

Code Administrator 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 1 March 2021**. 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 |
|-------------------------|---------------------------|
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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 in the right-hand side of the table below, including your rationale.

| Standard Workgroup Consultation questions | | |
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| 1 | Do you believe that the GC0147 Original Proposal or WAGCM1- | Of the proposals WACM 7 provides clear benefits compared to the baseline in terms of the applicable objectives. It also provides a sound basis to develop the |

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| <p>7 better facilitates the Applicable Objectives?</p> | <p>other modifications needed to align and implement across other industry codes.</p> <p>WACM 7 is positive against AGCO (C) as it provides the most comprehensive solution to promote the security and efficiency of the electricity networks whilst not undermining competition AGCO (B). In our view the measures to require development of ODFM or other potential services is a positive measure that incentivises the network to take all available commercial actions. We also believe that the proposal is positive in relation to AGCO (D) as it applies the principles of Art 13 of the recast electricity directive, the Clean Energy Package, as the basis for compensation. As noted in the workgroup, the recast directive has been transposed into national legislation. In our opinion WACM 7 is the option most likely to lead to the defect being resolved and the formal powers to curtail not being required.</p> <p>Drax recognises that all the proposals may need supplemental code modifications raising to ensure the 'What', 'How' and 'Who' of the re-dispatching action is appropriately cascaded through all relevant codes. We believe that WACM 7 provides the right principles and basis from which this work can be taken forward.</p> <p>By contrast, the original proposal does not adequately address the criticisms highlighted in GC0143 and the workgroup with respect to undermining competition and potentially distorting any market for services that may be used by the ESO prior to the issuing of the emergency instruction to a DN. In our opinion it fails to satisfy AGCO (B) and by inference AGCCO (C) as any improvement in security could be undermined by the lack of compensation and/or market arrangements. Against AGCO (D) the original is negative as it does not appear to be compliant with aspects of the Clean Energy Package, particularly Art 13.7 which only enables non-market based redispatch where there is appropriate financial compensation.</p> <p>Conclusion</p> <p>Implementation of WACM 7 would maximise the benefit against the applicable grid code objectives.</p> |
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| 2 | Do you support the proposed implementation approach? | Yes – noting that modifications may need progressing in other codes to implement a comprehensive solution. |
| 3 | Do you have any other comments? | No other comments. |