

Workgroup Consultation Response Proforma**GSR032: Facilitate 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 box.sqss@nationalgrideso.com by **5pm on 20 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 or box.sqss@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Greg Stevenson	
Company name:	Scottish Hydro Electric Transmission (SHET)	
Email address:	Greg.Stevenson@sse.com	
Phone number:	07467397988	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body	<input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <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 SQSS Objectives are:

- i) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;
- ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;
- iii) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and
- iv) facilitate electricity Transmission Licensees to comply with any relevant obligations under EU law.

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 solution better facilitates:</p> <table border="1"> <tr> <td data-bbox="619 275 858 331">Original</td><td data-bbox="866 275 1465 331"> <input type="checkbox"/>i <input type="checkbox"/>ii <input type="checkbox"/>iii <input type="checkbox"/>iv </td></tr> </table> <p>i) We do not believe that the current proposal will facilitate the planning & development of the NETS. The proposed text is qualitative, which doesn't aid the clarity needed to design and fund transmission equipment for Restoration within the regulatory regime. This could be improved by detailing quantitative variables, such as reactive gain, inrush, inertia requirements of the network – aligning the clarity of requirements with Restoration Service Providers.</p> <p>ii) We do not believe that the proposed solution would ensure an appropriate level of security and quality of supply. The needs and requirements for Restoration have been oversimplified in this SQSS change, meaning that it is likely to be ineffective in practical terms.</p> <p>iii) We do not believe that the proposed SQSS changes along with GC0156 & CM089 would facilitate effective competition. There are concerns that “not every generator will be contracted to offer the service” – this does not align with the need to ensure generation can start. We agree that not all services should be contracted, however the fundamental ability to be resilient and then start following a shutdown will be needed within the ESRS. Therefore, this is a significant gap to achieving the ESRS target if generation will not be able to start as the power islands grow. We believe that there is further work to be done separate from the proposed code changes to ensure that the ESRS can be implemented correctly.</p> <p>iv) Paragraph I.1.1 states “Each transmission system shall be designed to facilitate participation in a restoration plan” This will mean that the Restoration Plan, including Restoration Service Providers will need to be available in Transmission Planning timescales, preferably a redacted section of the Electricity Ten Year Statement to ensure we can comply with any relevant obligations.</p>	Original	<input type="checkbox"/> i <input type="checkbox"/> ii <input type="checkbox"/> iii <input type="checkbox"/> iv
Original	<input type="checkbox"/> i <input type="checkbox"/> ii <input type="checkbox"/> iii <input type="checkbox"/> iv			
2	Do you support the proposed implementation approach?	<table border="1"> <tr> <td data-bbox="619 1872 1465 1944"> <input type="checkbox"/>Yes <input checked="" type="checkbox"/>No </td></tr> </table> <p>We do not support the proposed implementation approach as we do not think the proposed solution itself goes far enough. We have provided rationale for this in our response to the objectives above and the Specific Workgroup Consultation</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				

		questions as well as throughout other ESRS code modifications such as GC0156.
3	Do you have any other comments?	

Specific Workgroup Consultation questions		
4	Do you believe it is appropriate to include clarifications within the SQSS to define the system restoration capability requirements as drafted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes, we believe this is needed, however the current proposed change doesn't deliver the clarity needed within the SQSS. Further work needs to be undertaken to define the system restoration capability requirements.
5	Do you believe that there are any further requirements that should be considered during the network design phase?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes, there should be a defined set of design criteria.
6	Is it clear that Appendix I.1.2 applies only to the post restoration plan phase, including energisation of the next user on the network, restoration of auxiliary supplies or subsequent energisation of other parts of the transmission system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes, however in practice this would be needed for all connections including restoration service providers, due to the way that Restoration is procured.
7	Do you believe that clause Appendix I.1.3 (reference to no load gain) is required as part of modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes, however it needs to be a discreet/quantified requirement.