

## Code Administrator 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 June 2023**. 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 Milly Lewis [Milly.Lewis@nationalgrideso.com](mailto:Milly.Lewis@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

| Respondent details                             | Please enter your details  |  |
|--|--|--|
| <b>Respondent name:</b>                        | Antony Johnson   |  |
| <b>Company name:</b>                           | National Grid ESO  |  |
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| <b>Phone number:</b>                           | 07966 734856   |  |
| <b>Which best describes your organisation?</b> | <input type="checkbox"/> Consumer body<br><input type="checkbox"/> Demand<br><input type="checkbox"/> Distribution Network<br><input type="checkbox"/> Operator<br><input type="checkbox"/> Generator<br><input checked="" type="checkbox"/> Industry body | <input type="checkbox"/> Interconnector<br><input type="checkbox"/> Storage<br><input type="checkbox"/> Supplier<br><input type="checkbox"/> Transmission Owner<br><input type="checkbox"/> Virtual Lead Party<br><input type="checkbox"/> Other |

**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  | Please provide your assessment for the proposed solution(s) against the Applicable Objectives? | Mark the Objectives which you believe the proposed solution(s) better facilitates:  |                                       |                                       |                                       |                                       |                                       |                            |        |                            |                                       |                            |                                       |                            |
|  |  | <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A</td> <td><input checked="" type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input checked="" type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> <tr> <td>WAGCM1</td> <td><input type="checkbox"/>A</td> <td><input checked="" type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input checked="" type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table> | 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 checked="" type="checkbox"/> B | <input type="checkbox"/> C | <input checked="" type="checkbox"/> D | <input type="checkbox"/> E |
|  |  | 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 checked="" type="checkbox"/> B   | <input type="checkbox"/> C            | <input checked="" type="checkbox"/> D | <input type="checkbox"/> E            |                                       |                                       |                            |        |                            |                                       |                            |                                       |                            |
| <p><b>PLEASE NOTE:- THE ESO'S RESPONSE TO THIS CONSULTATION IS IN TWO PARTS. THIS DOCUMENT IS NON-CONFIDENTIAL AND CAN BE SHARED IN THE PUBLIC DOMAIN.</b></p> <p><b>THERE IS AN ATTACHED DOCUMENT WHICH IS CONFIDENTIAL. THIS IS IN RESPONSE TO A NUMBER OF QUESTIONS THE ESO WAS ASKED BY THE AUTHORITY AND CONTAINS SENSITIVE INFORMATION RELATING TO THE GB RESTORATION PROCESS AND DETAILS OF SPECIFIC PROVIDERS.</b></p> <p>Yes. We support this proposal.</p> <p>We believe this modification implements the provisions necessary to satisfy the requirements and obligations of the Electricity System Restoration Standard in particular Grid Code objective d).</p> <p>The Electricity System Restoration Standard (ESRS) seeks put measures in place to restore the System as soon as possible requiring 60% of Transmission System Demand to be restored in 24 hours and 100% of Transmission Demand to be restored in 5 days. The solution proposed aims to provide greater system resilience and Assurance on Users in addition to recognising the proposal includes arrangements for Distributed Re-Start which is an additional mechanism which can be used in parallel with traditional strategies to Re-start the system in the event of a Total or Partial System Shutdown. In this respect the proposal meets Grid Code objectives a), b), c) and d)</p> |  |   |                                       |                                       |                                       |                                       |                                       |                            |        |                            |                                       |                            |                                       |                            |

|   |  |  |
|---|--|--|
|   |  | <p>Whilst we recognise that the Alternative (WAGM1) would meet Grid Code objectives b) and d) we do not see how the Electricity System Restoration Standard would be efficiently met as the Alternative would require a Restoration Contract with a very large number of Users if the requirements of the Standard were to be met.</p>   |
| 2 | Do you have a preferred proposed solution?           | <p><input checked="" type="checkbox"/>Original<br/> <input type="checkbox"/>WAGCM1<br/> <input type="checkbox"/>No preference</p> <p>We support the original. We do not support the WAGCM1 for the reasons outlined in question 1.</p>   |
| 3 | Do you support the proposed implementation approach? | <p>Yes – We believe the implementation approach satisfies the requirements of the Electricity System Restoration Standard; it makes the system more robust and resilient to disturbances and achieves a much higher level of resilience compared to the current Grid Code baseline. It also recognises the growth of renewable, offshore and distributed generation sources which so far have had limited contribution to restoration.</p> <p>We also support the revised “Send Back” wording for GC0148 which has been integrated into the GC0156 solution.</p> <p>Click or tap here to enter text.</p> |
| 3 | Do you have any other comments?                      | <p>We note a minor typographical error in the Grid Code Glossary and Definitions which refers to the term “Distribution Zone Restoration Plan” instead of “Distribution Restoration Zone Plan”.</p>  |