

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 by **5pm on 30 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 or grid.code@nationalgrideso.com

Respondent details	Please enter your details
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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> <p>Original <input checked="" type="checkbox"/> A <input checked="" 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>Click or tap here to enter text.</p>
3	Do you have any other comments?	<p>This modification proposes some radical changes to the design and operation of distribution systems with embedded generation. There is as yet no operating experience for these proposals. It is highly likely that unforeseen issues will arise, and there should be the expectation that further detailed work and code modification will be required.</p> <p>The new definition of “GB Restoration Service Provider” should not be in the Grid Code since it is not used. It is used in the defence and restoration plans – but it is (a) not needed and (b) not appropriate.</p> <p>If it has to be defined then it should be defined only in the documents it is used in as:</p> <p>“A party who is a CUSC signatory or a party who is not a CUSC signatory but who has a contract with The Company to provide a Restoration Service”</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

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?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>ESRS is a mandatory requirement, and so far the proposals of this modification do not have options, and have been developed by stakeholders. There are</p>

		implementation costs, but in the absence of alternative approaches, there is little to be gained by such analysis.
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	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 type="checkbox"/> No The proposals have been developed by NGESO, with stakeholder input. NGESO is in the best position to determine their sufficiency. The proposals do rely on much appropriate action and response by others than NGESO and NGESO needs to undertake constant surveillance and assurance on others' continuing ability to fulfil their roles.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Partially yes to the first question and no to the second. There is an uncertain relationship between transmission demand and the needs and expectations of customers, as significant proportion of overall GB demand is often met by embedded sources – the majority of which NGESO can forecast.
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 See 9.
11	Do you see any barriers for Network Operators and Users to deliver the changes	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	proposed to implement the ESRS by December 2026?	<p>Key parts of the process are still only just emerging from trials stages. For example the draft functional specification for a DRZC has only just been published, and the market, and DNO processes, for procuring has not yet been tested, let alone the engineering challenges of installing and commissioning, along with all the other network (and customers' plant) changes that are necessary.</p> <p>It will be important to keep an appropriate project management approach in place to ensure that NGESO's target for ESRS implementation by December 2026 can be met.</p>
12	Do you believe there are further changes to the network i.e. NETS and/or Distribution Network required to implement ESRS obligations?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>There is still much uncertainty as to what will be required, especially for DRZCs – the creation of DRZCs is bound to require network changes in DNOs' systems. The extent of these will only be known when each DRZ is planned in detail.</p>
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)	<p><input type="checkbox"/> Scenario 1 <input type="checkbox"/> Scenario 2</p> <p>Both are equally realistic. Scenario 1 is essentially business as usual; scenario 2 is the scenario for a system shutdown – and as such should be the focus of ESRS preparedness.</p>
14	What are your views on the scope of the parties being impacted by the mandatory changes proposed as part of GC0156?	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>There probably remains confusion over the ESRS rôle of aggregators and other CUSC parties without physical assets. In light of the REV project undertaken by Sygensys for NGESO, there seems a lot more to do on the ESRS aspects of widely distributed resources.</p>
15	The GC0156 proposed solution 72 hrs resilience is expected to be applied retrospectively to existing CUSC parties. Do you agree	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	with this retrospective application and if not, what is your rationale / view about this?	As per Q14 we do not believe the case has been made to apply the GC0156 resilience requirements to CUSC parties without physical assets.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
18	Are there any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting?	No comment – that is probably a matter for prospective new entrants to comment on.
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?	Given the assurance activities were developed by NGESO and the workgroup, they are probably sufficient for the time being but we would expect NGESO to keep these under constant review given the ongoing developments in the ESRS space.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No As per Q11, the requirements that are currently foreseen seem to have been incorporated. We expect that future requirements may arise based on emerging experience.
21	Due to comments received from some Workgroup members on Appendix 9 (technical requirements associated with restoration	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes – whilst we note that these requirements can be dealt with through the contracting process, we agree that

	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?	they would be better being in a governed document. A RES would seem to fulfil that rôle. If such work is started, it would be very helpful for DNOs' understanding and preparedness if suitable DNO representatives could be included.
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 We would only note that the organization of such tests is non-trivial – but agree they will be an essential part of the assurance process.
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 Initially this seems completely appropriate. As more experience of ESRS (and DSO operations more generally) it may be appropriate to review this in the future.
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 ii) a tripartite agreement that binds the embedded restoration service provider to the relevant parts of the Grid and Distribution Codes.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We accept that this seems the most pragmatic way to ensure essential co-ordination between the parties at the moment and noting that in the unfortunate event of any conflict in documentation etc, the D Code requirements must take precedence for distribution connected parties. In the longer term other arrangements may come to be more appropriate.

	Do you see any difficulties with this proposed contractual arrangement?	
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 checked="" type="checkbox"/> No</p> <p>For the present it is inappropriate to include parties without physical plant. As per Q14 we would expect much development in this space in the coming years</p>
26	As a stakeholder, are there any implications of the proposed future requirements which are not clear?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>It is hard to be sure that “No” is definitive – there is so much that is new and uncertain. But as far as putting a stake in the ground to drive the process forward, we are content for the time being.</p>
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?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Most of the requirements only become requirements on the award of contracts – so they do not need specific introduction timelines.</p> <p>The 72 hour resilience issues are retrospective – so there needs to be a grace period for non-compliant installations to become compliant.</p>
28	Do you agree with Ofgem's proposed approach to the DNO ESR re-opener?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>