

Grid Code Alternative and Workgroup Vote

GC0156: Facilitating the Implementation of the Electricity System Restoration Standard

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 1 - Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative Grid Code Modifications (WAGCMs).

Stage 2 - Workgroup Vote

2a) Assess the Original and WAGCMs (if there are any) against the Grid Code objectives compared to the baseline (the current Grid Code).

2b) Vote on which of the options is best.

Terms used in this document

Term	Meaning
Baseline	The current Grid Code (if voting for the Baseline, you believe no modification should be made)
Original	The solution which was firstly proposed by the Proposer of the modification
WAGCM	Workgroup Alternative Grid Code Modification (an Alternative Solution which has been developed by the Workgroup)

The Applicable Grid Code Objectives:

- 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

Workgroup Vote

Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative Grid Code Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chair believe that the potential alternative solution would better facilitate the Grid Code objectives than the Original proposal then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative Grid Code modification (WAGCM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

“Y” = Yes

“N” = No

“-“ = Neutral (Stage 2 only)

“Abstain”

Workgroup Member	Alternative 1 (Drax, No retrospective application)
Alastair Frew	Y
Andrew McLeod/Alan Creighton	Y
Andrew Vaudin	Y
Bill D’Albertanson	Y
Garth Graham	Y
Graeme Vincent	Y
Graz Macdonald	Y
Gwyn Jones	Y
Michelle Macdonald	-
Priyanka Mohapatra	Y
Robert Longden	Y
Sade Adenola/Tony Johnson	N
Tolu Esan/Gavin Anderson	Y
WAGCM1	

Stage 2a – Assessment against objectives

To assess the Original and WAGCMs against the Grid Code objectives compared to the baseline (the current Grid Code).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

AGCO = Applicable Grid Code Objective

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Alastair Frew – Drax					
Original	No	Neutral	Yes	No	Neutral	No
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes
<p>Voting Statement:</p> <p>I see the requirement in the original modification for all generators to start within their cold start times as a significant request for most sites, not only in terms of equipment but also in staffing and finally costs. In terms of achieving current cold start times I cannot see how parties, who are correctly quoting their cold start times, can then add a whole lot of additional tasks to re-energise their power station firstly before then start the units can be fitted into their original cold start time. This will be a particular problem with sites where there is no temperature effects and the cold times are the same as the hot start times and these are very short.</p> <p>One of the key problems with this workgroup is the ESO is keeping everything secret and we are unaware of the actual “restoration plan” hence we do not know what volumes are actually required and how quickly this is required, it would also have been useful if we knew the current plant capabilities.</p> <p>WAGCM1 is a better option as it firstly asks additional questions in the DRC to try and force generators to fully assess their current capabilities if all external power supplies are lost and then provide more realistic start up times. This would have the benefit that the ESO would have a better idea of the current situation and then be able to assess additional requirements and the best commercial method of procurement.</p>						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Andrew McLeod – Northern Powergrid					
Original	Yes	No	Yes	Neutral	Neutral	Yes
WAGCM 1	Yes	Yes	Yes	Neutral	Neutral	Yes
<p>Voting Statement:</p> <p>I (as the voting member in conjunction with Alan Creighton and Cefin Parry) believe the Original and WAGCM1 both facilitate NGESO fulfilling their obligations under the ESRS, however the WAGCM (i.e. essentially the Original without retrospective application) is more likely to be implemented within the target timescale. Under the WAGCM, the System Operator</p>						

will need to undertake an assessment of whether the current resilience arrangements of the existing generation fleet (whether contracted to provide restoration services or not) are sufficient or whether there is a need to target expenditure, or contract for further restoration services, to resolve any issues which arise. I (as the voting member in conjunction with Alan Creighton and Cefin Parry) believe that this is more efficient than requiring all generators to comply with a blanket standard.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Andrew Vaudin – EDF Energy					
Original	Yes	Neutral	Yes	Yes	Neutral	Yes
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes
Voting Statement:						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Garth Graham – SSE Generation					
Original	Yes	No	No	No	No	No
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes

Voting Statement:

In examining the Original (as well as the Alternative and Baseline) I am mindful of the need to comply with the legal obligations, as set out in the retained GB law, and in particular Article 4 Paragraph 1, when looking to incorporate the ESRs requirements within the Grid Code.

In that regard I note what the proposer of the WAGCM identified, to the Workgroup, that:

“article 4 paragraph 1(d) does require that the System Operator shall *“ensure that TSOs make use of market-based mechanisms as far as is possible to ensure network security and stability”* and it is not clear that this is being achieved by the Original Modification Proposal.”

