Workgroup 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](mailto:grid.code@nationalgrideso.com) by **5pm** on **09 December 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 Banke John-Okwesa [banke.john-okwesa@nationalgrideso.com](mailto:banke.john-okwesa@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

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| --- | --- |
| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |

**I wish my response to be:**

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| (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:**

1. *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
2. *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);*
3. *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;*
4. *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*
5. *To promote efficiency in the implementation and administration of the Grid Code arrangements*

**Please express your views using the tick boxes and text box spaces provided in the right-hand side of the table below.**

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| **Standard Workgroup Consultation questions** | | | |
| 1 | Do you believe that the Original Proposal better facilitates the Applicable Objectives? | Mark the Objectives which you believe each solution better facilitates: | |
| Original | A B C D E |
| WAGCMX | A B C D E |
| Click or tap here to enter text. | |
| 2 | Do you support the proposed implementation approach? | Yes  No | |
| Click or tap here to enter text. | |
| 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? | Yes  No | |
| Click or tap here to enter text. | |

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| **Specific Workgroup Consultation questions** | | |
| 5 | Do you believe that a cost benefit analysis should be undertaken by the Workgroup and if yes what factors should be considered? | Yes  No |
| 6 | Do you believe that parties obligated by GC0156 should have a cost recovery mechanism in place? | Yes  No |
| 7 | Do you agree that the draft legal text is appropriate and sufficient to implement GC0156?  If not please provide your suggestions? | Yes  No |
| 8 | The GC0156 proposed solution would be applied retrospectively to existing assets.  Do you agree with this retrospective application and if not, what is your rationale / view about this? | Yes  No |
| 9 | Are they any barriers to new entrants to provide restoration services that are not covered in the GC0156 legal drafting? | Yes  No |
| 10 | 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 a general GB standard for existing black start purposes as proposed as part of the ESRS work for all BM parties?  Do you agree with a retrospective application of this and if not, what is your suggestion / views about this? | Click or tap here to enter text. |
| 11 | As a stakeholder, are there any implications of the proposed future requirements which are not clear? | Yes  No |
| 12 | Do you think that the proposals will help restore customer supplies as soon as possible? | Yes  No |
| 13 | Do you think that the proposals are sufficient to ensure that NGESO can meet its ESRS licence obligations? | Yes  No |
| 14 | Do you think that there is a common understanding between stakeholders of the demand to be restored in GB required by ESRS? | Yes  No |
| 15 | The distributed restart legal text has been drafted on the basis that NGESO will lead on the procurement of restoration services. Do you think this should move to DNO led in future? If yes, please explain why | Yes  No |
| 16 | Do you believe the approach proposed to introduce non-CUSC parties under the framework of the NCER (i.e. non-CUSC parties who have a contract with the ESO as restoration service providers) is an appropriate solution going forward? If not, please explain why you believe this is the case. | Yes  No |
| 17 | Do you agree that all the costs associated with TO/DNO implementation of ESRS should be recovered through their respective price controls? If not, what funding mechanism do you favour? | Yes  No |
| 18 | Do you believe that cyber security requirements in accordance with the NIS standard are sufficient and should be referenced in the Grid Code? | Yes  No |
| 19 | Do you see any barriers for Network Operators and Users to deliver the changes proposed to implement the ESRS by December 2026? | Yes  No |
| 20 | Do you think the right requirements have been identified for Network Operators in terms of Network design and operational capability as summarised in the consultation document and described in detail in the proposed legal text in CC/ECC.6.4.6.3b?  OC9.1.1, OC9.2.1, OC9.4.7.5.1 (b)(x); OC9.4.7.5.1 (c)(xi); OC9.4.7.5.2 (a)(xii); OC9.4.7.5.2 (b)(xii); | Yes  No |
| 21 | Do you believe there should be further assurance activities in addition to those described in the proposed legal text within OC5? If yes, please state the activity and explain why. | Yes  No |
| 22 |  | Yes  No |
| 23 | Do you believe there are further changes to the network i.e NETS and/or Distribution Network required to implement ESRS obligations? | Yes  No |
| 24 | The distributed restart legal text has been drafted on the basis that  i) there will be a connection agreement with the DNO that binds an embedded restoration service provider to the Distribution Code and  ii) a tripartite agreement that binds the embedded restoration service provider to the relevant parts of the Grid and Distribution Codes.  Do you see any difficulties with this proposed contractual arrangement? | Yes  No |
| 25 | Do you have any views on how the requirements should be implemented into the Grid Code bearing in mind the requirements of the ESRS are not enforceable until 31 December 2026. | Yes  No |