

Workgroup Consultation Response Proforma

CM089: 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 stcteam@nationalgrideso.com by **5pm on 18 May 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 stcteam@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Lewis Morgan
Company name:	National Grid Electricity Transmission
Email address:	Lewis.Morgan@nationalgrid.com
Phone number:	07974640307

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 STC Objectives are:

- a) *efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- b) *development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- c) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- d) *protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*
- e) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

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> <table border="1" data-bbox="619 414 1455 470"> <tr> <td data-bbox="619 414 853 470">Original</td> <td data-bbox="853 414 933 470"><input checked="" type="checkbox"/>A</td> <td data-bbox="933 414 1013 470"><input type="checkbox"/>B</td> <td data-bbox="1013 414 1093 470"><input type="checkbox"/>C</td> <td data-bbox="1093 414 1173 470"><input checked="" type="checkbox"/>D</td> <td data-bbox="1173 414 1252 470"><input type="checkbox"/>E</td> <td data-bbox="1252 414 1332 470"><input type="checkbox"/>F</td> <td data-bbox="1332 414 1455 470"><input checked="" type="checkbox"/>G</td> </tr> </table> <p>A –Positive We agree that the ESO transmission license change requires STC modifications.</p> <p>B – Negative The proposal will impact network planning and outage coordination for and across network users. This has potential to make system access more challenging in respect to development and maintenance of assets. Assurance activities will also result in increased transmission network and user system outages with complex coordination requirements.</p> <p>C –Neutral We do not believe that this modification better or worse facilitates this, although we accept that it supports the GC0156 modification which does aid this objective.</p> <p>D - Positive Fundamentally we believe the proposal improves performance against the objective. Although the changes do not allow targeted, economically justified investment / interventions.</p> <p>E- Neutral</p> <p>F – Neutral</p> <p>G - Positive</p>	Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input checked="" type="checkbox"/> G
Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input checked="" type="checkbox"/> G			
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes</p> <p><input type="checkbox"/>No</p>								
3	Do you have any other comments?	<p>Whilst recognising the 2026 requirements of ESRS, We believe that the requirement to asses, design and deliver asset interventions, some of which will require system access is not achievable within the proposed regulatory framework. We believe that network interventions / investment should be targeted with cost benefit analysis and that the code does not offer this flexibility as currently written, particularly where the conditions of CC / ECC 7.10 / 7.11 are referenced.</p>								

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
		Click or tap here to enter text.
Specific Workgroup Consultation questions		
5	Do you believe there are any further changes required to the STC based on the proposed changes to the Grid Code as part of GC0156?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No