Design of the System Restoration Plan for Northern Ireland

In accordance with the requirements of Articles 23 and 4.5 of the Commission Regulation (EU) 2017/2196
Establishing a network code on electricity emergency and restoration

27/04/2020



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Emergency and Restoration – Response Template

SONI Ltd. invites responses to this consultation by **07/08/2020**. The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following form. The form is also available in .doc format at the Electricity Emergency and Restoration publications section of our website.

Please return the completed form to gridcode@SONI.ltd.uk

Respondent:	
Company Name:	1KO//
Does this response contain confidential information? If yes, please specify.	
Name of Consultation this response is in relation to:	

No	Question	Response (Y/N)	Rationale
1	Do you agree with the approach taken in the proposal? please provide rationale		
2	Do you agree that the proposal is consistent with the principle of minimum necessary change? please provide rationale		
3	Do you have any other comments in relation to the proposal?		

1. Definitions

Relevant definitions as per Network Code on Emergency and Restoration

defence service provider	means a legal entity with a legal or
	contractual obligation to provide a service
	contributing to one or several measures of
	the system defence plan;
restoration service provider	means a legal entity with a legal or
	contractual obligation to provide a service
	contributing to one or several measures of
	the restoration plan;
high priority significant grid user	means the significant grid user for which
	special conditions apply for disconnection
	and re-energisation;
restoration plan	means all technical and organisational
	measures necessary for the restoration of
	the system back to normal state;
re-energisation	means reconnecting generation and load
	to energise the parts of the system that
	have been disconnected;
top-down re-energisation strategy	means a strategy that requires the
	assistance of other TSOs to re-energise
	parts of the system of a TSO;
bottom-up re-energisation strategy	means a strategy where part of the system
	of a TSO can be re-energised without the
	assistance from other TSOs;
resynchronisation	means synchronising and connecting
	again two separate synchronised regions
	at the resynchronisation point;
resynchronisation point	means the device used to connect two
	separate synchronised regions, usually a
	circuit breaker;

1. Background

The System Restoration Plan is a document covering the steps taken to produce a Power System Restoration Plan (PSRP) which details the actions the TSO Control Engineers must take to restore the power system following a total or partial black out. SONI has had a Restoration Plan in place for many years. In the wake of the new Network Code requirements on Emergency and Restoration (NCER), the System Restoration Plan (SRP) is being revised as per the requirements of Commission Regulation (EU) 2017/2196 published on the 24th November 2017.

Following a consultation process during November and December 2018 as well as a request for amendments, received from the Utility Regulator on various aspects of the System Restoration Plan (SRP) as set out in Article 7 of the NCER, SONI is submitting this document to the regulatory authority in order to fulfil its requirements to submit a proposal on the design of the SRP. The measures and actions outlined in this document will be enacted in the event of a partial or total black out of the Northern Ireland power system. Note that for security and confidentiality reasons the full technical details [including detailed switching plans] is not be disclosed within this document.

The relevant legislative and Grid Code articles relating to Power System Restoration are listed in the table below:

Requirement	Service	Currently Defined Within
Ancillary Service	TSO to ensure availability of ancillary services to operate the grid securely	SONI Transmission System Operator Licence - Condition 29
Black Start Definitions and	Availability of certain units to start up without external power supply	Grid Code CC.S1.1.4
Requirements	Availability of interconnectors to start up without external power supply	N/A
	Reference to Ancillary Service Agreement	SONI Transmission System Operator Licence - Condition 29
Re-energisation procedure	Power System Restoration and provision for TSO Restoration Plan	Grid Code OC7.4.6
Black Start Testing	Powers for TSO to carry out tests on Black Start Generators once per year.	Grid Code OC11.2 (f)

The areas covered in this document are:

- Design of the System Restoration Plan
- Implementation of the System Restoration Plan
- Activation of the System Restoration Plan
- · Re-energisation of the Power System
- Frequency management and re-synchronisation of the Power System
- Measures of the System Restoration Plan

The measures and remedial actions detailed in this document will be enacted depending on the status of the power system in Northern Ireland at the time of the required action. This SRP is drafted with the following technical guidelines taken into account; The operational security limits set out in accordance with Article 25 of Regulation (EU) 2017/1485¹.

