

## 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>Nigel Turvey, DSO &amp; Future Networks Manager.</i> <a href="mailto:nturvey@westernpower.co.uk">nturvey@westernpower.co.uk</a> 07703 628402
<b>Company Name:</b>	<i>Western Power Distribution</i>
<b>Please express your views regarding the Code Administrator Consultation, including rationale.</b> <b>(Please include any issues, suggestions or queries)</b>	<i>For reference, the Applicable Grid Code objectives are:</i>  (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

	<p>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	<b>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</b>	Yes – relevant objective c - it addresses a potential risk to the security of the national electricity transmission system. Our systems have not been implemented for this requirement and the text should be amended to require delivery by DNOs on a 'best endeavours' basis.
2	<b>Do you support the proposed implementation approach?</b>	<p>It should be noted that whilst disconnection of embedded generation can be undertaken, re-connection may require confirmation from the Generator that we will not be closing in out-of sync and in a number of cases will require the Generator to undertake the re-connection. The reconnection instruction from the ESO will need to take account of this – it should be noted that most sites are unmanned and may not have 24/7 response from owner/operator.</p> <p>We believe that the implementation approach would be enhanced by an information exchange between the ESO and DNOs over:</p> <ul style="list-style-type: none"> <li>- the technology type and controllability of individual Generators, including the ability to disconnect remotely and the impact of disconnection on ancillary supplies to the site</li> <li>- which Generators are already under the control of the ESO through commercial mechanisms - E.g. ODFM, FR, other stability related products.</li> </ul> <p>We need this information to exclude these from our disconnection schemes.</p>
3	<b>Do you have any other comments in relation to GC0143?</b>	We also believe that backstop commercial arrangements should be put in place for the ESO to compensate any Generator disconnected or curtailed under these arrangements.