

**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)

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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-	Centrica supports WAGCM7.  A solution must include the provision of compensation for curtailed embedded generation

	7 better facilitates the Applicable Objectives?	<p>and provide assurances that embedded generation will only be curtailed by the system operator after all market-based resources have been used.</p> <p>WAGCM7 aims to cover these points and thereby best facilitates objectives (a), (b) and (c) out of the solutions under consideration. All solutions better facilitate objectives (d) and (e).</p>
2	Do you support the proposed implementation approach?	<p>We support the implementation approach on the condition that ODFM or an equivalent is put in place for this year and that the ESO's Reserve Reform work is on track to deliver an enduring commercial mechanism.</p> <p>The ESO has indicated it will make minimum changes to the ODFM product for summer 2021. We believe the ESO could reasonably accommodate some improvements stakeholders have already requested to the product to increase participation and reduce its cost. A key area for market efficiency is that ODFM actions should be factored into the imbalance price calculation. The ESO should also provide greater clarity on when the ODFM product will be used.</p>
3	Do you have any other comments?	No.