

**Workgroup Consultation Response Proforma****GC0148: Implementation of EU Emergency and Restoration Code Phase II**

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 27 April 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 Sally Musaka [sally.musaka@nationalgrideso.com](mailto:sally.musaka@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto: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 in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution better facilitates:</p> <p>Original      <input type="checkbox"/>A    <input type="checkbox"/>B    <input checked="" type="checkbox"/>C    <input checked="" 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>The proposed process for changes to the System Restoration Plan, System Defence Plan and Test plan appears to be similar to the current RES process. I would suggest the proposed Test plan process should be used in-principle for all 3 documents in that they all should go out for 1 month consultation then either go to the Panel or Authority as appropriate for a decision.</p> <p>Comments on legal text GC.16.2 suggested text change "If a User or The Company, wishes to raise a change to the System Defence Plan, System Restoration Plan or Test Plan <del>they it</del> shall notify the Panel Secretary of the <del>proposed wish to so</del> change to the System Defence Plan, System Restoration Plan or Test Plan.</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- GC0148		
5	Do you think it is appropriate to include the Distributed Restart amendments within this modification bearing in mind such proposals would fall under the EU	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p>

	<p>Emergency and Restoration Code, or do you think that the Distributed Restart legal text should be transferred to GC0156, so that it can be finalised in the context of the ERSR requirements? Please provide a rationale for your response.</p>	<p>Given that Distributed Restart is still on-going and is no scheduled to finish until the summer, it would be better to wait until it has been completed before finalising the solution and as such would be better dealt with in GC0156.</p>
<p>6a</p>	<p>The DR legal text has been drafted on the basis that i) there will be a Connection Agreement with the DNO that binds an embedded RSP to the DCode and ii) a Tripartite Agreement that binds the embedded RSP to the relevant parts of the GCode and DCode. Do you see any difficulties with this proposed contractual arrangement?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>Not specifically with this agreement, but there is question as to how the different service providers fit into this service. Given there must be an anchor generator will their contract only be issued on the bases that there are other top-up service providers available to provide these additional services or could they be by themselves? If the service is dependant on the anchor &amp; a top-up service provider will they have individual contracts or will these also be combined? What happens if the service cannot be delivered due to a single party ie the Anchor Generator, Top-up service provider or the DNO how are the other treated?</p>
<p>6b</p>	<p>The DR legal text has been drafted on the basis that NGENSO will lead on the procurement of RSs. This is one of the three implementation methods developed in the Distributed Restart project as described in section / annex 11 of this consultation. Do you agree that this is the most appropriate way to implement Distributed Restart, or should one of the</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

	alternative approaches be developed? Please provide a rationale for your response	
7	Do you believe Distribution Network Operators, Significant Grid Users, Defence Service Providers and Restoration Service Providers have adequate resilience of their critical tools and facilities as detailed in EU NCER Article 42(1)(2) and (5) as drafted in the legal text in Annex 8 Please provide your rationale. Do you believe that the NCER requirements have been correctly interpreted in the proposed legal text?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>Where it states The Company in the definitions it seems to refer to control equipment which might be TO equipment. How are the differences between the ESO and TOs equipment being dealt with or included?</p> <p>Does</p> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>Looking at the definition of critical tools it's not entirely clear how the redundancy requirements in CC.7.10.2 &amp; ECC.7.10.2 apply? If you take the example of a tap-changer do you now need 2 cables to the tap-changer, similarly 2 button or 2 motors?</p>
8	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 is generally standard in GB for existing black start purposes and is being proposed as part of the ESRS work?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>72 hours is the better option as in the event of a black out event power might on be restored within the 24 hours. However there is a further question the new blackstart standard potentially does not get all supplies back into service until 5 days</p>
9	Do you believe the approach proposed of introducing non-CUSC parties under the framework of the NCER (i.e. non-CUSC parties who have a contract with the ESO as defence service providers and/or restoration service	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>All parties who are able to provided services need to be used.</p>

	providers) is an appropriate solution going forward? If not please explain why you believe this is the case.	
10	Do you have any comments on the draft distributed restart contracts in Annex 15?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  In section 6.2.3 where is the ten seconds coming from this is dependent on droop and other factors.  Section 9 (both anchor & top-up) on safety and indemnity, it's difficult to see how the anchor generator can be completely responsible for off-site situations when they are not in control of what plant and apparatus is being connected. They are not familiar with remote protection settings or fault levels, they can be responsible for faults triggering their protection but remote protection has to be access by the network operator.
11	Do you have any comments on the notification letters in Annex 7?	<input type="checkbox"/> Yes <input type="checkbox"/> No  Currently as drafted these letters suggest parties will not need to do anything, but I am not sure this will be the case at the end of this process.