

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:	Graeme Vincent
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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-	All of the options address the technical issues and processes associated with establishing an enduring solution to the emergency disconnection of embedded generation and therefore contribute to

	7 better facilitates the Applicable Objectives?	the Grid Code Objectives. We recognise the main differences relate to the application of CEP and compensation arrangements.
2	Do you support the proposed implementation approach?	We are supportive of the proposed approach and appreciate that a solution requires to be implemented prior to the anticipated low demand periods during the bank holiday periods in May.
3	Do you have any other comments?	We appreciate that the solution developed will be only applied as a matter of last resort, when NGENSO have exhausted all other possible commercial means of achieving the necessary downward regulation and therefore we do not believe that compensation for being disconnected is appropriate in these circumstances, recognising that generation could be self dispatching and therefore exacerbating the situation. Whilst we also recognise the wording of CEP legislation, we do not believe that it was intended to apply to emergency instructions of this nature.