

## NCER SYSTEM DEFENCE PLAN, SYSTEM RESTORATION PLAN AND TERMS AND CONDITIONS AMENDMENT CONSULTATION – RESPONSE PROFORMA

NGESO invites responses to the consultation by **17:00, 10 August 2019**. The responses to the specific questions (below) or any other aspect of the three consultation documents can be provided by completing the following form.

Please complete this form regarding the System Defence Plan, System Restoration Plan and Terms and Conditions proposals for Emergency and Restoration EU Network Code.

Please return the completed form to [box.europeancodes.electricity@nationalgrideso.com](mailto:box.europeancodes.electricity@nationalgrideso.com)

<b>Respondent:</b>	Kathryn Coffin & Steve Wilkin
<b>Company Name:</b>	ELEXON Ltd.
<b>Does this response contain confidential information? If yes, please specify.</b>	No.
<b>Name of Consultation this response is in relation to:</b>	NCER System Defence Plan, System Restoration Plan and Terms and Conditions Amendment Consultation

No	Question	Response (Y/N)	Response
1	Do you agree with the approach taken in the proposal?  Please provide rationale.		No comment.
2	Do you agree that the proposal is consistent with the principle of minimum necessary change?  please provide rationale		No comment.
3	Do you have any other comments in relation to the proposal?	Yes	See our detailed comments below this table.
4	<b>Only for Terms and Conditions Annex 1:</b> Do you have any comments on the mapping?	No	
5	Do you have any other comments in relation to the proposal?	No	

## **ELEXON comments on the Terms & Conditions to act as defence and restoration service providers**

The Terms and Conditions letter states (on page 2) that 'The existing Terms and Conditions for Restoration and Defence Providers ...are comprised of the Balancing and Settlement Code (BSC)', etc. However, we do not believe that there are any such terms and conditions contained within the BSC. The mapping in Annex 1, which has no references to the BSC, only to CUSC and Grid Code alone, supports our view that the BSC does not contain terms and conditions to act as defence and restoration service providers.

The more general terms and conditions for balance responsible parties and balancing service providers are set out separately pursuant to Article 18 of the Electricity Balancing Guideline.

We suggest that the reference to the BSC be removed from the proposal for terms and conditions for Defence Service Providers and Restoration Service Providers.

## **ELEXON comments on the System Defence Plan Issue 2**

The fourth paragraph on page 3 of the System Defence Plan states that 'Many of the provisions contained within this System Defence Plan are already described in the GB national codes (Grid Code, CUSC, BSC, etc.).'

However, there are no other references to the BSC in the draft System Defence Plan so we are unclear whether this reference to the BSC is correct. Under the terms of the BSC, there are provisions covering the provision of information by National Grid ESO covering Demand Control Events. However, these are information requirements for calculating imbalances and imbalance prices in the event of demand control rather than in relation to the preparation or execution of a specific defence plan.

## **ELEXON comments on the System Restoration Plan Issue 2**

We have some comments on the wording of the System Restoration Plan in paragraphs 2.1.7 and 4.1 as follows.

### 1) Paragraph 2.1.7 on page 7

The description of the BSC's Market Suspension Threshold set out in paragraph 2.1.7 is not correct. Paragraph 2.1.7 states that market suspension only occurs where 'under 5% of demand' has been lost. The current rules in BSC section G require that:

- The market is suspended automatically in a Total Shutdown (so the Market Suspension Threshold is not relevant in a Total Shutdown)
- In a Partial Shutdown, the market is only suspended if the Market Suspension Threshold is met. There are 3 circumstances in which the threshold can be met or deemed to be met:
  - the NETSO determines that the spot time Initial National Demand Out-Turn is equal to or lower than 95% of the baseline forecast (this means that 5% or more of demand has been lost – not 'under 5%' as currently stated in the Restoration Plan)
  - no more baseline forecast data is available to the NETSO; or
  - 72 hours have elapsed since the Partial Shutdown commenced.

2) Paragraph 4.1 on page 12

The System Restoration Plan states:

'In GB, a Black Start restoration will be deemed to be completed when either:

- Normal Market operations have resumed and the Market Suspension is no longer in force (the Balancing Mechanism resumes normal operation) as determined by the BSC Panel; or
- The end of the settlement period when NGESO determines (and notifies BSCCo that the system is back in normal operation).'

We suggest that this paragraph is reworded to clarify that the second bullet applies only in black start situations where the market has not been suspended. The following is our suggested rewording:

'In GB, a Black Start restoration will be deemed to be completed according to the rules of the Grid Code and the BSC. In essence, this is as follows:

- If normal market operations have been suspended, then a Black Start restoration will be deemed to be completed when these operations (including the Balancing Mechanism) have resumed – with this point to be determined by the BSC Panel; or
- If normal market operations have not been suspended, then a Black Start restoration will be deemed to be completed when the NGESO determines that the Total System has returned to normal operation.

END.