neutral in all these cases.
2	Do you support the proposed implementation approach?	Original, yes; WAGCMs, no.
3	Do you have any other comments?	<p>Yes</p> <p>OC6B.4.9 Each <b>Network Operator</b> will notify <b>The Company</b> in writing that it has complied with <b>The Company's</b> instructions under <b>OC6B.5</b>, within five minutes of so doing, together with an estimation of the <b>Active Power</b> output reduction achieved, in MWs, by the <b>Embedded Generation Control</b>.</p> <p>It is not clear if this means that the DNO shall notify the Company within five minutes of taking the action, or within five minutes of receiving the instruction.</p> <p>OC7 Appendix 1 is displayed on its side. This was understandable when the Grid Code was first created on word processors in 1990. It is not appropriate to keep it rotated through 90° now that Word provide facilities to edit the page in landscape mode. Please change the format of these pages to landscape so that we are not presented with text on its side on screen.</p>