

Grenlec Comments

On

Draft Sector Grid Code – Introduction Code

March 13th, 2020

Reservations of Rights – Grenada Electricity Services Limited (Grenlec) submits these comments and responses without prejudice to (i) its several request for reasonable extensions of time to fully review, analyse and comment on the Draft Sector Grid Code – Introduction Code 2019; (ii) its right to be engaged in pre-consultation with the PURC in relation to the Draft Sector Grid Code – Introduction Code 2019; and (iii) its right to submit further comments on the Draft Sector Grid Code – Introduction Code 2019. Grenlec does not waive, acquiesce in the waiving or he relinquishing of any of its legal or equitable rights by submitting these responses and reserves all its rights.

APPENDIX A

Grid Code Definitions

Page 17 “**Customer** - Any person or public body **or private entity** supplied, ~~or requesting to be supplied,~~ with electricity by a Network Licensee”

GRENLEC A customer a person or entity with whom a network licensee has a supply contract. There may be legitimate reasons why a person or entity requesting to be supplied may be denied service.

Page 20 “**Fuel Supply Plan** - The Generator's plan for providing fuel to ensure its operation in accordance with the terms and provisions of this Code or any contracted Power Purchase Agreement. The Fuel Supply Plan shall include, but not be limited to, the Generator's proposed fuel specification, fuel supply and transportation arrangements, and the Generator's ~~plans to obtain~~ **obtaining** fuel on the most economic basis at **the time any given time** **that the fuel contract is awarded.**”

GRENLEC When a fuel contract is signed it is for a specified duration. If before the contract expires the Generator receives an unsolicited offer for fuel at a lower price the contract still binds the generator to the original supplier.

Page 21 “**Grenada Electricity Services Limited** - Grenada Electricity Services Limited (also referred to as GRENLEC) ~~is the current Network Licensee~~ was the integrated utility supplying Grenada at the time of the introduction of these regulations.”

GRENLEC Grenada Electricity Services Limited was not only a Network Licensee but also had Generation Licensee.

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“N-2 - The Contingency principle which allow for the loss of any two largest individual elements from the Generation System which maintains the integrity of supply while still being able to maintain an unrestricted supply.”

GRENEC The elements lost must be the two largest.

Submitted Without Prejudice to the Reservations of Rights He