



GC0143 – Last resort disconnection of Embedded Generation

6 May 2020

Special Grid Code Review Panel - Recommendation Vote

GC0143 Background and urgency request

- GC0143 was raised on 30 April and submitted to the GCRP with a request for it to be treated as ***Urgent***
- The GCRP, on 1 May 2020 ***recommended, by majority***, that the modification be treated as Urgent
- On 1 May 2020, the ***Authority decided*** that GC0143 should be treated as Urgent and follow the timetable recommended by the GCRP

Code Administrator Consultation

- The ***Code Administrator Consultation*** was issued on 1 May 2020 and closed on 5 May 2020 (two working days)
- **67 responses** were received (two confidential)

Code Administrator Consultation summary

Most respondents stated that they understand the reasoning behind the modification being raised and the threat to Security of Supply that the current situation (COVID-19) poses for the GB National Electricity Transmission System (NETS).

Whilst there was broad understanding of the issue facing National Grid ESO there were concerns raised around the approach outlined in this modification. Questions have been raised around the approach through urgency and whether there would be unintended consequences to the modification being implemented as a result.

Code Administrator Consultation responses summary

Theme	Concern
Environmental	Some respondents outlined the environmental impact should they be instructed by their DNO to disconnect without there being time to complete the action in a considered manner.
Implementation & transparency	<ul style="list-style-type: none">• Urgent clarification of how disconnection would be implemented by each DNO;• Notice period envisaged – more transparency on this so there can be a more considered response• The ESO to publish on its website an assessment of the likelihood that the ESO will instruct embedded generators to be disconnected in each network on a day ahead basis
Compensation & level playing field	Concerns were raised around a level playing field for embedded generators that are not part of the BM. It was noted that Transmission Connected Generators would receive compensation, along with consumers but that embedded generators (not part of the BM) do not have arrangements to receive any compensation should the instruction be enacted.

Code Administrator Consultation responses summary

Theme	Concern
Asset impact & restarting	<ul style="list-style-type: none">• Should the disconnection be required without prior notice that this could damage assets and as such incur maintenance and/or repair costs• Some respondents also highlighted that the restart of some plant would include a site visit and that in the current situation they have concerns around travel and restrictions in place across the UK
Time taken to raise the change	It was highlighted that the ESO could have raised this change at an earlier date and that they had the opportunity to do so in the lead up to the paper being raised on the 30 April 2020. The ESO would contend that they raised the proposal as soon as the issue was clearly identified in a rapidly developing situation.
Working with the ESO & new product (Optional Downward Flexibility Management – ODFM)	<p>A couple of respondents stated that they would be open to have discussions with the ESO around what they could do to assist in the current situation.</p> <p>A new product being offered by the ESO was noted and clarity was request on how this proposed change would interact with the new product.</p>
Ongoing Grid Code modifications	<p>GC0133 ‘Timely informing of the GB NETS System State condition’</p> <p>and GC0109 ‘The open, transparent, non-discriminatory and timely publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc., issued by or to the Network Operator(s)’</p>

What can be done to address concerns?

Proposed steps that the ESO will take in conjunction with the submission of the FMR to the Authority for decision:

Action

Work with DNOs on communication that can be published to improve transparency

Letter to be published from the ESO on their position on GC0143

Review all responses ahead of raising a modification for the enduring solution involving all stakeholders in its development

Governance Rules

GR22.4 covers legal text proposed changes & the process

A respondent put forward legal text changes, we recommend that these are not required under (iii)

GR.22.4

A draft of the **Grid Code Modification Report** shall be tabled at the **Panel Meeting** prior to submission of that **Grid Code Modification Report** to the **Authority** as set in accordance with the timetable established pursuant to GR.19.1 at which the Panel may consider any minor changes to the legal drafting and:

- (i) if the change required is a typographical error the **Grid Code Review Panel** may instruct the **Code Administrator** to make the appropriate change and the **Panel Chairman** will undertake the **Grid Code Review Panel Recommendation Vote**; or
- (ii) if the change required is not considered to be a typographical error then the **Grid Code Review Panel** may direct the **Workgroup** to review the change. If the **Workgroup** unanimously agree that the change is minor the **Grid Code Review Panel** may instruct the **Code Administrator** to make the appropriate change and the **Panel Chairman** will undertake the **Grid Code Review Panel Recommendation Vote** otherwise the **Code Administrator** shall issue the **Grid Code Modification Proposal** for further **Code Administrator** consultation after which the **Panel Chairman** will undertake the **Grid Code Review Panel Recommendation Vote**.
- (iii) if a change is not required after consideration, the **Panel Chairman** will undertake the **Grid Code Review Panel Recommendation Vote**.

Urgent Timeline approved by Authority – GC0143

Milestone	Date
Final Modification Report issued to Panel (to check Votes recorded correctly)	6 May 2020
Final Modification Report issued to Ofgem	6 May 2020
Ofgem decision date	7 May 2020
Implementation Date	7 May 2020