

**Workgroup 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 **21 December 2022**. 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 Banke John-Okwesa [banke.john-okwesa@nationalgrideso.com](mailto:banke.john-okwesa@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Alan Creighton
<b>Company name:</b>	Northern Powergrid
<b>Email address:</b>	alan.creighton@northernpowergrid.com
<b>Phone number:</b>	07850015515

**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 using the tick boxes and text box spaces provided in the right-hand side of the table below.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <p>Original    <input checked="" type="checkbox"/> A    <input type="checkbox"/> B    <input checked="" type="checkbox"/> C    <input type="checkbox"/> D    <input type="checkbox"/> E</p> <p>Click or tap here to enter text.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We are comfortable with the general implementation approach but believe it is important to clarify when each of the new obligations on parties would take effect, specifically whether they come into effect before 31 December 2026.</p>
3	Do you have any other comments?	<p>We have reviewed the legal text in Annex 6 and some of the other Annex documents, and we have comments on the following documents. Our comments are embedded within these documents which forms an integral part of our consultation response:</p> <ol style="list-style-type: none"> <li>1. Glossary &amp; Definitions</li> <li>2. Planning Code</li> <li>3. Operating Code 1</li> <li>4. Operating Code 2</li> <li>5. Operating Code 5</li> <li>6. Operating Code 9</li> <li>7. Data Registration Code</li> <li>8. Connection Conditions</li> <li>9. European Connection Conditions</li> <li>10. System Defence Plan</li> <li>11. System Restoration Plan</li> <li>12. System Test Plan</li> <li>13. Distribution Restoration Zone Control System Standard</li> <li>14. Control Telephony Standard</li> <li>15. Communications Standard</li> <li>16. Balancing Code 2</li> <li>17. Balancing Code 4</li> </ol> <p>In relation to the concept of Distribution Restoration Zones, we recognise their importance for system restoration in the future, but their development is not mature and, as industry develops experience in their development and operation, it is very likely that further Grid Code changes will be required.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

	for the Workgroup to consider?	
--	--------------------------------	--

### Specific Workgroup Consultation questions

5	Do you believe that a cost benefit analysis should be undertaken by the Workgroup and if yes what factors should be considered?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We understand that a CBA was carried out by government to establish the ESRS obligations, but it is unclear to us whether the GC0156 proposals are the minimum required to achieve ESRS or whether the proposed new obligations are more than those required to achieve the ESRS requirements. Given that the cost of remedial work that would be required, by generators in particular, will be ultimately borne by consumers, we believe that any new obligations and the associated expenditure over and above that reasonably required to achieve the ESRS should be subject to a CBA.</p>
6	Do you believe that parties obligated by GC0156 should have a cost recovery mechanism in place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7	<p>Do you think that the proposals are sufficient and cost effective to ensure that NGESO can meet its ESRS licence obligations?</p> <p>Please provide a rationale for your answer</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>We do not believe that NGESO has provided sufficient information for us to be able to answer this question. The fact that NGESO has raised this modification implies that their view is that the present arrangements are insufficient to meet the ESRS, however the gap between the ESRS requirements and the restoration that could reasonably be expected to be delivered via the existing capability is unclear. Hence, it is difficult to assess whether the proposals in this modification are sufficient or excessive. The workgroup has not discussed the costs that may be incurred by generators, nor the wider societal benefits, so it is unclear whether the proposals are cost effective.</p>
8	Do you agree that all the costs associated with TO/DNO implementation of ESRS should be recovered through their respective price controls? If not, what funding mechanism do you favour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

