

Code Administrator Consultation			
<h2>GC0133:</h2> <h3>Timely informing of the GB NETS System State condition</h3> <p><b>Overview:</b> This Modification will require the Transmission System Operator (TSO) for GB; National Grid Electricity System Operator (NGESO); to inform, in a timely manner, the System State condition of the GB National Electricity Transmission System (NETS) to market participants.</p>	<h4>Modification process &amp; timetable</h4> <ol style="list-style-type: none"> <li>1 <b>Proposal Form</b> 14 October 2019</li> <li>2 <b>Code Administrator Consultation</b> 13 April 2021 - 13 May 2021</li> <li>3 <b>Draft Modification Report</b> 19 May 2021</li> <li>4 <b>Final Modification Report</b> 07 June 2021</li> <li>5 <b>Implementation</b> 10 working days following decision</li> </ol>		
<p><b>Have 5 minutes?</b> Read our <a href="#">Executive summary</a></p> <p><b>Have 20 minutes?</b> Read the full <a href="#">Code Administrator Consultation</a></p> <p><b>Have 30 minutes?</b> Read the full Code Administrator Consultation and Annexes.</p>			
<p><b>This modification is expected to have a: <span style="color: green;">Low impact:</span></b> ESO (in terms of reporting the System State condition) and for Generators, Suppliers and other market participants (in terms of receiving, considering and taking internal action(s) arising from being notified of the System State condition).</p>			
<p><b>Modification drivers:</b> Efficiency, Transparency</p>			
<p><b>Governance route</b></p>	<p>Standard governance modification which has been sent back by the Authority for refinement of the solution by a Workgroup.</p> <p>Please note: At the Grid Code Review Panel on 25 March 2021, it was agreed that this modification does not require a Workgroup Consultation or Workgroup Vote.</p>		
<p><b>Who can I talk to about the change?</b></p>	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p><b>Proposer:</b> <a href="mailto:Garth.Graham@sse.com">Garth.Graham@sse.com</a> Tel: 01738 456000</p> </td> <td style="width: 50%; vertical-align: top;"> <p><b>Code Administrator Chair:</b> <a href="mailto:Nisar.Ahmed@nationalgrideso.com">Nisar.Ahmed@nationalgrideso.com</a> Tel: 07773 043068</p> </td> </tr> </table>	<p><b>Proposer:</b> <a href="mailto:Garth.Graham@sse.com">Garth.Graham@sse.com</a> Tel: 01738 456000</p>	<p><b>Code Administrator Chair:</b> <a href="mailto:Nisar.Ahmed@nationalgrideso.com">Nisar.Ahmed@nationalgrideso.com</a> Tel: 07773 043068</p>
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<p><b>How do I respond?</b></p>	<p>Send your response proforma to <a href="mailto:grid.code@nationalgrideso.com">grid.code@nationalgrideso.com</a> by <b>5pm on 13 May 2021</b></p>		

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## Executive summary

The original GC0133 Final Modification Report received a send-back decision by the Authority on 4 September 2020 (see decision letter in Annex 3) due to there not being enough evidence to support whether the modification would impact relevant objectives (a) and (c) of the Grid Code. A Workgroup was set up as directed by the Grid Code Review Panel to address:

- The benefits of the modification to market participants and stakeholders; and
- The challenges to the ESO of providing this information, including the challenges of publishing the reasons for the changes of system state condition.

### What is the issue?

The Proposer has set out that they have identified a defect: namely that the current condition of the 'System State'; which the ESO is required<sup>1</sup>, in real time operations, to monitor and determine for the GB NETS; is not currently visible to the wider industry<sup>2</sup>, such as Generators, Suppliers and other market participants (as well as BEIS, Ofgem, DNOs, Interconnectors, etc.) in a timely, and ongoing, manner.

### What is the solution and when will it come into effect?

**Proposer's solution:** In the Proposer's view, the Grid Code will need to be amended to include a simple requirement on the ESO to update the BMRS System Warning webpage<sup>3</sup> as soon as reasonably practical, using reasonable endeavours, whenever the GB NETS 'System State' condition changes; be that a degradation or an improvement in the 'System State'.

### Workgroup conclusions:

- A Workgroup convened on 9 March 2021 to discuss the benefits of the modification to market participants and stakeholders: and
- The challenges to the ESO of providing this information, including the challenges of publishing the reasons for the changes of system state condition.

**Implementation date:** June 2021 - 10 working days following Authority decision.

### What is the impact if this change is made?

#### Proposer's View

In the Proposer's view this proposal is expected to have a low impact on the ESO (in terms of reporting the 'System State' condition) and for Generators, Suppliers and other market participants (in terms of receiving, considering and taking internal action(s) arising from being notified of the 'System State' condition).

### Interactions

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<sup>1</sup> In accordance with Article 19(1), (2) and (3) of SOGL.

<sup>2</sup> Although it is provided, by the ESO, to other TSOs, in accordance with Article 19(4), Article 42(1)(e) and Article 152(3)(a) of SOGL.

