

**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 **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](mailto:banke.john-okwesa@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details
Respondent name:	Steven Pollok
Company name:	Kinlochleven Power limited
Email address:	steven.pollok@alvancegroup.com
Phone number:	07484 939345

**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:**

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- 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);*
- 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;*
- 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*
- 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 type="checkbox"/> A    <input type="checkbox"/> B    <input type="checkbox"/> C    <input type="checkbox"/> D    <input type="checkbox"/> E</p> <p>The Original Proposal is unlikely to be a cost-effective solution (a) and would impose an unnecessary universal compliance overhead (e).</p>
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Not entirely. Please see comments below.</p>
3	Do you have any other comments?	<p>What (if any) exemption or derogation process will be in place? Has consideration been given to system restoration capabilities that would realistically be available from generators that have no ability to supply ESRS. Attempts were made to use Kinlochleven Hydro to black start the local DNO system, but all attempts proved futile.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We would like the mandatory retrospective application of these requirements to be removed.</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Value for money of mandating ESRS capability for existing plant and for new plant.</p>
6	Do you believe that parties obligated by GC0156 should have a cost recovery mechanism in place?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</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 type="checkbox"/> No  No comment
8	<p>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?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No  No comment
9	<p>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?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Implications are not clear.
10	<p>Do you think that there is a common understanding between stakeholders of the demand to be restored in GB required by ESRS?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11	<p>Do you see any barriers for Network Operators and Users to deliver the changes proposed to implement the ESRS by December 2026?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Requiring modifications to existing User plant and confirmation of compliance is likely to be costly, time consuming and in many cases of no practical use to the network operators. Not all existing User plant may be suitable or cost effective for delivering ESRS services even if modifications were to be made.

12	Do you believe there are further changes to the network i.e. NETS and/or Distribution Network required to implement ESRS obligations?	<input type="checkbox"/> Yes <input type="checkbox"/> No No comment
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 checked="" type="checkbox"/> Scenario 2
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>It is not appropriate or cost-effective for all existing Users to be required to comply when not all Users are intended to be contracted to offer System Restoration Services. Any requirement to be able to operate in island mode is exceptionally onerous for grid-connected hydro plant in general, and for Kinlochleven Hydro in particular. These requirements should not be applied to existing plant which was not designed to, is not able to, and does not intend to, offer System Restoration Services.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>These requirements should not be applied to existing plant which was not designed to, is not able to, and does not intend to, offer System Restoration Services. If any of the requirements are mandatory then the necessary plant modifications should be fully funded.</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 type="checkbox"/> Yes <input type="checkbox"/> No No comment
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 type="checkbox"/> No No comment
18	Are there any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting?	No comment
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 comment
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 type="checkbox"/> No No comment

**Commented [CA1]:** Note: this should refer to CC.6.4.5.2 and ECC.6.4.6.2. to match the re-drafted current version of the CC and ECC legal text

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?	<input type="checkbox"/> Yes <input type="checkbox"/> No  Technical requirements should be carefully considered and laid out in detail, and clear compliance guidance should be provided to CUSC parties.
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 type="checkbox"/> Yes <input type="checkbox"/> No  Not applicable
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 type="checkbox"/> No  No comment

**Commented [CA2]:** Note: Appendix 9 text was initially drafted as part of ECC draft legal text within GC0156, however it was later suggested that it should be moved into the RES.

Therefore Appendix 9 is not in the published draft legal text.

The purpose of this question is to establish whether you agree with this approach?

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>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>No comment</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</p> <p><input type="checkbox"/> No</p> <p>24 hours</p> <p>We do not agree with a retrospective application of an increased resilience duration.</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</p> <p><input type="checkbox"/> No</p> <p>Exactly how hydro plant would be able to achieve and demonstrate compliance is not clear.</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 type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	

28	Do you agree with Ofgem's proposed approach to the DNO ESR re-opener?	<input type="checkbox"/> Yes <input type="checkbox"/> No No comment
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