

## 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>Paul Jones</i> <a href="mailto:paul.jones@uniper.energy">paul.jones@uniper.energy</a>
<b>Company Name:</b>	<i>Uniper UK Ltd</i>
<b>Please express your views regarding the Code Administrator Consultation, including rationale. (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>	<p>Yes. Given the present situation, then it would seem prudent to put this in place for a limited period. This appears to be clarifying rights which the ESO presently has under the code. It could be interpreted that the current arrangements require the ESO to specify the plant that the DNO should disconnect, whereas this would allow the ESO to specify a MW figure and rely on the DNO to select the appropriate plant.</p> <p>This proposal would better support security of supply, and therefore applicable objective (c), but would be slightly detrimental to competition if used, and so slightly frustrates objective (b). However, we note that this will only be used as a last resort, once all possible BM actions have been taken, as provided for in the new legal text for BC2.9.4.1.</p>
2	<b>Do you support the proposed implementation approach?</b>	Yes.
3	<b>Do you have any other comments in relation to GC0143?</b>	The proposal seems light on detail on the information to be provided to the market in the event that this mechanism is required to be used. At the very least information needs to be made available to demonstrate that the service was indeed used as an absolute last resort, in order to provide assurance that any distortions to the market have been minimised.