

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. 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

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.

Respondent:	<i>John Henderson</i> (john.henderson@environment-agency.gov.uk)
Company Name:	<i>Environment Agency</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p>The Environment Agency is an executive non-departmental public body, sponsored by the Department for Environment, Food & Rural Affairs. We work to create better places for people and wildlife, and support sustainable development. We are responsible for regulating major industry and waste under the Environmental Permitting Regulations. One of our priorities is to work with businesses and other organisations to manage the use of resources. As part of this The Environment Agency is working hard with the government and other partners to protect the public and environment from the effects of coronavirus (COVID-19) and is the main reason for this consultation response.</p> <p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none">(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

	<p>persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);</p> <p>(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;</p> <p>(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</p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.</p>
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Code Administrator Consultation questions

Q	Question	Response
1	<p>Do you believe GC0143 better facilitates the Grid Code Objectives?</p> <p>Please include your reasoning.</p>	<p>During the response phase to the global pandemic from Coronavirus Covid-19 we would like to highlight the need to consider the potential environmental consequences and operability of key infrastructure important in dealing with this. Much of this infrastructure is supporting waste management activities which are in turn supporting the country to manage the pandemic. These factors should be considered if decisions are made in line with the Grid Code Objectives set out above. The aim should be to ensure operators are given the opportunity to consider the impacts to their operations and permit compliance and the chance to guide and inform the final decision to ensure compliance and where not possible to minimise the environmental impact.</p> <p>Whilst we appreciate this is a balance between demands we would hope that the following key question would help support the decision making which takes place should this be required.</p> <ul style="list-style-type: none"> Any suppliers with an EPR permit should not be asked to disconnect their generation without the operators consent and the ability to remain compliant with their Environmental Permit requirements.

Q	Question	Response
2	Do you support the proposed implementation approach?	Nil response
3	Do you have any other comments in relation to GC0143?	<p>Environmental consequences of switching off such generation are likely to include:</p> <ul style="list-style-type: none"> • Inability to comply with permit limits leading to localised air pollution, noise from uncontrolled steam releases and wasted energy. • Operability impacts on infrastructure crucial to the national response to COVID-19 including disruption to waste management infrastructure such as anaerobic digestion and energy from waste plants. • Lack of control over continuous systems such as landfill gas management leading to potential unmanaged releases of methane. • Potential safety concerns from gas build up via processes that do not respond in the same timescale as decisions made using this code. • Prolonged restart times required for certain key operation should they be required to stop at short notice.