- The behaviour and capability of load and generation within the synchronous area.
- The specific needs of the high priority grid users
- The characteristics of the transmission system and underlying DSO's.

¹ https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1485&from=EN

2. System Restoration Plan Overview

2.1. Design of the Restoration Plan

2.1.1. Network Code Requirements

The System Restoration Plan has been designed in accordance to the requirements of Article 23 of the Emergency and Restoration Code. This article details the specific requirements of the System Restoration Plan and what should be considered when drafting.

When designing the restoration plan it must take into account:

- The behaviour and capabilities of load and generation
- The specific needs of high priority significant grid users and their terms and conditions for disconnection and re-energisation
- The characteristics of the network and of the underlying DSOs networks

The System Restoration Plan contains the conditions under which it shall be activated and the instructions to be issued to the TSO. In particular it shall:

- Provide a list of measures to be implemented by the TSO, DSO and SGUs on their installations.
- Provide a list of substations which are essential for its restoration plan procedures.
- The implementation deadlines for each listed measure

The System Restoration Plan shall include at least the following technical and organisational measures:

- Re-energisation procedure;
- · Frequency management procedure; and
- Re-synchronisation procedure.

The restoration plan shall have minimal impact on the system users, be economically efficient and only necessary measures shall be activated.

2.1.2. Provision of the Restoration Plan

There are various statutory obligations to which a TSO must adhere to from European directives, through to the applicable codes. The hierarchy order is demonstrated in Figure 1 below.

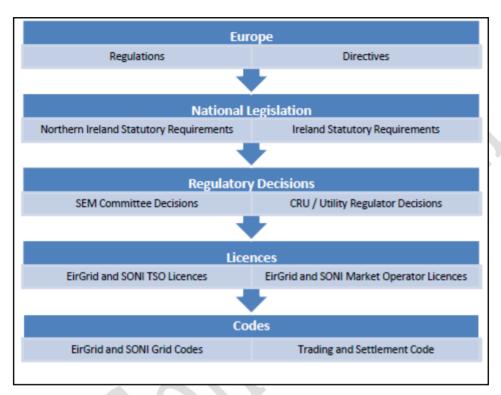


Figure 1 - Hierarchy of Regulations

The Network Code on Emergency Restoration (NCER) is one of a suite of European Network Codes and Guidelines that seek to achieve a fully functioning and interconnected energy market to ensure the security of supply and to benefit all consumers via competitive markets across the EU.

The NCER aims to establish a set of common minimum requirements and principles for the measures and procedures of TSOs, DSOs and SGUs when a power system is in Emergency, Blackout or Restoration state, however, this SRP concentrates on operating the power system when specifically in Blackout or Restoration state.

The NCER links and interacts with a number of other Network Codes, including but not limited to:

- System Operation Guideline (SOGL), EU Regulation 2017/1485
- Requirements for Generators (RfG), EU Regulation 2016/631
- High Voltage Direct Current (HVDC), EU regulation 2016/1447
- Demand Connection Code (DCC), EU Regulation 2016/1388

The SONI PSRP provides a detailed plan for the TSO to restore the power system following a total or partial black out in Northern Ireland. The design of the System Restoration Plan is set out in SONI Grid Code sections OC7.4

As per Grid Code section OC7.2 states that the objective of the PSRP is to:

- Achieve restoration of the total system and enable demand to once again be satisfied in the shortest possible time.
- To achieve re-synchronisation of parts of the transmission system which have ceased to be synchronised with each other
- To ensure communication routes and arrangements are available to senior management of the TSO
- To ensure that the NI System can continue to operate in the event that the TSO Control Centre is incapacitated for any reason

As per Grid Code sections OC7.4.1 to OC7.4.4, during these periods of total or partial shutdown, licence standards may not be met and the whole or any part of the system may be operated outside of normal voltage and/or frequency standards.

