

**Code Administrator 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 09 June 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](mailto:Milly.Lewis@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body	<input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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

Standard Code Administrator Consultation questions														
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> <tr> <td>WAGCM1</td> <td><input checked="" type="checkbox"/>A</td> <td><input checked="" type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table> <p>Northern Powergrid believes that both the Original proposal and alternative (WAGCM1) facilitate NGESO meeting their obligations under the ESRS.</p>	Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	WAGCM1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E									
WAGCM1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E									
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/>Original  <input checked="" type="checkbox"/>WAGCM1  <input type="checkbox"/>No preference</p> <p>Northern Powergrid believes the WAGCM is more likely to be implemented within the target timescale. Under the WAGCM, the System Operator will need to undertake an assessment of whether the current resilience arrangements of the existing generation fleet (whether contracted to provide restoration services or not) are sufficient or whether there is a need to target expenditure, or contract for further restoration services, to resolve any issues which arise.</p>												
3	Do you support the proposed implementation approach?	<p>Yes</p> <p>Northern Powergrid supports the proposed implementation approach and will work with NGESO to meet the proposed timescale for those elements we are responsible for.</p>												
3	Do you have any other comments?	<p>We have reviewed the legal text included in the CAC and have some comments on the following documents.</p> <ul style="list-style-type: none"> <li>Annex 10 – Control Telephony Standard</li> <li>Annex 11 – Communication Standard</li> <li>Annex 16- Post Send Back proposed changes to GC0148 Legal Text</li> <li>Annex 17 – Alternative Proposal (WAGCM1)</li> <li>Annex 20 – CC</li> <li>Annex 20 – DRC</li> <li>Annex 20 – General Conditions</li> </ul>												

- Annex 20 – Glossary and Definitions
- Annex 20 – OC5
- Annex 20 – OC9
- Annex 20 – PC

Most of these are of a minor editorial nature, however there are some comments that may be considered to be more material including:

- DRC Schedule 16 part IV includes some timescales for assurance activities which are not consistent with other timescales in other parts of the Code.

We were also unclear about the status of the text in Annex 16. Is the proposal that the GC156 legal text in Annex 20 will be further modified by the text in Annex 16 if the GC0148 legal text, as amended by the response to the send-back letter, is approved? It is important that its clear to stakeholders what legal text will be sent to The Authority as part of the Final Modification Report.

We have also reviewed Annex 6 – Distribution Restoration Zone Control Standard and note that many of the issues we have raised during the limited development of the document have not been addressed and hence we remain of the view that the document is not suitable for setting out requirements. However, we also note that the document now indicates that it should be seen as providing ‘guidance’ rather than setting ‘requirements’ and believe that the document is (only) suitable to provide guidance, and we are comfortable with the document on this basis. If this is not the intent of the current version of the document then we think it required further development and we are happy to work with the ESO to do this.

As a general observation, some of the .pdf versions of the legal text documents included as part of the CAC were particularly difficult to read as the change tracking included changes to text added during workgroup discussions rather than, more normally, just the change from the baseline version of the Grid Code. We understand that this modification has been particularly complex, is interactive with GC148 and that there have been more iterations of the proposals than usual, however there would be merit in the ESO carefully reviewing the ‘clean’ version of the legal text to ensure that there are no

		typographical / editorial issues in the final version of the legal text.
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