

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:	Sean Gauton	
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Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" 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 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> <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> <p>In the context of the new license condition obligation placed on the ESO the original proposal and WAGCM1 better facilitate applicable grid code objectives a,b,c & d.</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	WAGCM1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E
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WAGCM1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input checked="" 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>Imposing mandatory obligations retrospectively almost always imposes additional costs. At the outset BEIS made clear that no parties should be financially disadvantaged by the introduction of the new restoration standard. The original proposal introduced additional obligations on parties but did not provide a cost recovery mechanism for all. WAGCM1 is an appropriate and efficient solution to address this issue.</p>												
3	Do you support the proposed implementation approach?	<p>Yes.</p> <p>The use of Local Joint Restoration Plans and Distributed Restoration Zone Plans will identify a specific requirement for each plant.</p>												
3	Do you have any other comments?	<p>The consultation notes that CUSC proposal CMP398 has been raised to put in place a cost recovery mechanism for CUSC parties who face additional costs to meet new obligations retrospectively applied but do not receive a restoration contract. The solution proposed in CMP398 is complex when compared to the solution provided if GC0156 WACM1 is adopted. Parties identified as having a role in Local Joint Restoration Plans and Distributed Restoration Zone Plans will receive restoration contracts and will recover their costs. Parties not required in LJRP and DRZP will not face additional costs, and consumers will benefit by not paying for unnecessary plant</p>												

		modifications. Therefore, addressing the issue in this modification rather than in CMP398 appears to deliver a better outcome over all.
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