

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 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 or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Andy Vaudin
Company name:	EDF
Email address:	andrew.vaudin@edfenergy.com
Phone number:	07580526370

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 (a) 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-	We believe that GC0147 Original Proposal better facilitates Grid Code objective (iii) "to promote the security and efficiency of the electricity generation, transmission and distribution systems...."

	7 better facilitates the Applicable Objectives?	This is an essential modification to reduce the risk to consumers of disruption of supply. Neutral for all other objectives.
2	Do you support the proposed implementation approach?	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. We support the proposed implementation date for GC0147 of May 2021 – in time for the next low demand periods anticipated in spring 2021
3	Do you have any other comments?	NGESO should be implementing commercial options to enable it to curtail or disconnect embedded sites (such as a replacement for ODFM), so as not to have to use last resort emergency instruction provisions, and with the Balancing Mechanism also being a main option.