

**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>	Andy Vaudin
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**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> <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 type="checkbox"/> D</td> <td><input type="checkbox"/> E</td> </tr> </table> <p><i>The proposal should better facilitate objectives A and C, subject to the issues below being addressed.</i></p>	Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E			
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><i>It is very important to ensure that an adequate framework is in place to support partial/total restoration. The proposed implementation approach is supported, subject to the following issues being addressed:</i></p> <ul style="list-style-type: none"> <li><i>Retrospective obligations (where material ) should have cost recovery. It is noted that a current CUSC Proposal could address this issue. It is not reasonable for parties to pay material costs.</i></li> <li><i>The proposer has not made clear (e.g. through presentation of analysis), the quantity of plant that would be expected to receive commercial Top up Restoration Service Provider contracts, and also the quantity of non-funded plant that would be required for restoration.</i></li> <li><i>The mandatory obligation to have personnel availability to restart needs to be based on reasonable endeavours ( e.g. if trees are down and roads are closed a generator may not be able to restart).</i></li> <li><i>The CC 6.3.5.2 obligation to adjust governor settings is unclear and open ended. Generators would be unable to confirm compliance as it stands.</i></li> <li><i>The proposer 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 further risk to meeting the restoration obligation.</i></li> <li><i>Plant where it is known to be prohibitively expensive, or definitively not feasible, to comply with the mandatory requirements should have hard coded exemptions in the legal text. It is not efficient to expect these generators to follow a derogation process.</i></li> <li><i>The proposal should be clear that safety grounds are allowable reasons to reject restoration re-synchronisation instructions. BC 2.9.2.1 allows the rejection of emergency instructions on safety grounds, but this should also be explicitly stated in the OC9 legal text. In particular it should be recorded that nuclear plant would require a large GB</i></li> </ul>						

		<i>wide synchronised power island to be in place, prior to restarting.</i>
3	Do you have any other comments?	<i>None</i>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <i>Not at this stage, but subject to consideration of the comments included in this response.</i>

### 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  <ul style="list-style-type: none"> <li><i>The workgroup should undertake an analysis of the proposal to confirm that it is following a cost-effective route. Included in this would be that the proposer has not made clear (e.g. through presentation of analysis), the quantity of plant that would be expected to receive commercial Top up Restoration Service Provider contracts, and also the quantity of non-funded plant that would be required for restoration.</i></li> </ul>
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  <i>Retrospective obligations (where material ) should have cost recovery. It is noted that a current CUSC Proposal could address this issue. It is not reasonable for parties to pay material costs.</i>
7	Do you think that the proposals are sufficient and cost effective to ensure that NGESO can meet its ESRS licence obligations?  Please provide a rationale for your answer	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <i>It is assumed that the Proposer has carried out analysis, which confirms that the proposals are sufficient and cost effective to ensure that NGESO can meet its ESRS licence obligations. This analysis should be provided to the workgroup in order to address this question.</i>
8	Do you agree that all the costs associated with TO/DNO implementation of ESRS should be recovered through their respective price	<input type="checkbox"/> Yes <input type="checkbox"/> No  <i>No response</i>

	controls? If not, what funding mechanism do you favour?	
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 checked="" type="checkbox"/> No <i>BEIS confirmed to the workgroup that the restoration target is based on advice and analysis provided by NGENSO. This advice and analysis have not been provided to the workgroup. This would be required for the workgroup to take a view on the implications of the restoration target.</i>
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 <i>BEIS confirmed that the restoration target is based on advice and analysis provided by NGENSO. This advice and analysis have not been provided to the workgroup. This would be required for the workgroup to take a view on the implications of the restoration target.</i>
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 <i>No response</i>
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 <i>No response</i>
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 <i>No response</i>
14	What are your views on the scope of the parties being impacted by the mandatory	<input type="checkbox"/> Yes <input type="checkbox"/> No

