

**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>	Dr Peter Couch
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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:**

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- 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);*
- 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;*
- 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*
- 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?	Mark the Objectives which you believe each solution better facilitates: Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <b>No Comment</b>
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>No Comment</b>
3	Do you have any other comments?	<b>No Comment</b>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>No Comment</b>

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
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 <b>No Comment</b>

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 type="checkbox"/> Yes <input type="checkbox"/> No <b>No Comment</b>
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 <b>No Comment</b>
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
11	Do you see any barriers for Network Operators and Users to deliver the changes proposed to implement the ESRS by December 2026?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p><i>The observations noted here are provided by the representatives of the ENA-STG that were actively involved in the GC0156 Communications Infrastructure Working Group.</i></p> <p><b>Annex 7 – Distribution Restoration Zone Control System Standard</b></p> <p><i>We have provided detailed comments / observations within the document (embedded below), but as drafted the specification is not fit for purpose as it fails to specify in any terms the DRZC system. It focuses solely on the communications requirement with absolutely no reference to the requirements of the DRZC system.</i></p> <p><i>Such a standard should be the basis against which a DNO develops a tender for a DRZC system and against which the DNO (and ESO given the triparty nature of a subsequent tender award) would evaluate the bids from competitive suppliers. It should as a minimum describe the high-level requirements of the “system” and include as a minimum a list of all required elements in scope to create the system.</i></p>

		<p><i>As the document is currently drafted only the DNO that has been involved in the Synergy<sup>1</sup> project would have the requisite understanding required to draft a tender for a DRZC system. If the ESO were to publish the specification as is then no other DNO would be able to procure a DRZC system due to the lack of defined requirements / specification.</i></p> <p><i>Detailed Comments in document embedded here;</i></p> <div data-bbox="802 539 855 600" data-label="Image"> </div> <p>Annex 7 - Distribution Restorati</p> <p><b>8. ESRS – WG Reports Recommendations Summary</b>  Section 1. Recommendations from Communications Infrastructure Working Group Report  <i>In summary these recommendations are not an agreed output of the Communications Infrastructure Working Group. They were not tabled, discussed or ratified by that working group before it was disbanded. They are the ESOs perspective of what the recommendation should be from the Communications Infrastructure Working Group. The vast majority of these recommendations don't feature in the GC0156 Communication Infrastructure Subgroup Report. They do however correspond with some of the recommendations from the Distributed ReStart Project reports. Specifically, the need for ICCP links was not established as a requirement for ESRS in the context of the GC0156 Communications Working Group deliberations</i></p> <p><i>In terms of what recommendations should be included, several of the DNOs at the time of the GC0156 Communication Infrastructure Working Group requested that a separate working group be established to consider the definition of the functional requirements of a DRZC system and the subsequent tolerance range of the key parameters of the entire DRZC system (of which communications is a small constituent part). Is this what is contemplated in the ESO recommendation in <b>BOLD</b> at the end of section 1 of the ESRS Working Group Recommendations Summary Report.</i></p>
12	Do you believe there are further changes to the network i.e. NETS and/or Distribution Network required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<sup>1</sup> Synergy – the field trial undertaken by SPD following the Distributed ReStart lab trial.

	to implement ESRS obligations?	
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 <b>No Comment</b>
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 <b>No Comment</b>
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 <b>No Comment</b>
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 <b>No Comment</b>
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 <b>No Comment</b>
18	Are there any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting?	<b>No Comment</b>

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?	<b>No Comment</b>
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 checked="" type="checkbox"/> No
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  No Comment but we do note in the <b>ESRS - WG Reports Recommendations Summary</b> report that a further Communications sub-group is to be established.
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) /	<input type="checkbox"/> Yes <input type="checkbox"/> No  <b>No Comment</b>

	OC5.7.2.3(d)? If so, do you have a view on this test?	
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 <b>No Comment</b>
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 <b>No Comment</b>
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 <b>No Comment</b>

26	As a stakeholder, are there any implications of the proposed future requirements which are not clear?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>See response to Q. 11</b>
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 type="checkbox"/> Yes <input type="checkbox"/> No <b>No Comment</b>
28	Do you agree with Ofgem's proposed approach to the DNO ESR re-opener?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>No Comment</b>