As per the PSRP in line with the System Operator Guidelines (SOGL) article 18, the system is considered to be in Blackout State if any of the following conditions has occurred:

- Loss of more than 50% of demand load
- Loss of voltage across the transmission system for 3 minutes
- The restoration plan has been activated

Grid Code section OC7.5 outlines that certain power stations ("Black Start Stations") are identified under their connection agreement as having ability for at least one of its Centrally Dispatched Generating Units (CDGU's) to Start-Up as soon as possible from Shutdown and to energise a part of the total system to be synchronised to NI System upon instruction from the TSO. Kilroot Power Station (KPS) (Units 1 & 2) has a conventional Black Start capability which means it has the ability to power its internal auxiliaries without the use of any transmission system.

Ballylumford Power Station (BPS) (Units B31 & B32) and Coolkeeragh Power Station (CPS) (Unit C30) require electricity supplies to power their stations auxiliaries. These supplies come from local power station gas turbines.

The substations that are essential for the restoration plan procedure are the substations which are involved in the Black Start Mobilisation Alert. NIEN operators will be dispatched to priority stations as per the "NIEN Black Start Mobilisation Members List" which is disclosed within the PSRP.

Grid Code section OC7.6.2 states that the recovery from a Total Shutdown or Partial Shutdown require that this OC7 is sufficiently flexible to accommodate the full range of Power Station, Total System characteristics and operational possibilities, and this precludes the setting out of precise chronological sequences.

In the PSRP it is assumed that a total generation blackout has occurred, i.e. generation stations have lost both external and internal power supply. The following assumptions have been made:

- No damage to generation plant has occurred.
- Black Start generation stations remain fully operational.
- Adequate staffing of generation stations is provided.
- No major loss of transmission facilities e.g. lines down due to storm damage.
- All switchgear can perform at least one open, close, open cycle, after loss of system supply.
- No major loss of telecommunications facilities (voice/data) has occurred.
- No major loss of CHCC computing facilities (hardware/software) has occurred.

The overall strategy will, in general, include the overlapping phases of establishment of isolated Power Stations, together with complementary local Demand, termed "Power Islands", step by step integration of these Power Islands into larger sub-systems and, eventually, complete re-establishment of the Total System.

 ²System Alert – Blue Alert SMS sent to Black Start distribution list to inform nominated parties that the NI system is in a Blue Alert State

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² Further information on System States can be found at https://www.sem-o.com/documents/general-publications/BP_SO_09.2-Declaration-of-System-Alerts.pdf

- System Black Start NIEN Mobilisation SMS sent to Transmission Asset Owners' nominated staff to instruct Transmission substation attendance within 2 minutes of Blue Alert SMS being sent
- Specific plan of action formulated by the CHCC within 30 minutes of establishment of the nature and the extent of the blackout.
- Stable operation of the Black Start Units within 1 hour of Blue Alert issuance
- External supply to primary target generators as specified in the plan within 2 hours of plan formulation
- Supply restored to all conventional generators within 4 hours of plan formulation
- Re-synchronisation of separate subsystems within 6 hours of plan formulation
- Restoration of supply to specified transmission stations within 8 hours of plan formulation
- Restoration of continuous supply to all remaining 275 kV and 110 kV transmission stations within 12 hours of plan formulation

With all our procedures in place for the design of the restoration plan we are in compliance with the NCER and we ensure continuous compliance with the grid codes and network codes.

