

Workgroup Consultation Response Proforma**CM089: 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 stcteam@nationalgrideso.com by **5pm on 18 May 2023**. 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 Milly Lewis Milly.Lewis@nationalgrideso.com or stcteam@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Michelle MacDonald Sandison
Company name:	Scottish Hydro Electric Transmission plc (SHET)
Email address:	Michelle.MacDonaldSandison@sse.com
Phone number:	01738 342183

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 STC Objectives are:

- a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission
- c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees
- e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.
- f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;
- g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

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 <input type="checkbox"/>F <input checked="" type="checkbox"/>G</p> <p>SHET believes the Original Proposal better facilitates objectives A, B C, D and G.</p> <p>Specifically, this modification supports the wider changes being made to Electricity System Restoration and supports the work done under GC0156. The introduction of this change into the STC will provide structure and timescales to support parties of the STC in restoring the NETS within the timescales provided in the BEIS Policy Paper (Objective B and D).</p> <p>We don't agree with the ESOs assessments of Objectives E and F, specifically for F, SHET believes it is a stretch to state that implementing Electricity System Restoration has any impact on facilitating access onto the NETS for generation not yet connected to the system.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>SHET is supportive of the implementation approach as it aligns with GC0156. SHET's only query regarding the implementation approach is the line which includes 'Annual Restoration Strategy', as we are not clear on what this term means, and it is not defined or used in any of the supporting documentation or legal texts. We believe this will need to be clarified for the Code Administrator Consultation.</p>
3	Do you have any other comments?	<p>Yes, SHET is overall supportive of the changes being proposed under CM089 in order to support the wider Restoration Standards implementation. SHET has noted in the Proposer Solution section that the Cyber Security regulations have been specifically called out (albeit with the year omitted). SHET therefore wonders why all applicable regulations have not been mentioned, or whether specific amendments have been made to the Cyber Security regulation mentioned, the current text does not make this clear.</p>

4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No SHET does not wish to raise an Alternative.
Specific Workgroup Consultation questions		
5	Do you believe there are any further changes required to the STC based on the proposed changes to the Grid Code as part of GC0156?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No SHET believes changes are still required to the STCP's (for example STCP6-1) and would appreciate the modification being raised for this so those changes can be considered. SHET feel that further work is required to specify responsibilities to design and build the network to be able to facilitate restoration. We should have clarity on the expectations before the events. Hence, we feel that there should be additional sections into the Planning Timescales of the SQSS to define clarity on what level of design the network should have for Restoration.