

Code Administrator 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 5 September 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: | Antony Johnson |
| Company name: | National Grid ESO |
| Email address: | Antony.Johnson@nationalgrideso.com |
| Phone number: | 07966 734856 |

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 | Do you believe that the GC0148 Original Proposal, WAGCM1 or WAGCM2 better facilitates the Applicable Objectives? | Mark the Objectives which you believe each solution better facilitates: | | | | |
| | | Original | <input checked="" type="checkbox"/> A | <input checked="" type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input checked="" type="checkbox"/> D <input type="checkbox"/> E |
| | | WAGCM1 | <input type="checkbox"/> A | <input type="checkbox"/> B | <input type="checkbox"/> C | <input type="checkbox"/> D <input type="checkbox"/> E |
| | | WAGCM2 | <input checked="" type="checkbox"/> A | <input checked="" type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input checked="" type="checkbox"/> D <input type="checkbox"/> E |
| <p>We support the Original and WAGCM2, although on balance we prefer the Original. We do not support WAGCM1 as this only defines the Emergency, Blackout and Restoration States and there is no definition of Normal or Alert States; noting that the Transmission System will eventually return to either normal or alert state and therefore a definition of these needs to be included as this is part of the messaging that will need to be shared on BMRS – therefore WAGCM1 is unimplementable. Other than this slight difference WAGCMs 1&2 are identical.</p> <p>This modification implements the outstanding elements of the EU Emergency and Restoration Code which in the drafting of the European Code has a compliance deadline of 18 December 2022. Since the Emergency and Restoration Code is retained in GB law through Statutory Instrument SI 533 2019 this modification satisfies Grid Code objective (d).</p> <p>The Emergency and Restoration Code seeks to provide greater system resilience by requiring TSOs to produce system defence and restoration plans and to set out the requirements on Users to participate in these. Within this modification, this also includes enhanced measures on storage providers, updates to critical tools and facilities in addition to providing greater opportunity for non-CUSC parties to provide defence and restoration services. Improved measures to restore the System following a Partial System Shutdown or Total System Shutdown through enhanced critical tools and facilities, improved communications systems, improvements to the System Defence Plan and Test Plan are also included. In this respect this modification facilitates Grid Code objectives (a), (b) and (c).</p> <p>We also support this modification as a precursor to the wider Electricity System Restoration Standard work which</p> | | | | | | |

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| | | is currently being progressed through Grid Code modification GC0156. |
| 2 | Do you support the proposed implementation approach? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes – We believe the implementation approach satisfies the requirements of the EU Emergency and Restoration Code; it makes the system more robust and resilient to disturbances and achieves compliance with the Emergency and Restoration Code in a timely manner. |
| 3 | Do you have any other comments? | <p>We would note in our preference for the original over WAGCM2 that we have already made a commitment to share any change in system status to Emergency, Blackout or Restoration on BMRS without a code obligation. Our concern in making it a code obligation is that some emergency conditions can be very transient making compliance difficult; and also that during an emergency situation the Control Room will be under a great deal of pressure. While communication during an emergency is a key requirement in managing a situation a code obligation in this area might not be a helpful addition.</p> <p>We would note further that there are a range of reasons why the system could enter the emergency state in particular. The messaging of this may need careful management to avoid misreporting as highlighted in the recent Ofgem decision to reject modification GC0133 and again, a code obligation may not be helpful in removing any flexibility or discretion that the ESO would otherwise have in a particular set of circumstances.</p> |