

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 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 or grid.code@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Andy Vaudin	
Company name:	EDF ENERGY	
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Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body	<input type="checkbox"/> Interconnector <input checked="" type="checkbox"/> Storage <input checked="" 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:

- 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;*

- 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?	Mark the Objectives which you believe the proposed solution(s) better facilitates:										
		<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 checked="" 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 checked="" type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table>	Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	WAGCM1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C
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<p>The Original proposal does <u>not</u> better facilitate Applicable Objective B.</p> <p>The Original Proposal has not demonstrated the extent of the current shortfall in capability to achieve ESRS. Therefore, there could potentially be unnecessary and significant costs, which follow from a mandatory compliance requirement on all Generators. Noting that, only a subset of Generators, which are awarded commercial contracts as Restoration Contractors, would have these costs covered.</p> <p>WAGCM1 would lead to additional commercial contracts for those Generators assessed as being required to meet ESRS, rather than retrospective mandatory compliance on all generators.</p>												
2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input checked="" type="checkbox"/> WAGCM1 <input type="checkbox"/> No preference										
		<p>WAGCM1 is preferred because this would require an assessment of the capability of generators to contribute to meeting the ESRS requirements. WAGCM1 then would lead to commercial contracts for those additional Generators, assessed as being required to meet ESRS, rather than retrospective mandatory compliance on all Generators.</p> <p>The Original Proposal has not demonstrated the extent of the current shortfall in capability to achieve ESRS. Therefore, there could be potentially unnecessary and significant costs, which follow from a mandatory compliance requirement on all Generators. Noting that, a subset of Generators, which are awarded commercial</p>										

		contracts as Restoration Contractors, would have these costs covered.
3	Do you support the proposed implementation approach?	<p>It is very important to ensure that an adequate framework is in place to support partial/total restoration. The proposed implementation approach is supported, However, the following issues are noted:</p> <ul style="list-style-type: none"> • Retrospective obligations (where material) should have cost recovery. The CUSC CMP398 Proposal could address this issue. It is not reasonable for parties to pay material costs. • The Original Proposal has not demonstrated the extent of the current shortfall in capability to achieve ESRS. • The Proposal has not provided an analysis of the feasibility of achieving compliance with mandatory obligations by 2026 (and providing assurance of this compliance). This could be a risk to meeting the ESRS.
3	Do you have any other comments?	<p>The CAC document section “Analysis of effects of GC0156 on Parties” clause a.3 implies that island mode operation capability would be a mandatory requirement for all Generators. This is not consistent with workgroup discussions and the proposed new Grid Code legal text included in CC 6.3.7 and ECC 6.3.7.8.3.2. This new Grid Code text would allow a Generator to advise of limited/ or zero capability to operate in this mode (via the new proposed DRC schedule 16). Our response is based on this reading of the new legal text rather than the CAC document.</p>