

## 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>Dan Thomas</i> <a href="mailto:dan.thomas@banksgroup.co.uk">dan.thomas@banksgroup.co.uk</a> 07720348078
<b>Company Name:</b>	<i>Banks Renewables</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	<p><b>Do you believe GC0143 better facilitates the Grid Code Objectives? Please include your reasoning.</b></p>	<p>We understand this is an urgent code change driven by the Covid-19 restrictions and their implications on GB demand. We understand that NGENSO believe it is necessary to ensure system stability.</p> <p>It does not though 'facilitate effective competition'. Balancing Market participants would get paid for their response, but embedded generation would not. It should therefore only be used if all commercial options have been exhausted and only available to NGENSO for a limited time period.</p>
2	<p><b>Do you support the proposed implementation approach?</b></p>	
3	<p><b>Do you have any other comments in relation to GC0143?</b></p>	<p>Have the implications on generator's offtake arrangements been considered? Will they be 'kept whole' in the settlement system?</p> <p>If DNOs disconnect embedded generators what requirements will there be to ensure they are promptly reconnected post the 'emergency period'?</p> <p>We have been asking DNO's to consider how this type of service may be offered and provided by embedded generators for some time with little progress. It has to be considered as part of the transition to DSO's.</p>