I would add that the opening line, of paragraph 1 of Article 4, says the following:

“When applying this Regulation, Member States, **regulatory authorities**, competent entities and **system operators shall**.” [emphasis added]

Therefore the legal obligation (a ‘shall’ rather than a ‘may’) is to make use of market-based mechanisms as far as is possible and this obligation applies equally to both the ESO and the Authority.

As the ESO has repeatedly pointed out to the Workgroup (and the four Working groups established by the ESO ahead of raising GC0156) they expect to be contracting with just Anchor and Top-Up providers to the equivalent of 10% or less of the overall market.

The conclusion to be drawn from this is that by not making use of market based mechanisms as far as is possible for the provision of restoration services (and thus being contrary to the legal obligations and recitals of ERNC) that GC0156 Original is incompatible with ERNC.

Accordingly, everything else being equal, GC0156 Original is negative in terms of Applicable Objective (d) whilst the Alternative is positive in terms of Applicable Objective (d).

This being the case, as the Original does not better facilitate Applicable Objective (d) it therefore follows that it does not facilitate effective competition (so is not better in terms of the (b) and (c) Applicable Objectives) whilst to introduce into the Grid Code something that was not compatible with the legal obligation would be inefficient (and thus not be better in terms of Applicable Objective (e)).

However, as the Alternative corrects the legal deficiencies (by ensuring market-based mechanisms are used as far as is possible) that are inherent within the GC0156 Original, it is compatible with ERNC and thus is better in terms of Applicable Objective (d) as well as being better in terms of competition (and thus the (b) and (c) Applicable Objectives) and (e) as regards efficiency.

Overall the Original is not better and the Alternative is better.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Graeme Vincent – SP Energy Networks					
Original	Yes	No	Yes	No	Neutral	Yes
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes

Voting Statement:

Whilst both the original and WAGCM1 address the deficiencies identified by the proposer, the retrospective application of resilience requirements to existing generators (which may not be able to achieve the requirements without significant additional investment) has not been sufficiently well evidenced to demonstrate that the original proposal is the most efficient and economical option to achieve the desired outcomes.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Graz Macdonald – Waters Wye					
Original	No	No	Neutral	Yes	No	Neutral
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes

Voting Statement:

I had to vote neutral overall for the original because I recognise that a change is required to meet DESNZ's Restoration Standard and NGESO's licence obligations, otherwise I would have voted "No" overall against the original.

I would have voted "no" against the original proposal overall because of my concerns about the fundamentally inefficient approach of requiring these resilience requirements for all generators regardless of cost or effectiveness. These resilience requirements should not be a default requirement. However, I recognise that NGESO needs to make some changes but overall, it is my view that the original proposal is not an improvement on the baseline.

The CUSC mod CMP398 (GC0156 - Cost Recovery mechanism for CUSC Parties) aims to provide funding for those parties that haven't agreed a contract with NGESO. It is the case that contracted parties will be compensated for providing this service while non-contracted parties will not in the absence of CMP398 approval. However, this mod is not yet approved and may never be approved so cannot be counted on to offset the concerns about GC0156.

It seems clear that it is uncompetitive to pay some people to provide the capability through contracting and not others, especially when the case for the mandatory requirement for all generators has not been adequately demonstrated. This is why I find the original proposal negative against Grid Code objectives a, and b. I voted negative against the original proposal for Grid Code objective e because I find the requirements fundamentally inefficient and cannot give a "yes" where the term "efficient" is included, whatever the context.

For WAGCM1, I believe that the WAGCM addresses my fundamental concerns regarding efficiency and competition.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Gwyn Jones – Western Power Distribution					
Original	Yes	Yes	Yes	Neutral	Neutral	Yes
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes
Voting Statement:						
I feel that this better fits the overall ability of the industry to deliver what's reasonably required of them from December 2026.						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Lewis Morgan – NGET					
Original	No	Yes	Yes	Yes	Neutral	Yes
WAGCM 1	No	Yes	Yes	Yes	Neutral	Yes
Voting Statement:						
Both proposals deliver an increase in industry resilience and will facilitate wider participation / access to ESR markets. In this regard I believe that they promote an increase in competition and security across the national electricity transmission system. This is despite the increased complexity of coordination and technical capability.						

Achieving the required objectives inherently increases the complexity of system access, outage co-ordination and the volume of user system tests, which in our view is slightly to the detriment of developing, maintaining and operating an efficient system.

The original proposal provides a more standardised requirement for complying with “Cold Start” times in the CC / ECC. We recognise that there will be outliers to this standard where the implementation is technically impossible or cost prohibitive and that the alternative proposal seeks to address this variance.