The high level steps to be included in the development of a restoration plan are:

Step / Tasks	Available Tools & Notes		
1. Communication			
Contact Manager of Real Time	CHCC Check lists in back of the PSRP		
Issue Blue Alert SMS	SMS System procedure in		
Issue Black Start Mobilisation SMS	Appendix 17		
Update EAS			
Contact DCC	OTN / Satellite phones		
Staff the CHCC/ECC – Appoint Control Engineers to manage designated island Staff the Incident Room (If required)	Control Engineers, SCADA & Near Time Standby Engineers		
2. Establish status of Black Start and Non Black Start Power Stations			
Check EMS to confirm that CHCC Emergency Diesel Generator is online & connected.	Contact SONI SCADA immediately		
Contact Black Start Stations - establish time to Black Start			
Contact generation stations with target generators - establish status, critical time for getting supply and time to re-start once external supply is restored	Refer to reference information in each subsystem PSRP		
Prioritise generation stations for supply			
3. Divide transmission system into subsystems			
Check all Circuit Breakers are opened at all	Use PSRP as a guide & draw		

transmission substations	dividing lines on network drawing
Split the transmission system into subsystems	template in PSRP
Clearly delineate between subsystems	template in Ferti
4. Choose Path from Black Start Station to priority	Non Black Start Stations
Check Black Start Mobilisation Substation List –	
NIEN Engineers will confirm substation attendance	Substation attendance sheet and
with CHCC. Contact DCC for additional substation	BSM Procedure in Appendices
attendance where required.	
Consult PSRP for preferred route	Identify Transmission &
Review status of Transmission System	Generation outages that affect
	restoration path via EMS
Coordinate with DCC to ensure route is staffed	As per BSM procedure
Develop a detailed switching plan for each	Refer to the relevant sections of
subsystem restoration path.	the PSRP for guidance
5. Commence Sub System Restoration & Load Pic	
Use soft energisation if available	Black Start Generating Stations
Communicate with DCC when picking up auxiliary	DCC should have agreed load
load blocks in power stations	blocks prepared
DCC to switch in load to raise total load quantity and	Communicate with Generators –
stabilise generating units within islands	Ensure Automatic Frequency
	Response is enabled to provide
	system stability
When picking up DCC load ensure frequency is high	Frequency overview page on EMS
and the voltage drop that will occur on switch in does	gives frequency at Black Start
not cause very low voltages	Stations
Commence DCC load reconnection within the limits	Priority Loads for reconnection in
of the available generators – keep units part loaded	consultation with DCC
6. Synchronise Sub Systems	
Couple weak subsystems to strong subsystems	DCDD Appendix 6 Menuel
Use Synchronising Points identified in the PSRP if possible	PSRP Appendix 6 – Manual
Communicate with NIEN field Engineers at	controlled Synchronising facilities NIEN will provide confirmation that
substations with synchro scope operations.	Engineers are fully trained in
Substations with synchro scope operations.	manual sync switching
Step down Island Control Engineers as Islands are	manda synd switching
unified to form one jurisdictional island	
7. Complete Restoration	
Rebuild the system carefully	
Avoid overloads or voltage issues.	
Cancel Blue Alert Signal once restoration is	EMS Contingency Analysis
complete.	
1-0-11-1-1-1-1	

2.2. Activation and Re-energisation of the Restoration Plan

2.2.1. Network Code Requirements

The System Restoration Plan has an activation and re-energisation plan in accordance to the requirements of Article 25 and 26 of the Emergency and Restoration Code. These articles detail the specific requirements of the System Restoration Plan and what should be considered when drafting.

Each TSO shall activate the procedures of its restoration plan in coordination with the DSOs and SGUs identified pursuant to Article 23(4) and with restoration service providers in the following cases:

- When the system is in the emergency state, once the system is stabilised following activation of the measures of the system defence plan; or
- When the system is in the blackout state

During system restoration, each TSO shall identify and monitor:

- Synchronised regions to which its control area belongs and the TSO which it shares this synchronous region with
- The available active power reserves in its control area.

Each DSO and SGU identified and each restoration service provider shall execute without undue delay the restoration plan instructions issued by the TSO, in accordance with the restoration plan procedures.

Each TSO shall activate those procedures of its restoration plan that have a significant cross-border impact in coordination with the impacted TSOs.

