Code Administrator 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 **09 June 2023**. 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 Milly Lewis Milly.Lewis@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Alastair Frew	
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Which best describes your organisation?	☐Consumer body ☐Demand ☐Distribution Network Operator ☒Generator ☐Industry body	☐Interconnector ☐Storage ☐Supplier ☐Transmission Owner ☐Virtual Lead Party ☐Other

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 Code Administrator Consultation questions							
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution(s) better facilitates:					
		Original	☐A	☐B	☒C	☐D	☐E
		WAGCM1	☒A	☒B	☒C	☒D	☐E
		In terms of the original we believe it does not better facilitate objective A as it mandates changes on everyone and does not consider that it might be more economical and efficient to allow the market to offer up the parties which are best suited to provide services. It is neutral on objective B. It improves objective C as it introduces more requirements which should improve system security. It is negative on objective D as this mandates changes on everyone whereas the Network Code on Electricity Emergency & Restoration requires in Article 4 paragraph 1 c “apply the principle of optimisation between the highest overall efficiency and lowest total costs for all parties involved;” and in paragraph 1 d “ensure that TSOs make use of market-based mechanisms as far as is possible to ensure network security and stability;”. Finally, it is neutral against objective E. In terms of the WAGCM1 we believe it does better facilitate objectives A, B & D as it allows the market to offer up the parties which are best suited to provide services that are more economical and efficient. It improves objective C as it introduces more requirements which should improve system security. Finally, it is neutral against objective E.					
2	Do you have a preferred proposed solution?	☐Original ☒WAGCM1 ☐No preference					
		We see the requirements in the original modification for all generators to start within their cold stat times as a significant request for most sites, not only in terms of					

		equipment but also in staffing and finally costs. In terms of achieving current cold start times, we cannot see how parties, who are correctly quoting their cold start times, can then add a whole lot of additional tasks to re-energise their power station firstly before then starting their units can be fitted into their original cold start time. This will be a particular problem with sites where there are no temperature effects, and the cold times are the same as the hot start times and these are very short. WAGCM1 is a better option as it firstly asks additional questions in the DRC to try and force generators to fully assess their current capabilities if all external power supplies are lost and then provide more realistic start up times. This would have the benefit that the ESO would have a better idea of the current situation and then be able to assess additional requirements and the best commercial method of procurement.
3	Do you support the proposed implementation approach?	We do not completely support the implementation approach of the original as although there is some protection which means parties do not immediately become non-compliant they will very quickly need to enter into the derogation process. We are happier with the implementation approach of WAGCM1.
		Click or tap here to enter text.
3	Do you have any other comments?	Our general option is there still needs to be much more detailed planning on how the ERS standard is actually going to be achieved should a Total Shutdown occur. Currently this modification only deals at very high level and assumes all parties are just going to be capable of doing what they are told, without any real assessment of their capabilities or abilities.