

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		
1	Do you believe that the GC0147 Original Proposal or WAGCM1-	Within the scope of the Grid Code, Ecotricity believes that the proposed alternative WAGCM 7 better facilitate the code objectives – and indeed

	7 better facilitates the Applicable Objectives?	<p>this was the majority view of the Working Group members eligible to vote.</p> <p>We note the Applicable Grid Code objective of “facilitating effective competition” (B). The powers set out in GC0147 should be last resort. The ESO should set out how they will pursue market mechanisms, including the Optional Downward Flexibility Management (ODFM) Service (which prospective use for 2021 summer period was recently announced) to deliver the necessary reduction in embedded generation, and what risks they consider in this.</p> <p>In the interest of establishing a level playing field with transmission connected generators, distribution connected generators should be compensated in the event of emergency disconnection. Sudden disconnection from the network poses a very high risk for generators, whereas well planned ODFM deployment mitigates this risk. In all cases market frameworks should be pursued at first instance.</p> <p>With regards to the DG access rights to the transmission system, we note that Ofgem is currently looking at options to bring more clarity through the Access and Forward Looking Charges SCR with intent to introduce changes from 2023 onwards.</p>
2	Do you support the proposed implementation approach?	<p>Yes. We note that currently the ESO is consulting on the introduction of ODFM product on 30 April 2021 which would reinforce the commitment to use embedded disconnection as a last resort measure after all commercial routes – including ODFM - have been exhausted.</p>
3	Do you have any other comments?	<p>a) It should be noted that all the DNOs did not vote for WAGCM 7, and it was unclear why that was, or what their objection was</p> <p>b) Ecotricity believe that should a last resort disconnection take place, a post-event report should be produced and made public. This should be followed by a full incident report coordinated by Ofgem. Pre and post event reporting are necessary for transparency</p>

		since emergency disconnection could have a significant detrimental impact on generators. This could include the actions taken up to this point before activation of the embedded generation disconnections and the number and generating power removed from the system at that time