The re-energisation procedure of the restoration plan shall contain a set of measures allowing the TSO to apply either a top-down/bottom-up re-energisation strategy depending on the circumstances.

The re-energisation procedure shall also include measures to:

- Manage voltage and frequency deviations
- Monitor and manage island operation

Resynchronising island operation areas

When re-energisation is occurring the TSO shall take into account:

- The availability of power sources capable of re-energisation
- The expected duration and risks of possible re-energisation strategies
- The conditions of the power system
- The conditions of directly connected systems, including interconnectors
- High priority significant grid users
- The possibility to combine top-down and bottom-up re-energisation strategies

During re-energisation, the TSO shall, after consultation with DSOs, establish and notify the amount of netted demand to be reconnected on distribution networks.

2.2.2. Provision of the Restoration Plan

The activation and re-energisation of the System Restoration Plan is set out in SONI Grid Code section OC7.4.6.

The restoration of a power system can be achieved via two strategies categorised by the Network Code as top-down or bottom-up. A top-down approach is when assistance is needed from another TSO, for Northern Ireland this would mean requesting a supply from Ireland via a north south tie line at Tandragee. Bottom-up involves using a diesel unit to start larger conventional machines. In the event of a blackout in Northern Ireland it is expected that a combination of top-down and bottom-up re-energisation would be used.

If the SONI system is in a blackout state and the interconnectors to the ROI system have tripped open on a low frequency trip during the black-out cascade but the ROI system remains energised, it may be possible to restore a 275 kV supply to KPS via the Tandragee – Louth 275 kV circuits.

The Moyle HVDC Interconnector supplies power to the Northern Ireland Grid System, but due to the type of technology utilised it does not provide Black Start capability. Rather it requires there to be a substantive system at the inverter end, Ballycronanmore, in order to supply synchronised real power to the Northern Ireland system. It is

calculated that this value is around 400 MW of system load before it is reconnected. It is estimated that this could be around 5 to 7 hours into the plan, and is therefore not a consideration in the early stages.

The bottom-up approach involves splitting the system into three subsystems which all have a designated black start station as mentioned in section 2.1.2. Once auxiliary supplies have been established at each power station, they should then follow their own Black Start procedure to extend their supply and re-energise a part of the transmission system adjacent to it.

The idea of restoring subsystems independently is to allow progress to develop simultaneously in different parts of the network in a controlled manner. It is also desirable to minimise the possibility of a second total system collapse by keeping the network divided into independent subsystems. However, as restoration develops in each subsystem the time will come when it is considered appropriate to synchronise these subsystems to each other. This should be done only when the subsystems have developed to a stage where they are operating in a stable way and the chance of one subsystem "bringing down" a second subsystem is considered to be minimal. Synchronising should take place only where a controlled synchronising facility exists, a list of these technical details are contained in the PSRP.

During the restoration period each of the three control desks (each one representing subsystems) will be staffed by a minimum of two control engineers until the full complement of additional staff has arrived. One of the control engineer's responsibilities will be to restore the subsystem, whilst the other control engineer will be responsible for providing backup advice and calculations, e.g. manual recordings of frequency from generators if necessary.

During the switching actions for the restoration of the subsystems the frequency and voltage are monitored continuously and carefully. Each subsystem also has at least one location where the field frequencies are being measured and telemetered back to the CHCC.

Grid Code section OC7.4.6.4 states that the TSO's instructions may be to:

• A Black Start Station relating to the commencement of generation

- To a Large Demand Customer with respect to the restoration of Demand
- To the DNO with respect to cooperating in the restoration of Demand on the Distribution System
- To a Generating Plant relating to preparation for commencement of generation once an external power supply has been made available

Grid Code section OC7.4.6.5 states that:

- The TSO instructions relating to a Black Start will be given in the same format as normal Dispatch Instructions.
- Accordingly, the TSO will, as part of a Black Start, instruct a Generator with a
 Black Start Station to Start-Up a particular CDGU and confirm to the TSO when
 this has been achieved.
- Following such confirmation, the TSO will endeavour to stabilise that CDGU by instructing Large Demand Customers to establish appropriate Demand on the Transmission System and/or the DNO to coordinate where possible the establishment of appropriate Demand on the Distribution System,
- Following which the TSO may instruct the Start-Up and Synchronisation of the remaining available Centrally Dispatched Generating Units (CDGUs) at that Black Start Station and their loading with appropriate Demand to create a Power Island.

