

## Grid Code Administrator Consultation Response Proforma

### GC0143: 'Last resort disconnection of Embedded Generation'

Industry parties are invited to respond to this Code Administrator Consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **17:00** on **5 May 2020** to [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com). Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Modification Report to the Authority.

Any queries on the content of the consultation should be addressed to Christine Brown at [christine.brown1@nationalgrideso.com](mailto:christine.brown1@nationalgrideso.com)

These responses will be included within the Draft Grid Code Modification Report to the Grid Code Panel and within the Final Grid Code Modification Report to the Authority.

<b>Respondent:</b>	<i>Marc Linberry (Operations Director) 07900931622 marc@enviropowerltd.co.uk</i>
<b>Company Name:</b>	<i>Enviropower Ltd Unit 7 Marlborough Business Centre, 24 Marlborough Road, Lancing Business Park, Lancing, West Sussex, BN15 8TP</i>
<b>Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)</b>	<i>See response below, to questions 2 and 3.</i>

### Code Administrator Consultation questions

Q	Question	Response
1	<b>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</b>	<i>No response</i>

2	<p><b>Do you support the proposed implementation approach?</b></p>	<p><i>Enviropower Ltd are against the implementation of GC0143, that the (DNO) will have the authority to disconnect selected embedded generators connected to its system.</i></p> <p><i>Power generation is the primary source of revenue for our business, and it appears that as we are not a participant in the BM, we would not receive curtailment payments should we be switched off, and this would have a significant commercial impact on us.</i></p> <p><i>In switching us off, it would also mean that we are no longer able to burn waste, resulting in our waste disposal / recovery site ceasing to operate, which not only has a commercial impact on us, but also on Adur &amp; Worthing District Council, with whom we have a contract to dispose of their waste. The knock-on effect from this is that waste would have to be diverted placing Public Health at risk, ultimately to landfill, placing significant stress on the system of collection and transfer of material as well as a significant cost.</i></p> <p><i>Our site does not have any form of backup generation, so an unplanned disconnection of the site from the distribution network will cause a site blackout, which depending on many factors, could take hours to be restored. Any site blackout will cause our site to enter a heightened level of instability, with unplanned shutdowns of our boilers, fans and combustion lines etc, resulting in uncontrolled releases of steam dumped to atmosphere, and periods of increased emissions of CO, TOC, and dioxins and furans while waste burns on the grate without sufficient air for complete combustion.</i></p> <p><i>The unstable and unplanned shutdown of the site heightens the risk of potential failure of the plant due to the shock to the system which would very likely require significant maintenance intervention and further unplanned shutdowns for periods of time.</i></p> <p><i>Furthermore, as an EfW site, we give the DNO's an opportunity to regulate system voltage in local networks in a similar fashion to that of the</i></p>
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Q	Question	Response
		<i>transmission connected larger generators, therefore providing greater stability to the grid.</i>
3	<b>Do you have any other comments in relation to GC0143?</b>	<i>If the GC0143 code is passed, Enviropower Ltd would request that we were at the top of the list of embedded generation sites to stay online, given the significant risk to plant, the environment and the commercial impact that this will have on us.</i>