

**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](mailto:grid.code@nationalgrideso.com) by **5pm** on **21 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](mailto:banke.john-okwesa@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

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**I wish my response to be:**

(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:**

- 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 using the tick boxes and text box spaces provided in the right-hand side of the table below.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <p>Original    <input checked="" type="checkbox"/> A    <input checked="" type="checkbox"/> B    <input checked="" type="checkbox"/> C    <input type="checkbox"/> D    <input type="checkbox"/> E</p> <p>Click or tap here to enter text.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
3	Do you have any other comments?	<p>The proposals represent a step change in the way in which electricity restoration will be delivered and utilises tools and techniques which have not yet been deployed at an operational level or at scale. It is inevitable that some tweaking/changes will be required to the legal text as learning is gained through the deployment and development of Distributed Restoration Zone Plans (DZRP).</p> <p>We currently do not believe that the proposed Distributed Restoration Zone Control System Standard is sufficiently well developed to allow a Network Operator to be able to determine what is required and it is heavily biased towards the communications requirements rather than the requirements of the DRZC system itself.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

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?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The requirements arising from the new ESRS is a mandatory requirement and we believe that the costs associated with adopting (and implementing) the new standard will have previously been considered during its development. The solutions developed through this modification have not (as yet) had any alternative solutions suggested and therefore it would be difficult to establish an appropriate counterfactual position.</p>

		We acknowledge that costs will be incurred during the implementation, however, we expect the ESO to structure any procurement and Tender Assessment process in order to secure an appropriate level of capability to meet the ESRS requirements (both regionally and nationally) in the most cost efficient manner taking into consideration not only the costs of the Restoration Service Providers but also of the Network Operators and Transmission Owners (if appropriate).
6	Do you believe that parties obligated by GC0156 should have a cost recovery mechanism in place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Those parties which are already connected and have mandatory obligations placed upon them through GC01506 should be provided a means to recover their costs, however, for new connections these obligations should be considered as a part of the requirements of connection and the costs considered as part of the overall connection costs.</p>
7	<p>Do you think that the proposals are sufficient and cost effective to ensure that NGESO can meet its ESRS licence obligations?</p> <p>Please provide a rationale for your answer</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>It is still unclear how these proposals will actually be brought together in such a way as to ensure that the requirements of the ESRS are met and that this will be achieved in a sufficient and cost effective manner. The lack of a clear and credible plan of how the demand in the various regions is to be met (80% within 24hours) and how these regions (or power islands) are then grown and then synchronised together to ensure that 100% of <i>transmission level</i> demand is restored gives rise to our concerns.</p>
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>The cost recovery mechanism employed is via reopeners and allows for efficient expenditure to be recovered, it is therefore important to ensure that any of the obligations being placed on the TOs or DNOs are sufficiently well defined to avoid inefficient solutions being developed and the risk that these may not be funded. It is also important that the price controls recognise not only the capital expenditure elements but also the ongoing operational expenditure which arise from the obligations being placed upon these parties.</p>
9	The ESRS restoration target is expressed in terms of	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	transmission demand rather than total demand (see Glossary and Definitions). Do you understand the implications of this, and are you happy with those implications?	Whilst we as industry parties recognise the subtleties of this definition, we believe that those who are less involved may not fully understand the significant differences and the implications which arise. For example it is important to understand that transmission demand does not cover all demand associated with customers and therefore not all customers may be restored within the 5 day period which may be envisaged from the text of the ESRS.
10	Do you think that there is a common understanding between stakeholders of the demand to be restored in GB required by ESRS?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No As mentioned above
11	Do you see any barriers for Network Operators and Users to deliver the changes proposed to implement the ESRS by December 2026?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No There is still a great deal of uncertainty around many of the new proposals which have not been deployed before and therefore there is the possibility of significant learning to be achieved across both Network Operators and Users during the transition from trials to business as usual. Some areas where we see potential issues are <ul style="list-style-type: none"> <li>• Uncertainty around establishment of DZRPs and the number required to meet the ESRS requirements.</li> <li>• Lack of detail from NGESO on the overall plan to achieve ESRS</li> <li>• Distribution Restoration Zone Control Systems (DRZCS) – the specification has only just been published as part of this consultation and does not fully address all aspects of the control system.</li> <li>• Other Code modifications to ensure that ESRS can be achieved are still outstanding eg STC</li> </ul>
12	Do you believe there are further changes to the network i.e. NETS and/or Distribution Network required to implement ESRS obligations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No As previously mentioned, these proposals introduce new concepts such as the DRZP and new technologies such as the DRZCS. As these have not yet been proven within an operational environment there is still the high possibility that changes will be required. It should also be noted that the formation of a DZRP will be site and plant specific, so the exact details of what is required, including communications requirements between all