If during this Demand restoration process any CDGU cannot, because of the Demand being experienced, either keep within its Technical Parameters or operate outside its Technical Parameters, the Generator shall inform the TSO and the TSO will, where possible, either instruct Large Demand Customers to alter Demand and/or the DNO to cooperate with altering Demand, or will re-configure the NI System in order to alleviate the problem being experienced by the Generator.

SONI will take such actions as follows:

 Ensure the NIEN Black Start Mobilisation members who are a team of on call NIEN Engineers that report to designated substations in the event of a black start to switch off all low frequency and low voltage load shedding facilities and to switch off auto-reclosing facilities on transmission lines. The list of members are detailed in appendix 16 of the PSRP

- The transmission system should be re-energised feeder by feeder to limit increments of Reactive power [MVAr] generated
- Only one circuit of a double circuit feeder should be used at the early stages of restoration and except where studies have shown that a problem does not exist, care should be taken when energising a long 275kV or 110kV transmission line, to the end of which an unloaded transformer is connected
- To minimise potential inrush currents, transformers tap changers should be positioned so that the maximum number of turns will be excited in the transformer

Loading engineers will use the latest load schedule to decide which loads should be reconnected. At early stages of restoration the stability of the Black Start units is of priority so the load that is being reconnected is selected based on the ability to reconnect very small load blocks with minimal switching. Once additional generators come onto the subsystem, priority loads can be restored.

2.3. Frequency Management and Re-synchronisation

2.3.1. Network Code Requirements

The System Restoration Plan has to manage frequency and the re-synchronisation of the grid in accordance to the requirements of Articles 28-34 of the Emergency and Restoration Code. These article details the specific requirements of the System Restoration Plan and what should be considered when drafting.

The frequency management procedure of the restoration plan shall contain a set of measures aiming at restoring system frequency back to the nominal frequency.

The TSO shall activate its frequency management procedure:

- In preparation of the re-synchronisation procedure
- In case of frequency deviation
- In case of re-energisation

It shall include:

A list of actions regarding the setting of the load-frequency controller

- The establishment of target frequency in case of bottom-up re-energisation strategy;
- Frequency management after frequency deviation; and
- Frequency management after synchronous area split.
- The determination of the amount of load and generation to be reconnected taking into account the available active power reserves within the synchronised region in order to avoid major frequency deviations.

The re-synchronisation procedure of the restoration plan shall include:

- The measures allowing the TSO to apply a re-synchronisation strategy
- The maximum limits for phase angle, frequency and voltage differences for connecting lines

2.3.2. Provision of the Restoration Plan

The frequency management and re-synchronisation of the System Restoration Plan is set out in SONI Grid Code section OC7.5

Grid Code section OC7.5.1 states that where parts of the Total System have ceased to be Synchronised with each other but there is no Total Shutdown or Partial Shutdown, the TSO will instruct relevant Users to regulate generation or Demand, as the case may be, to enable the De-Synchronised islands to be Re-Synchronised and the TSO will inform those Users when Re-Synchronisation has taken place.

Grid Code section OC7.5.2 states that during a period in which the circumstances described in OC7.5.1 apply, the Licence Standards may not be met and the whole or any part of the Total System may be operated outside normal voltage and/or Frequency standards.

Further, Scheduling and Dispatch in accordance with the principles in the SDCs for determining which CDGUs will be scheduled and dispatched may cease and will not be re-implemented until the TSO decides that normal Scheduling and Dispatch procedures can be re-implemented.