9	The ESRS restoration target is expressed in terms of transmission demand rather than total demand (see Glossary and Definitions). Do you understand the implications of this, and are you happy with those implications?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>We understand the nuances associated with the use of the term Transmission Demand, but we are not convinced that this is the correct term or concept that should be applied as there is a risk that it will raise customer expectations about supply restoration that are greater than those required or that will be delivered by the ESRS.</p> <p>We understand the thinking that the ESRS provides a target demand that should be restored within specified timescales, but we believe from a customer perspective, basing the requirement on the gross demand that should be restored at each Grid Supply Point substation and therefore the proportion of customers that should be restored at each Grid Supply Point substation would be better understood by stakeholders.</p>
10	Do you think that there is a common understanding between stakeholders of the demand to be restored in GB required by ESRS?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please see our response to question 9.</p>
11	Do you see any barriers for Network Operators and Users to deliver the changes proposed to implement the ESRS by December 2026?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>We are comfortable with the new obligations that would apply to a Network Operator with respect to supporting NGESO's implementation of LJRP's. However, it is important to remember that the development and implementation of Distribution Restoration Zone Plans is a new concept and there will inevitably be issues that will emerge which need to be addressed in the future.</p> <p>We have no comments on whether there are barriers for other Users.</p>
12	Do you believe there are further changes to the network i.e. NETS and/or Distribution Network required to implement ESRS obligations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>Given that the gap between capability of the present arrangements to deliver system restoration and those proposed in GC0156 is unclear, it is difficult to answer this question.</p>

		We agree with the expectation that the role of LJRP in system restoration will reduce over time and that the role of DRZPs will increase. As we mention in our response to question 11, development of DRZPs is in its infancy and it is very likely that further changes will be required in this area as experience develops.
13	The Annex (pages 29 – 32) in the Future Networks subgroup report covers 2 scenarios where site supplies are lost up to 72 hours. Which of these 2 scenarios is the most realistic? (The full details of these scenarios can be found on pages 29 – 34 of the Future Networks subgroup report in Annex 4)	<input type="checkbox"/> Scenario 1 <input type="checkbox"/> Scenario 2  As a general comment, we have concerns about the governance of the GC0156 subgroups and we are not convinced that the reports represent the views of workgroup members particularly as the reports continued to be developed after the subgroups had been disbanded. We have previously shared these concerns with NGESO.  In relation to the question posed, both scenarios are realistic, Scenario 1 relates to a situation where there is not a total or partial shutdown; Scenario 2 relates to a situation where there is a total or partial shutdown.
14	What are your views on the scope of the parties being impacted by the mandatory changes proposed as part of GC0156?	<input type="checkbox"/> Yes <input type="checkbox"/> No  Please see our response to question 11 in relation to the changes impacting Network Operators.  We have no specific comments on the implications for other parties, although we suspect that the proposed retrospective changes on CUSC parties who don't have a restoration contract and those CUSC parties who don't have physical assets (e.g. aggregators) are not widely understood by those stakeholders.
15	The GC0156 proposed solution 72 hrs resilience is expected to be applied retrospectively to existing CUSC parties. Do you agree with this retrospective application and if not, what is your rationale / view about this?	<input type="checkbox"/> Yes <input type="checkbox"/> No  We are comfortable with the proposed 72 hours resilience from a Network Operators perspective.  As mentioned previously, it is not clear to us that the proposed resilience requirement needs to be applied retrospectively to all the existing CUSC parties, as opposed to a targeted group of CUSC parties. We are of the view that the proposed resilience requirement should only be imposed on those CUSC parties where the

		proposed resilience is reasonably required to ensure NGESO can meet its ESRS obligations.
16	Do you believe that cyber security requirements in accordance with the NIS standard are sufficient and as referenced in the proposed Grid Code drafting (available in Annex 6)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
17	Do you agree that the draft legal text is appropriate and sufficient to implement GC0156? If not please provide your suggestions?	<input type="checkbox"/> Yes <input type="checkbox"/> No In general, yes, but see our response to question 3.
18	Are there any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting?	We have no response to this question.
19	Do you believe there should be further assurance activities in addition to those described in the proposed legal text within OC5? If yes, please state the activity and explain why?	We think that the assurance activities as currently drafted are sufficient.
20	Do you think the right requirements have been identified for Network Operators in terms of Network design and operational capability as summarised in the consultation document and annex and as detailed in the proposed legal text in CC/ECC.6.4.6.3b and OC9?	<input type="checkbox"/> Yes <input type="checkbox"/> No There doesn't seem to be a clause CC/ECC6.4.6.3b in the versions included in the consultation pack, however we have provided detailed comments on the Distribution Restoration Zone text in CC.6.4.5 and OC9. See our response to question 3. As mentioned in our response to question 2 it is important to clarify when each of the new requirements would take effect, specifically whether they come into effect before 31 December 2026.
21	Due to comments received from some Workgroup members on Appendix 9 (technical requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No It is important that there is clarity and consistency of the technical requirements for plant owned/operated by