		parties within the DRZP, will only become clear once the associated restoration plan is developed in detail.
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)	<input type="checkbox"/> Scenario 1 <input type="checkbox"/> Scenario 2 <p>Both scenarios are equally realistic – though Scenario 1 is probably one which is most likely given that it describes the current arrangements when the Transmission System is operating normally. However, the focus of GC056 is in facilitating the implementation of the ESRS which in effect is the situation as described in scenario 2.</p>
14	What are your views on the scope of the parties being impacted by the mandatory changes proposed as part of GC0156?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>We think that this answer is best left to those parties affected to provide a response.</p>
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>In order to ensure the best opportunity to meeting the requirements of the ESRS then we believe that this is a necessary step.</p>
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)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Yes, we believe that these should align with the latest NIS guidance as laid out in UK law and promoted by Ofgem.</p>
17	Do you agree that the draft legal text is appropriate and sufficient to implement GC0156? If not please provide your suggestions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>We appreciate that significant work has been devoted to the development and review of the legal text within the working group but note that some of the proposed documents were not provided to the working group prior to them being published as part of the workgroup consultation. Where we have concerns with the</p>

		proposed legal text these have been provided separately.
18	Are there any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting?	We believe that this would best be answered by those prospective new entrants.
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?	No, the prescribed level of assurance activities and the regular industry exercises are sufficient to give an appropriate level of assurance. Increasing the range of assurance activities runs the risk of creating additional workload for little additional benefit. Increasing the level and frequency of testing also runs the risk that network access will become limited so either tests will not be able to be undertaken or work (whether it is connection-, replacement-, reinforcement- or maintenance- related) on the distribution system or transmission system will be delayed.
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>We do not believe that there is sufficient clarity to allow network operators to fully understand the implications to their network in terms of design or operational capability. We note that the references to CC/ECC.6.4.6.3b are not valid and it should refer to CC.6.4.5.2 and ECC.6.4.6.2, however, our comments above still apply.</p>
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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We note that Appendix 9 has been removed from the draft legal text but believe it would be more appropriate for the required technical standards to be documented in one location rather than detailed within individual contracts as this should aid transparency and consistency in application. It would also ensure that a common set of terms, definitions and parameters are applied across GB.</p>

	industry. Do you believe this is an appropriate way forward if not why?	
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Yes we are aware of the requirement written into the draft legal text for this but as noted during the workgroup we are not convinced that potential anchor plants may fully understand what is fully involved in undertaking a deadline charge test nor what the implications are for network operators to undertake these on a routine basis (the number of tests required will vary depending on the number of anchor plants within a particular region) without putting customers at risk of interruption.</p>
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>The ESO currently retains the licence obligation and the funding for ESRS related activities so it is only right that it retains the responsibility for procuring and funding the appropriate level of services so that it can satisfy its obligation and do this in the most cost efficient manner taking into account the availability of resources across GB. It may be appropriate in time that some of the procurement activities move to the DNO but it will still be important that a GB system wide approach is maintained to ensure that sufficient resources are procured on a geographic basis so that the ESRS can be met.</p>
24	<p>The distributed restart legal text has been drafted on the basis that:</p> <p>i) there will be a connection agreement with the DNO that binds an embedded restoration service provider to the Distribution Code and</p> <p>ii) a tripartite agreement that binds the embedded restoration service provider to the relevant parts of the Grid and Distribution Codes.</p> <p>Do you see any difficulties with this proposed contractual arrangement?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>We do not see any difficulties with this approach as it seems pragmatic and aligns with the findings of the Distributed ReStart project.</p>

25	<p>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?</p> <p>Do you agree with a retrospective application of this and if not, what is your suggestion / views about this?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Yes/No is not an appropriate response to this question. In order for GB to maximise the opportunity to achieve the timescales established in the ESRS we believe that 72 hours would be a more appropriate requirement. How this is applied to customers who have no physical assets and become Restoration Service Providers is worthy of further consideration.</p>
26	<p>As a stakeholder, are there any implications of the proposed future requirements which are not clear?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>It is still not clear how these individual solutions will be brought together to achieve the requirements of the ESRS and the some of the concepts are new and untried and it is therefore difficult to not say 'yes' to this. We have previously highlighted our concerns in relation to the DRZC system standard which we believe does not fully cover the requirements needed to provide the DNO with a functional specification which can be used to develop a DRZC system.</p>
27	<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>There is a clear expectation from BEIS that changes required should be implemented as quickly as possible and therefore to allow Users as much time as possible to implement any required changes or to develop a DZRP, the modifications should be made as soon as possible. This is especially important where the retrospective application is being proposed.</p>
28	<p>Do you agree with Ofgem's proposed approach to the DNO ESR re-opener?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We are not sure that this is an area entirely appropriate for a Grid Code consultation, as this is subject to its own governance arrangements through the RIIO-ED2 framework.</p>