The TSO will inform all Generators with Generating Plant when normal Scheduling and Dispatch has been re-implemented.

Grid Code section OC7.5.3 states that in circumstances where the part of the NI System to which Generating Units are connected has become detached from the rest of the NI System and there is no Synchronising system available to facilitate re-synchronisation with the rest of the NI System, then the Generator shall, under the TSO's instructions, ensure that the Generating Units are disconnected and held ready for re-synchronisation upon the TSO's subsequent instructions.

In accordance with Article 6(1) of the Commission Regulation (EU) 2017/2196 SONI works closely with EirGrid, the other TSO in Ireland, who will coordinate as restoration develops on the power systems. SONI and EirGrid operate as a single synchronous area when both TSOs are operating within normal state. As restoration develops on the SONI system and it is suitable to resynchronise with EirGrid, EirGrid TSO is the predetermined frequency leader in accordance with Article 29(4) of the Commission Regulation (EU) 2017/2196. EirGrid will act as the frequency leader until such time as the synchronous area has been completely resynchronised and the system frequency is within standard frequency range (as per Article 29 6(b)). SONI TSO will support the frequency leader in accordance with Article 30(3). The target frequency for restoration (top-down and bottom-up re-energisation strategies) will be 50 Hz in the synchronous area.

SONI and EirGrid operate as a single operational area with responsibility for dispatch of generators alternating between the two TSOs on a regular basis. As frequency leader EirGrid can consider the amount of available operating reserves and interconnector capacity available for the synchronous area.

3. Article by Article Summary

The following table summarises the SRP with respect to the relevant articles of the NCER.

Article	Details	SONI Comments
1-3	General Provisions and Definitions	
4	Regulatory Aspects including general	This document and related
	principles / transparency; Terms and	documents comprise the public
	Conditions Consultation; December	consultation documents that are
	18 th Notification to RAs	being carried out to satisfy the
		provisions in Article 4 (and 7).
5	Consultation and Coordination	As per process, public consultation
6	Regional Coordination	Northern Ireland system restoration
		is aligned with Ireland system
		restoration to ensure consistency. As
		NI is not AC connected to GB, Article
		6 does not extend to consideration of
		GB SRP in any detail.
7	Public Consultation	This document and related
		documents comprise the public
		consultation documents that are
		being carried out to satisfy the
		provisions in Article 7 (and 4).
8	Recovery of Costs	SONI does not anticipate any
		additional costs stemming from this
		Regulation.
9	Confidentiality Obligations	General principles of the System
		Restoration Pan have been
		described in this document.
		Technical detail is found in the full
		plan.
11-22	System Defence Plan	Covered in SDP Document
23	Design of the SRP	The NI PSRP has been in existence

Article	Details	SONI Comments
		for many years; The principles set
		out in this Article strongly align with
		the design of the current plan. This
		revision will further align with the
		provisions of the NC ER, e.g. the
		concept of bottom-up versus top-
		down restoration.
24	Implementation of the SRP	No changes, as NI PSRP plan has
		been fully reviewed [2020 version]
25	Activation of the SRP	The NI PSRP is enacted if the
		system is in a blackout or partial
		blackout state.
26	Re-energisation Procedure	Bottom-up and top-down approaches
		detailed in the NI PSRP.
27	Activation of Re-energisation	As per detailed plan. Control
	Procedure	engineers are trained to anticipate
		many different scenarios and activate
		accordingly.
28-31	Frequency Management after	These Articles reference a European
	Frequency Deviation; Frequency	heavily meshed system of restoration
	Management after Synchronous Area	where the actions of TSO can impact
	Split	on Synchronous area. In general,
		they do not apply in general to the
		Ireland / Northern Ireland context
		where there is a single synchronous
		area.
32-34	Resynchronisation Procedure;	The general principles in these
	Resynchronisation Strategy	Articles are adhered to; but relate
		more explicitly to Europe where
		several TSO may be attempting to
		resynchronise areas, and where one
		TSO needs to be in charge.

