

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:	Greg Stevenson	
Company name:	Scottish Hydro Electric Transmission plc (SHET)	
Email address:	Greg.Stevenson@sse.com	
Phone number:	07467397988	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input 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 checked="" 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?	Mark the Objectives which you believe the proposed solution(s) better facilitates:
		Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D <input type="checkbox"/> E
		WAGCM1 <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		<p>Original</p> <p>A - Yes it ensures that all parties are aware of their requirements and obligations should a total or partial shutdown of the NETS occur.</p> <p>B - Yes as having restoration service providers allows for network restoration in the timescales set out by the BEIS policy paper which allows for effective competition in the generation and supply of electricity.</p> <p>C – We do not believe it would fully promote security and efficiency. The consultation states that “not every generator will be contracted to offer the service” – this does not align with the need to ensure generation can start. We agree that not all services should be contracted, however the fundamental ability to be resilient and then start following a shutdown will be needed within the ESRS. Therefore, this is a significant gap to achieving the ESRS target if generation will not be able to start as the power islands grow.</p> <p>D - Yes it would discharge the new Licence obligations as it would implement them into the codes which means all current and future affected parties will need to adhere to these obligations. SHET, however, does not believe that a code change alone can be the only tool use to ensure compliance with the ESRS.</p> <p>E - Neutral not negative, we don't think the baseline is better but neutral on response.</p> <p>WAGCM</p> <p>A - We do not believe the Alternative would lead to an efficient, coordinated, and economical system. With all</p>

		<p>generation needing to be able to start, a market is unlikely to operate efficiently in this scenario.</p> <p>B – We do not believe that the Alternative facilitate effective competition as it does not ensure Generators will retrospectively carrying out the necessary upgrades required.</p> <p>C - We do not believe that the Alternative promotes security and efficiency as well as the Original due to the ESO having to procure all ESRS services commercially using Anchor & Top-up services contracts. This is not as straightforward and efficient as the original due to added complexity.</p> <p>D - We do not believe that the Alternative efficiently discharges the obligations the way the Original does. The Alternative quotes Page 1: 2017 2196 Article 4, paragraph 1(d) but this would not be applicable here, as the requirement to start within a restoration is a fundamental capability that is needed for resilience. Further the clause is applied for network security and stability, rather than resilience.</p> <p>E - Neutral</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/>Original</p> <p><input type="checkbox"/>WAGCM1</p> <p><input type="checkbox"/>No preference</p> <p>We believe that the Original better facilitates the implementation of the ESRS.</p>
3	Do you support the proposed implementation approach?	<p>Yes, we support the proposed implementation approach.</p> <p>We support that the Grid Code and STCs should be utilised, rather than developing sub codes.</p> <p>We note that TO obligations will be addressed through an STC modification. STC change CM089 must provide clarity of responsibilities and demand definition must be aligned across CM089.</p>
3	Do you have any other comments?	<p>As the industry decentralises and decarbonises Offshore generators and aggregators will need to be able to have 72 hours mains independence for the ESRS to ensure fairness and delivery of the ESRS.</p> <p>The consultation states that all respondents to the Workgroup consultation, aside from the ESO, either felt that the GC0156 proposals are not sufficient or had no comments. This demonstrates that there is still a need to have more clarity and action from the ESO on the ESRS.</p>

	<p>As touched on above as it is essential that the capability is created within the whole generation fleet, including retrospective.</p> <p>The Original proposal does take a step forward, however there is much more to achieve prior to meeting requirements of the ESRS. The proposal does create a complicated solution which could be simplified to be more effective.</p>
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