	associated with restoration services) of the ECC draft legal text, the ESO has proposed that a separate subgroup should be established under the umbrella of GC0156 to develop a set of technical requirements associated with restoration services for inclusion in the Relevant Electrical Standards which would include appropriate experts from across the industry. Do you believe this is an appropriate way forward if not why?	Restoration Service Providers. In the longer term we believe that these requirements should be included in the Grid Code, but given the work required to develop them into a suitable form, we agree that developing them as an Electrical Standard is reasonable as an interim solution. Unless this work can all be completed within the timescale of finalising GC0156, which seems unlikely, developing the standard via a subgroup of GC0156 may not work from a governance perspective. There are alternative governance arrangements associated with electrical standards which may be more appropriate.
22	Are you aware that Anchor Plants may be expected to carry out a deadline line charge test and remote synchronisation test as described in OC5.7.2.2(h) / OC5.7.2.3(d)? If so, do you have a view on this test?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We recognise that such tests are an important aspect to ESRS assurance, however we do have concerns for the implications of other customers supplied from the key circuits in the Distributed Restoration Zone, as the tests may involve other customers being de-energised depending on the network topology. There could be adverse implications for DNOs in terms of IIS incentives and curtailment payments under Ofgem's Access SCR proposals.</p>
23	The distributed restart legal text has been drafted on the basis that ESO will lead on the procurement of restoration services. Do you think this should move to DNO led in future? If yes, please explain why	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We agree that it is appropriate that the ESO lead on the procurement of restoration services at the moment but believe that these arrangements should be reviewed in the future (5 years) once the role of DSOs become clearer.</p>
24	The distributed restart legal text has been drafted on the basis that: i) there will be a connection agreement with the DNO that binds an embedded restoration service provider to the Distribution Code and	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We agree that it is an appropriate arrangement at the moment, provided that there is alignment between the Grid Code and Distribution Code legal text, but believe that these arrangements should be reviewed in the future (5 years) once the role of DSOs become clearer.</p>

	<p>ii) a tripartite agreement that binds the embedded restoration service provider to the relevant parts of the Grid and Distribution Codes.</p> <p>Do you see any difficulties with this proposed contractual arrangement?</p>	
25	<p>Do you believe it is appropriate to have a mains independence minimum resilience period of 24 hours as required by the NCER or 72 hours as a general GB standard for existing black start purposes as proposed with the GC0156 solution for Grid Code parties, BM parties, VLPs and restoration service providers?</p> <p>Do you agree with a retrospective application of this and if not, what is your suggestion / views about this?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We agree with the proposal to require 72 hour resilience rather than 24 hours as required by the NCER.</p> <p>We believe the proposals are reasonable for Network Operators, but we are not convinced that they are appropriate for all CUSC parties - see our response to question 15.</p> <p>We understand the concern associated with VLP and parties providing aggregated restoration services, and believe that further consideration is required to establish the reasonable requirements for such parties based on a better understanding of the risks (particularly common mode risks) that may prevent these parties from delivering restoration services. As the services provided by such parties become more material, the resilience of their systems will become more important.</p>
26	<p>As a stakeholder, are there any implications of the proposed future requirements which are not clear?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We understand the implications for DNOs proposed in GC0156, although, as mentioned earlier, it is important to recognise the uncertainties associated with Distribution Restoration Zones.</p>
27	<p>Do you have any views on how the requirements should be implemented into the Grid Code bearing in mind the requirements of the ESRS are not enforceable until 31 December 2026?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The new requirements need to be included in the Grid Code as soon as practicable to give certainty to affected stakeholders, however, as stated earlier in our response to question 2, there needs to be clarity of the date when each of the new requirements will come into force. We do recognise that some requirements e.g. those relating to Distribution Restoration Zones will only become</p>



		relevant as they are developed. Others, such as the requirement to provide 72 hours resilience, will need to have a clearly defined implementation date, presumably 31 December 2026.
28	Do you agree with Ofgem's proposed approach to the DNO ESR re-opener?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No