

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 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 or grid.code@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Priyanka Mohapatra
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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 checked="" type="checkbox"/>A <input type="checkbox"/>B <input 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 type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>SPR believe the proposal covers various disparate changes which will affect generators and DNOs in many ways and adds to clarity regarding LFDD and storage operation mode from import to export mode.</p> <p>However, we do not support inclusion of Distributed ReStart outcomes in this grid code modification as it the proposal was initiated and largely implemented prior to the commencement of ESRS working groups. The discussion and considerations regarding Distributed ReStart outcomes from ESRS working groups are not considered in this proposal.</p>
3	Do you have any other comments?	Click or tap here to enter text.
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 checked="" type="checkbox"/>Yes – It should be transferred in whole to GC 0156 <input checked="" type="checkbox"/>No – It should not be included in GC 0148</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>	<ol style="list-style-type: none"> 1. Distributed Restart project technical report shows the project was largely conducted in Scotland using non-embedded 11/33 kV at PoC 132 kV connected generators, which are non-embedded. It shows Distributed ReStart concept can also be applied to small/medium transmission connected generators. Implementing and facilitating Distributed Restart outcomes for embedded generators only, will exclude the generators in Scotland that were used in the demonstration of the concept. It is important to appreciate there are multiple transmission connected generators in GB that can provide restoration services as demonstrated in Distributed Restart project. The transmission connected generators cannot comply with the LJRP technical requirements but can act as an Anchor Generator on the transmission network and provide a valuable service. Hence, it is imperative that the outcomes of this project are applied to transmission connected generators as well hence allowing more renewable generators to participated in system restoration process. 2. NG ESO conducted 5 different ERSR working groups between Dec 2021-April 2022. These working groups scrutinised the outcomes from Distributed Restart project and evaluated feasibility of implementation. These discussions and working group suggestions are not reflected in GC 0148 and thus creating a discrepancy in understanding of implementation of the restoration standard. 3. The same applies to restoration plan, communication requirements, as it is not understood how Distributed Restart outcomes will be reflected for renewable generators connected to transmission network as well. <p>SPR proposes Distributed Restart considerations in GC 0148 to move in entirety to GC 0156 modification and holistically viewed for transmission and distribution connected generation.</p>
6a	<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</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>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>SPR envisage tripartite contracts will require complex legal discussions and will involve a lengthier process to reach an agreement. However, we support such agreements, if it allows for DNOs involvement in restoration process and allows for direct communication between generators and DNOs regarding the overall restoration process on their network.</p> <p>SPR requests for additional information regarding the structure of such tripartite contracts.</p>
6b	<p>The DR legal text has been drafted on the basis that NGESO 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 alternative approaches be developed? Please provide a rationale for your response</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
7	<p>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</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>SPR believe DNOs, grid users and defence service providers will need to put in place the required critical tools and facilities to provide restoration service. This will include requirements such as control telephony at distributed generators. It is however unclear where the point of control will be, as currently generators may be controlled from a remote central control centre.</p> <p>In this case, the requirement for resilience will be between the control centre and the site, and the DNO/TO control centre and generator site. The consideration for resilience from generator control centre is missing from Figure 2.0 and 3.0 of the consultation documents. This also adds a level of complexity, which was discussed</p>

	<p>NCER requirements have been correctly interpreted in the proposed legal text?</p>	<p>extensively in ESRS communication working group, however not included in the GC 0148 modification.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
8	<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 is generally standard in GB for existing black start purposes and is being proposed as part of the ESRS work?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>SPR concurs the requirement for resilience should be same as the GB standard for black start. However, we consider this requirement to be too onerous, given the standard itself requires 60% of the system to be restored within 24 hours. We will request NG ESO to reconsider this requirements for all standards, as it will require large batteries to be installed or large amounts of diesel to be stored at various generator sites, which might prove uneconomical and unfeasible for many generator owners.</p>
9	<p>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 providers) is an appropriate solution going forward? If not please explain why you believe this is the case.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

10	Do you have any comments on the draft distributed restart contracts in Annex 15?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.
11	Do you have any comments on the notification letters in Annex 7?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.