

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:	Graeme Vincent	
Company name:	SP Energy Networks	
Email address:	graeme.vincent@spenergynetworks.co.uk	
Phone number:	07753 622336	
Which best describes your organisation?	<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 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?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input 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 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> </table> <p>Click or tap here to enter text.</p>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	WAGCM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E
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WAGCM1	<input type="checkbox"/> A	<input 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 type="checkbox"/>WAGCM1 <input checked="" type="checkbox"/>No preference</p> <p>Click or tap here to enter text.</p>												
3	Do you support the proposed implementation approach?	<p>Yes we are supportive of the proposed implementation approach.</p> <p>Click or tap here to enter text.</p>												
3	Do you have any other comments?	<p>Whilst we recognise the significant issues around the retrospective application of resilience requirements to existing plant which was never designed to have this capability, we also recognise the legitimate concerns around the fact that without sufficient generation having appropriate resilience then the ability to meet the timescales specified within the ESRS will prove to be extremely challenging, if not impossible to meet.</p> <p>The restoration of the system within the prescribed timescales is dependent upon sufficient generation being available to establish and grow a stable power island. Having significant portions of generation unavailable will make this task even more difficult – with the solution either being to ensure that sufficient generation is placed under contract to provide this as a restoration service or alternatively have a mandatory resilience requirement placed upon all parties.</p> <p>However, in order to determine the most appropriate solution it is important to have a clear and well-articulated restoration plan so that all parties understand how the</p>												

		ESO intends to achieve the require timescales and the role that they play in the restoration process. It may be that extending resilience requirements to those over a certain threshold is the most appropriate solution going forward rather than a full retrospective application which may incur significant costs for older plant to achieve.
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