

Workgroup Consultation Response Proforma**GC0147: Last resort disconnection of Embedded Generation – enduring solution**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to grid.code@nationalgrideso.com by **5pm** on **27 November 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact **Nisar Ahmed**, Nisar.Ahmed@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Sean Cleary
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For reference the Applicable Grid Code Objectives are:

- 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 binding decisions of the European Commission and/or the Agency; and*
- e) *To promote efficiency in the implementation and administration of the Grid Code arrangements*

Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the GC0147 Original Proposal better facilitates the Applicable Grid Code Objectives?	Yes, the original proposal provides clarity on how the enduring process for the last resort disconnection of embedded generation will be undertaken.
2	Do you support the proposed implementation approach?	We agree with the proposed implementation approach as the enduring solution needs to be codified prior to its potential use during periods of low demand next year.
3	Do you have any other comments?	No.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No.
Specific GC0147 Workgroup Consultation questions		
5	How can it be ensured that all reasonable commercial alternatives have been pursued first before emergency instructions are used as a last resort?	We are confident that the ESO will utilise all available options in the Balancing Mechanism, and expect that the ODFM service (or an ODFM-like product) will be reinstated, providing them with a comprehensive range of commercial options to pursue prior to an emergency instruction.
6	Are there any further alternatives to emergency disconnection that have not been considered?	No (on the basis that ODFM or an ODFM-like product is reinstated).
7	In terms of possible safety implications of disconnection, are there any specific risks in relation to this solution? What is the additional risk?	There are no safety implications from SP Energy Networks perspective as the emergency disconnection is executed remotely and it's highly unlikely any persons will be in the vicinity of plant being operated. As this would be a solicited action and no fault current present SP Energy Networks would not expect any damage or safety issues on their own or customers equipment based on there being no evidence of damage from previous historical disconnections.

8	How should embedded generators that are not participants in the balancing mechanism be compensated for emergency control actions including disconnection? Is it your opinion that they should be compensated?	We are keen to seek Ofgem's view on this particular issue. As a DNO, we have no capacity to provide compensation for this type of disconnection which is being undertaken under instruction from the ESO in order to ensure the integrity of the total system.
9	What mechanism could compensation be achieved by?	As above, we as the DNO's have no method of providing this type of compensation. If compensation is viewed as a requirement, it could feasibly be paid via BSUoS charges, as with the ODFM product.
10	Would modifications to any other GB Codes be required? [for example, imbalance and cash-out arrangements in the BSC, arrangements with DNOs, suppliers or embedded generators in the CUSC and DCUSA)	As per the findings from the workstream, should it be identified that compensation should be made then a CUSC change to allow the ESO to provide DNOs funds for payments would be required; with a DCUSA change, where DNOs could pass the payments to the distributed sites also necessary.
11	Is compensation a requirement of the Clean Energy Package legislation? Please expand where possible on why or why not.	This is not particularly straightforward as acknowledged in the consultation papers. There is an argument that in order to be redispatched, the generator would need to be dispatched by the same entity in the first place and therefore where this isn't the case then compensation shouldn't be paid. This would be more reflective of a centrally dispatched system, however, in general most generators are self-dispatched so the opportunity to prevent too much embedded generation being dispatched in the first place is outwith the control of the ESO and it is difficult to reconcile compensating a generator which is actively contributing to the problem and not reacting to any market signals that are being made. The ESO does not have the opportunity at 'dispatch' stage to prevent an embedded generator from exacerbating the situation.
Form/Implementation of instructions		
12	What form should an instruction take? (eg %	NGESO should instruct DNO's in 50MW blocks with the expectation this is actual active power rather than registered capacity to be disconnected.

	or MW; registered capacity or active power output)	
13	What priority order should generators reasonably be disconnected in? Have a link in the report to the guidance note on priority order.	SP Energy Networks agrees with the Emergency Disconnection order of priority set out in GC0147.
14	What arrangements are necessary for restoration?	SP Energy Networks will follow normal Control Room protocols and contact disconnected generators to discuss and agree switching to re-energise the generator connection.
15	How much of the detail of how an instruction should be implemented needs to be codified rather than in a guidance document?	Similar to GC OC6 emergency demand disconnection an agreed set of words would ensure consistency between SO & DNO's communications. The agreed words should include the relevant Grid Code procedure, DNO to be instructed, volume of real MW's and expected timescale this has to be delivered.
Legal Text		
16	Do you agree with the proposed Grid Code legal text? Please provide the rationale for your response and any specific comments.	Yes – the proposed text gives clarity to the process which would be followed for the last resort disconnection of embedded generation.