

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
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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-	Within the scope of the Grid Code, RenewableUK believes that the proposed alternatives better facilitate the code objectives.

<p>7 better facilitates the Applicable Objectives?</p>	<p>We note the Applicable Grid Code objective of “facilitating effective competition” (B). The powers set out in GC0147 should be last resort. The ESO should set out how they will pursue market mechanisms, including the Optional Downward Flexibility Management (ODFM) Service (which use for 2021 summer period was recently announced) to deliver the necessary reduction in embedded generation, and what risks they consider in this. As part of satisfying the objective to facilitate effective competition, NGESO should be subject to a duty to minimise durations of any generator disconnections and return them to service in the timeliest manner possible.</p> <p>In the interest of establishing a level playing field with transmission connected generators, distribution connected generators should be compensated in the event of emergency disconnection. Sudden disconnection from the network poses a very high risk for generators and should only be considered in extreme situations. The industry is concerned that this change could increase the perceived investment risk in embedded generation, lower investor confidence in generation that is not part of a BM unit and raise costs of generation should the activation of this last resort service be a regular occurrence. In all cases market frameworks should be pursued at first instance.</p> <p>Any decision on disconnection priority should be taken with regard to physical safety and security of supply concerns. However, currently there is no requirement in the CEP to demonstrate disconnecting renewables first based on concerns about low levels of inertia. As such, we believe that the risk of disconnection should be reflective of the lifetime carbon impact of the generators.</p> <p>We note that commercial arrangements such as Schedule 7 are already in place for some embedded generating sites and as such enactment of emergency instruction to the DNO should be pursued only as a last resort option after all market frameworks are exhausted.</p> <p>With regards to the DG access rights to the transmission system, we note that Ofgem is currently looking at options to bring more clarity through the Access and Forward Looking Charges</p>
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		SCR with intent to introduce changes from 2023 onwards.
2	Do you support the proposed implementation approach?	Yes. We note that currently the ESO is consulting on the introduction of ODFM product from 30 April 2021 which would reinforce the commitment to use embedded disconnection as a last resort measure after all commercial routes (including ODFM) have been exhausted.
3	Do you have any other comments?	<p>RenewableUK would support a requirement for a post-event report following the use of last resort embedded generation disconnection. This should be followed by a full incident report coordinated by Ofgem. Pre- and post-event reporting are necessary for transparency since emergency disconnection could have a significant detrimental impact on generators.</p> <p>This could include the actions taken up by the ESO and DNOs (including the use of schedule 7) to this point before activation of the embedded generation disconnections and the amount of generating power removed from the system at that time.</p>