	changes proposed as part of GC0156?	<ul style="list-style-type: none"> <li><i>The proposer has not made clear, e.g. through presentation of analysis, the quantity of plant that would be expected to receive commercial Top up Restoration Service Provider contracts, and also the quantity of non-funded plant that would be required for restoration. This would be important to decide the scope of plant included in the mandatory changes.</i></li> <li><i>Retrospective obligations (where material ) should have cost recovery. It is noted that a current CUSC Proposal could address this issue. It is not reasonable for parties to pay material costs.</i></li> <li><i>Plant where it is known to be prohibitively expensive or definitively not feasible to comply with the mandatory requirements should have hard coded exemptions in the legal text. It is not efficient to expect these generators to follow a derogation process</i></li> <li><i>The mandatory obligation to have personnel availability to restart needs to be based on reasonable endeavours ( e.g. if trees are down and roads are closed, a generator may not be able to restart).</i></li> <li><i>The CC 6.3.5.2 obligation to adjust governor settings is unclear and open ended. Generators would be unable to confirm compliance as it stands</i></li> <li><i>The proposer has not provided an analysis of the feasibility of achieving compliance with retrospective mandatory obligations by 2026 (and providing assurance of this compliance). This could be a further risk to meeting the restoration obligation.</i></li> </ul>
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 <ul style="list-style-type: none"> <li><i>Retrospective obligations (where material ) should have cost recovery. It is noted that a current CUSC Proposal could address this issue. It is not reasonable for parties to pay material costs.</i></li> <li><i>Plant where it is known to be prohibitively expensive or definitively not feasible to comply with the mandatory requirements should have hard coded exemptions in the legal text. It is not efficient to expect these generators to follow a derogation process</i></li> </ul>

		<ul style="list-style-type: none"> <li><i>The mandatory obligation to have personnel availability to restart needs to be based on reasonable endeavours ( e.g. if trees are down and roads are closed, a generator may not be able to restart).</i></li> <li><i>The CC 6.3.5.2 obligation to adjust governor settings is unclear and open ended. Generators would be unable to confirm compliance as it stands.</i></li> <li><i>The proposer 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 further risk to meeting the restoration obligation.</i></li> </ul>
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 type="checkbox"/> Yes <input type="checkbox"/> No  No response
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 checked="" type="checkbox"/> No  <ul style="list-style-type: none"> <li><i>Plant where it is known to be prohibitively expensive or definitively not feasible to comply with the mandatory requirements should have hard coded exemptions in the legal text. It is not efficient to expect these generators to follow a derogation process.</i></li> <li><i>The proposal should be clear that safety grounds are allowable grounds to reject restoration re-synchronisation instructions. BC 2.9.2.1 allows the rejection of emergency instructions on safety grounds, but this should also be explicitly stated in the OC9 legal text. In particular it should be recorded that nuclear plant would require a large GB wide synchronised power isnaad to be in place, prior to restarting</i></li> </ul>
18	Are there any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting?	<i>None identified at present</i>
19	Do you believe there should be further assurance activities	<i>The proposer has not provided an analysis of the feasibility of achieving compliance with mandatory</i>



	in addition to those described in the proposed legal text within OC5? If yes, please state the activity and explain why?	<i>obligations by 2026 (and providing assurance of this compliance). This could be a further risk to meeting the restoration obligation.</i>
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  <i>No response</i>
21	Due to comments received from some Workgroup members on Appendix 9 (technical requirements 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <i>No response</i>
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  <i>No response</i>

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 type="checkbox"/> Yes <input type="checkbox"/> No  <i>No response</i>
24	<p>The distributed restart legal text has been drafted on the basis that:</p> <p>i) there will be a connection agreement with the DNO that binds an embedded restoration service provider to the Distribution Code and</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>	<input type="checkbox"/> Yes <input type="checkbox"/> No  <i>No response</i>
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>	<input type="checkbox"/> Yes <input type="checkbox"/> No  <i>No response</i>
26	As a stakeholder, are there any implications of the proposed future requirements which are not clear?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <i>No response</i>



27	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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <i>The implementation date in the Grid Code could be 31/12/26, with the ESO undertaking a programme to facilitate any required plant modifications and ensure compliance. Cf - the ALoMCP, where prior to the implementation date, a change and compliance assurance process was progressed.</i>
28	Do you agree with Ofgem's proposed approach to the DNO ESR re-opener?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <i>No response</i>