

Workgroup Consultation Response Proforma**GC0148: Implementation of EU Emergency and Restoration Code Phase II**

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 27 April 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 Sally Musaka sally.musaka@nationalgrideso.com or grid.code@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Graeme Vincent
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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:

- 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 in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" 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>Yes for those areas not related to the introduction of the legal text for Distributed ReStart. We believe that whilst GC0148 introduces the necessary enabling concepts for electricity restoration from distributed resources, there is significant interaction with GC0156 on how these facilities will be used to meet the requirements set out in the Electricity System Restoration Standard (ESRS). It is likely that areas modified by GC0148 will be subject to further modification by GC0156 and therefore to avoid multiple changes to the same area of the Grid Code in a short period of time it would be better to align GC0148 Distributed ReStart legal changes with the solutions being developed as part of GC0156.</p>
3	Do you have any other comments?	We have included some additional comments embedded within the legal text documents attached to this response.
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- GC0148		
5	Do you think it is appropriate to include the Distributed Restart amendments within this modification bearing in mind such proposals would fall under the EU	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>Emergency and Restoration Code, or do you think that the Distributed Restart legal text should be transferred to GC0156, so that it can be finalised in the context of the ERSR requirements? Please provide a rationale for your response.</p>	<p>Whilst we acknowledge that incorporating the requirements from Distributed ReStart was an appropriate step at the start of the GC0148 modification process and that including such provisions would ensure that transparency was provided to Users at an early stage we also recognise the current position in that the Distributed ReStart project has not completed. We also understand that a number of the live trials in the Power Engineering and Trials workstream remain to be undertaken/completed so learning from these has yet to be finalised and incorporated into industry feedback. During the progress of GC0148, another working group GC0156 has been established which is likely to have interactions with the Distributed ReStart legal text. Whilst both of these areas are ongoing it may be premature to introduce new obligations and requirements which are not yet fully proven, or which relies on technology which has not been developed, trialled and tested as this may give a false sense of readiness to stakeholders.</p> <p>Whilst the GC0148 modification would introduce the relevant concepts and processes to facilitate electricity restoration from distributed resources these have been predicated on the establishment of one DRZP per area, however, to meet the requirements of the ESRS it is likely that many more will be required and the interactions between these has not been truly investigated. We would therefore urge caution in the approach that assumes that GC0148 modifications mean that Distributed ReStart can be adopted straightaway and the overall strategy for its deployment should be considered fully within the realms of GC0156.</p>
6a	<p>The DR legal text has been drafted on the basis that i) there will be a Connection Agreement with the DNO that binds an embedded RSP to the DCode and ii) a Tripartite Agreement that binds the embedded RSP to the relevant parts of the GCode and DCode. Do you see any difficulties with this proposed contractual arrangement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>There do not appear to be any difficulties with this approach as it is important that the embedded RSP is compliant with its obligations to the network which it is connected to and also to the ESO who it is contractually obligated to provide the restoration services to. As the organisational structure of the industry develops alternative more efficient arrangements may present themselves.</p>

6b	<p>The DR legal text has been drafted on the basis that NGESO will lead on the procurement of RSs. This is one of the three implementation methods developed in the Distributed Restart project as described in section / annex 11 of this consultation. Do you agree that this is the most appropriate way to implement Distributed Restart, or should one of the alternative approaches be developed? Please provide a rationale for your response</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We agree that at this particular moment in time the appropriate strategy has been taken given the current legal obligations on the ESO and the embryonic status of the Distribution System Operator (DSO) role. However, as the role of the DSO becomes more established and the role of the FSO evolves it may be more appropriate for an alternative procurement process to be established.</p>
7	<p>Do you believe Distribution Network Operators, Significant Grid Users, Defence Service Providers and Restoration Service Providers have adequate resilience of their critical tools and facilities as detailed in EU NCER Article 42(1)(2) and (5) as drafted in the legal text in Annex 8 Please provide your rationale. Do you believe that the NCER requirements have been correctly interpreted in the proposed legal text?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Yes, we believe that DNOs (and Transmission licensees) have adequate resilience built into their critical tools and facilities. It is for other Users to comment on the resilience of their equipment though it may be worth noting that the resilience of any communications network may be worth reviewing especially in light of experiences during recent storms.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>As far as our understanding of the relevant clauses we believe that this has been correctly reflected in the legal text in Annex 8.</p>

8	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 is generally standard in GB for existing black start purposes and is being proposed as part of the ESRS work?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>Our preference would be for the resilience to be set at 72 hours (as a minimum) as this will align with general industry guidance arising from the 2008 Exercise Phoenix findings as well as the current requirements established in EREC G91. Though given the introduction of the ESRS which anticipates that full demand will be restored within 5 days it may be that a longer period should be considered, and this should form part of the deliberations of GC0156 work group once the strategy for achieving the ESRS requirements is established and documented.</p>
9	Do you believe the approach proposed of introducing non-CUSC parties under the framework of the NCER (i.e. non-CUSC parties who have a contract with the ESO as defence service providers and/or restoration service providers) is an appropriate solution going forward? If not please explain why you believe this is the case.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Based on the current status of the industry then yes the current proposed solution would seem to be appropriate though as the industry changes and roles such as that of the DSO develop then an alternative method for including non-CUSC parties in the arrangements may become more appropriate and viable.</p> <p>It should be noted that currently the obligations and funding mechanisms reside for Electricity Restoration reside with the ESO and as such payment for the provision of restoration services is currently funded via the ESO.</p>
10	Do you have any comments on the draft distributed restart contracts in Annex 15?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>We have no particular comments on the draft Anchor Plant Capability contract other than to suggest that for transparency this should be made available on the appropriate ESO webpage.</p>
11	Do you have any comments on the notification letters in Annex 7?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>As per question 10 we have no particular comments.</p>

