

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:	Andy Hood
Company name:	Western Power Distribution
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Phone number:	07810054693

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 checked="" type="checkbox"/>B <input checked="" type="checkbox"/>C <input checked="" type="checkbox"/>D <input checked="" 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?	No
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 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><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Distributed restart amendments could be included in either the GC0148 or GC0156 proposals.</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 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>	<div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <p>This Western Power Distribution's current approach to flexibility services.</p> </div>
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>	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <div> <p>NGESO are best placed to lead on the procurement of restoration services, however, due regard must be given to the capability, capacity and the efficiency of the <u>whole</u> network, including the distribution network. Procurement of such services must not sterilise the distribution network and prevent other distributed load/generation from being connected.</p> </div>
7	<p>Do you believe Distribution Network Operators, Significant Grid Users, Defence Service Providers and Restoration Service Providers have adequate resilience of</p>	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <div> <p>Click or tap here to enter text.</p> </div>

	<p>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?</p>	<p>Additional consideration (and perhaps a future modification) is required to ensure article 15(6) is fully addressed, i.e. to ensure LFDD relays account for load behaviour and dispersed generation</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 type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Question is ambiguous. I think 72 hours is appropriate rather than 24 hours</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>Due regard must, however, be given to the capability, capacity and the efficiency of the <u>whole</u> network, including the distribution network. Such contracts must not sterilise the distribution network and prevent other distributed demand/generation being connected.</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 No comment
11	Do you have any comments on the notification letters in Annex 7?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No No comment