Workgroup Consultation Response Proforma

**GC0156: Facilitating the Implementation of the Electricity System Restoration Standard**

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 **30 December 2022**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Banke John-Okwesa banke.john-okwesa@nationalgrideso.com or grid.code@nationalgrideso.com

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| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |

**I wish my response to be:**

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| (Please mark the relevant box) | [ ] Non-Confidential | [ ] Confidential |

*Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

**For reference the Applicable Grid Code Objectives are:**

1. *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
2. *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);*
3. *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;*
4. *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*
5. *To promote efficiency in the implementation and administration of the Grid Code arrangements*

**Please express your views using the tick boxes and text box spaces provided in the right-hand side of the table below.**

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| **Standard Workgroup Consultation questions** |
| 1 | Do you believe that the Original Proposal better facilitates the Applicable Objectives? | Mark the Objectives which you believe each solution better facilitates: |
| Original | [ ] A [ ] B [ ] C [ ] D [ ] E |
| Click or tap here to enter text. |
| 2 | Do you support the proposed implementation approach? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 3 | Do you have any other comments? | Click or tap here to enter text. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?  | [ ] Yes[ ] No |
| Click or tap here to enter text. |

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| **Specific Workgroup Consultation questions** |
| 5 | Do you believe that a cost benefit analysis should be undertaken by the Workgroup and if yes what factors should be considered? | [ ] Yes[ ] No  |
| 6 | Do you believe that parties obligated by GC0156 should have a cost recovery mechanism in place?  | [ ] Yes[ ] No  |
| 7 | Do you think that the proposals are sufficient and cost effective to ensure that NGESO can meet its ESRS licence obligations? Please provide a rationale for your answer  | [ ] Yes[ ] No  |
| 8 | Do you agree that all the costs associated with TO/DNO implementation of ESRS should be recovered through their respective price controls? If not, what funding mechanism do you favour? | [ ] Yes[ ] No  |
| 9 | The ESRS restoration target is expressed in terms of transmission demand rather than total demand (see Glossary and Definitions). Do you understand the implications of this, and are you happy with those implications?  | [ ] Yes[ ] No  |
| 10 | Do you think that there is a common understanding between stakeholders of the demand to be restored in GB required by ESRS? | [ ] Yes[ ] No  |
| 11 | Do you see any barriers for Network Operators and Users to deliver the changes proposed to implement the ESRS by December 2026? | [ ] Yes[ ] No  |
| 12 | Do you believe there are further changes to the network i.e. NETS and/or Distribution Network required to implement ESRS obligations? | [ ] Yes[ ] No  |
| 13 | The Annex (pages 29 – 32) in the Future Networks subgroup report covers 2 scenarios where site supplies are lost up to 72 hours. Which of these 2 scenarios is the most realistic? (The full details of these scenarios can be found on pages 29 – 34 of the Future Networks subgroup report in Annex 4) | [ ] Scenario 1[ ] Scenario 2 |
| 14 | What are your views on the scope of the parties being impacted by the mandatory changes proposed as part of GC0156? | [ ] Yes[ ] No  |
| 15 | The GC0156 proposed solution 72 hrs resilience is expected to be applied retrospectively to existing CUSC parties.  Do you agree with this retrospective application and if not, what is your rationale / view about this? | [ ] Yes[ ] No  |
| 16 | Do you believe that cyber security requirements in accordance with the NIS standard are sufficient and as referenced in the proposed Grid Code drafting (available in Annex 6)? | [ ] Yes[ ] No  |
| 17 | Do you agree that the draft legal text is appropriate and sufficient to implement GC0156? If not please provide your suggestions? | [ ] Yes[ ] No  |
| 18 | Are there any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting? |   |
| 19 | Do you believe there should be further assurance activities in addition to those described in the proposed legal text within OC5? If yes, please state the activity and explain why? |  |
| 20 | Do you think the right requirements have been identified for Network Operators in terms of Network design and operational capability as summarised in the consultation document and annex and as detailed in the proposed legal text in CC/ECC.6.4.6.3b and OC9?  | [ ] Yes[ ] No  |
| 21 | Due to comments received from some Workgroup members on Appendix 9 (technical requirements associated with restoration services) of the ECC draft legal text, the ESO has proposed that a separate subgroup should be established under the umbrella of GC0156 to develop a set of technical requirements associated with restoration services for inclusion in the Relevant Electrical Standards which would include appropriate experts from across the industry. Do you believe this is an appropriate way forward if not why? | [ ] Yes[ ] No  |
| 22 | Are you aware that Anchor Plants may be expected to carry out a deadline line charge test and remote synchronisation test as described in OC5.7.2.2(h) / OC5.7.2.3(d)? If so, do you have a view on this test? | [ ] Yes[ ] No  |
| 23 | The distributed restart legal text has been drafted on the basis that ESO will lead on the procurement of restoration services. Do you think this should move to DNO led in future? If yes, please explain why | [ ] Yes[ ] No  |
| 24 | The distributed restart legal text has been drafted on the basis that: i) there will be a connection agreement with the DNO that binds an embedded restoration service provider to the Distribution Code and ii) a tripartite agreement that binds the embedded restoration service provider to the relevant parts of the Grid and Distribution Codes. Do you see any difficulties with this proposed contractual arrangement? | [ ] Yes[ ] No  |
| 25 | Do you believe it is appropriate to have a mains independence minimum resilience period of 24 hours as required by the NCER or 72 hours as a general GB standard for existing black start purposes as proposed with the GC0156 solution for Grid Code parties, BM parties, VLPs and restoration service providers? Do you agree with a retrospective application of this and if not, what is your suggestion / views about this? | [ ] Yes[ ] No  |
| 26 | As a stakeholder, are there any implications of the proposed future requirements which are not clear? | [ ] Yes[ ] No  |
| 27 | Do you have any views on how the requirements should be implemented into the Grid Code bearing in mind the requirements of the ESRS are not enforceable until 31 December 2026?  | [ ] Yes[ ] No  |
| 28  | Do you agree with Ofgem's proposed approach to the DNO ESR re-opener? | [ ] Yes[ ] No  |