I favour the original proposal as it provides the ESO with the greatest flexibility for implementing restoration strategies and facilitates a derogation processes to address the cost / implementation concerns on a by exception basis.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Michelle Macdonald – SSEN Transmission						
Original	Yes	Yes	Yes	Yes	Yes	Yes
WAGCM 1	Yes	No	No	Yes	No	No

Voting Statement:

I believe the Original Proposal better facilitates the five grid code objectives (a, b, c, d, e), as it applies the Electricity System Restoration obligations consistently amongst all involved.

I do not support the Alternative Proposal (WAGCM 1), as I believe it doesn't better facilitate the objectives compared to the baseline or the Original.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Priyanka Mohapatra – Scottish Power						
Original	Yes	No	Yes	Yes	Neutral	No
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes

Voting Statement:

I believe the need for resilience for existing generators has not been sufficiently evidenced by NGESO. There are considerable gaps in understanding of restoration plans that will be constituted around existing generators. In light of this, it is a burden on GB customers and developers in terms of cost of implementation, without a detailed CBA highlighting the need for it. WAGCM1 better facilitates the original objectives of GC0156 without adding unnecessary requirements for existing generators.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Robert Longden – Cornwall Insight						
Original	Yes	No	Yes	No	Neutral	Yes
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes

Voting Statement:

GC0156 is required to implement the restoration standard. As such both the Original and the Alternative are better than the baseline.

The Original takes an inappropriate approach in requiring all generators to be compliant with the requirements, regardless of the cost to the individual party, or the Restoration benefits to the overall system that they may be able to provide.

The Alternative (WAGCM1) does not require existing Generators to retrospectively modify their plant to meet a “blanket” requirement. It correctly places the responsibility on the ESO to use a commercial route to achieve its Restoration obligations through appropriate Anchor & Top-Up services contracts.

WAGCM1 is the preferred option.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Sade Adenola – ESO						
Original	Yes	Yes	Yes	Yes	Neutral	Yes
WAGCM 1	No	Yes	No	Yes	Neutral	No

Voting Statement:

I support the Original in facilitating the implementation of the Electricity System Restoration Standard. The Original facilitates Grid Code objectives a), b) and c) and in particular d) which is necessary to implement the Electricity System Restoration Standard which has been introduced into special condition 2.2 of the ESO’s Transmission License. In addition, ESO modelling have shown that significant network resilience is required to ensure a state of readiness across GB, to support restoration once external supplies are re-established.

I do not support WAGM1. I agree that WAGM1 better facilitates Grid Code objectives b) and d) but I do not believe it supports Grid Code objectives a) and c) in so far of its ability to restore the system in the most economic manner and timely. WAGCM1 also does not guarantee the level of resilience required to facilitate speedy system restoration hence reducing the ESO’s ability to meet the Licence Obligation. That said I would argue that WAGCM1 is better than the baseline.

Overall, I support the Original Solution

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
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	Gavin Anderson on behalf Tolu Esan – Electricity North West					
Original	Yes	Yes	Yes	Yes	Neutral	Yes
WAGCM 1	Yes	Yes	Yes	Yes	Neutral	Yes
<p>Voting Statement:</p> <p>WAGCM1 will not retrospectively require existing generators to modify plant to achieve existing cold start times following loss of site supply. The ESO will be required to procure ESRS fast start services commercially using contracts and it will ensure Generators provide necessary detailed information on current plant capabilities which the ESO can then assess against ESRS requirements, to assist with restoration planning. Thus, this better facilitates the delivery AGCO than the original proposal.</p>						

Of the 13 votes, how many voters said this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	9
WAGCM1	11

Stage 2b – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WAGCM1 or WAGCM2)

Workgroup Member	Company	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Alastair Frew	Drax	WAGCM1	A, b,c,d
Andrew McLeod	Northern Powergrid	WAGCM1	A,b,c
Andrew Vaudin	EDF Energy		
Bill D'Albertanson		-	-
Garth Graham	SSE	WAGCM1	A, b,c,d
Graeme Vincent	SP Energy Networks	WAGCM1	A, b,c,d
Graz Macdonald	Waters Wye	WAGCM1	A, b,c,d
Gwyn Jones		WAGCM1	A, b,c,d
Lewis Morgan	National Grid Electricity Transmission	Original Proposal	b,c,d
Michelle Macdonald	SSEN Transmission	Original	A,b,c,d,e
Priyanka Mohapatra	Scottish Power	WAGCM1	A, b,c,d
Robert Longden	Cornish Insight	WAGCM1	A, b,c,d

ESO

Sade Adenola	ESO	Original	a,b,c,d
Tolu Esan	Electricity North West	WAGCM1	A, b,c,d