<sup>3</sup> <https://test2.bmreports.com/bmrs/?q=transmission/systemwarning>

No impact has been identified to the Balancing and Settlement Code, however, it would see the ESO using the current BMRS System Warning page to inform stakeholders of changes to the condition of the GB NETS 'System State' situation.

## What is the issue?

The Proposer has set out that they have identified a defect: namely that the current condition of the 'System State'; which the ESO is required<sup>4</sup>, in real time operations, to monitor and determine for the GB NETS; is not currently visible to the wider industry<sup>5</sup>, such as Generators, Suppliers and other market participants (as well as BEIS, Ofgem, DNOs, Interconnectors, etc.) in a timely, and ongoing, manner.

In the Proposer's view, the Grid Code will need to be amended to include a simple requirement on the ESO to update the BMRS System Warning webpage<sup>6</sup> as soon as reasonably practical, using reasonable endeavours, whenever the GB NETS 'System State' condition changes; be that a degradation or an improvement in the 'System State'.

The ESO would be required to report, via an update on the BMRS System Warning webpage, any and all changes in any 'System State' of the GB NETS irrespective of whether it is an improving or degrading situation.

The definitions of the various System States etc., would be based on those found in Article 3 of the System Operation Guideline ('SOGL') (Regulation (EU) 2017/1485<sup>7</sup>).

For the avoidance of doubt, the definitions proposed to be used do not currently appear in the 'Glossary & Definitions'<sup>8</sup> of the Grid Code (so including them as new definitions, with this proposal, should not give rise to inconsistencies etc., with the baseline).

The reasons for using these existing, well established and understood, definitions from SOGL for the purposes of this proposal is twofold:

- Firstly, they are the prevailing legal definitions (as the SOGL has already entered into effect) that the ESO uses to operate the GB NETS.
- Secondly, as such, the ESO is very familiar with these terms and already uses them; in respect of the classification of the 'System State'<sup>9</sup>; when performing its operational security requirements of monitoring and determining the 'System State'<sup>10</sup> and taking the appropriate ESO action(s)<sup>11</sup> accordingly, as part of its day to day operation of the GB NETS, that they have been trained<sup>12</sup> to undertake.

This means that the change this proposal seeks to introduce into the Grid Code; to report in a timely manner using the BMRS website (which the ESO already uses, day to day)

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<sup>4</sup> In accordance with Article 19(1), (2) and (3) of SOGL.

<sup>5</sup> Although it is provided, by the ESO, to other TSOs, in accordance with Article 19(4), Article 42(1)(e) and Article 152(3)(a) of SOGL.

<sup>6</sup> <https://test2.bmreports.com/bmrs/?q=transmission/systemwarning>

<sup>7</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1485&from=EN>

<sup>8</sup> <https://www.nationalgrideso.com/document/33836/download>

<sup>9</sup> In accordance with Article 18 of SOGL.

<sup>10</sup> In accordance with Article 19 of SOGL.

<sup>11</sup> See, for example, Articles 20, 21, 22, 23, 27, 32, 35, 42, 56, 102, 103, 131, and 152 of SOGL.

<sup>12</sup> See, for example, Articles 58 and 63 of SOGL.

any changes to the GB NETS operational 'System State' situation; will be a very simple one for the ESO to undertake as the ESO already currently performs these two constituent elements (all be it separately at present).

## **Why change?**

In the Proposer's view there are three reasons for this change:

- This change should be made to enable Generators, Suppliers and other market participants (as well as BEIS, Ofgem, DNOs, and Interconnectors etc.) to be constantly aware of the condition of the GB NETS 'System State' at any moment in time so that they can perform their work in a way that is conducive to supporting the ESO's operation of the GB NETS.
- It will, by improving wider industry communications, result in the better operation of the GB NETS.
- This proposal also seeks to *ensure and enhance the transparency and reliability of information on transmission system operation* (as required by Article 4(1)(g) and 4(2)(b) of SOGL).

On their own each of these reasons would justify why this change should be made – combined they make a compelling case why this simple and straightforward change should be made.

## **What is the solution?**

### **Proposer's solution**

The Grid Code will need to be amended to include a requirement on the ESO to update the BMRS System Warning webpage as soon as reasonably practical, using reasonable endeavours, whenever the GB NETS 'System State' condition changes.

That change in the 'System State' condition would be in the form of either:

- (i) a degradation (such as might arise from a disturbance, going from 'Normal State' to 'Alert State' etc., or going from 'Alert State' to 'Emergency State' etc.,) in the 'System State'; or
- (ii) an improvement (going from 'Emergency State' to 'Alert State' or 'Alert State' to 'Normal State' etc.,) in the 'System State'.

For the avoidance of doubt, it is possible for a change in the 'System State' condition to occur such that it degrades (or improves) by 'jumping' one or more states; for example, straight from 'Normal State' to 'Emergency State' (thus 'skipping' the 'Alert State') or vice versa. Equally its possible for a state to improve; such as from 'Blackout State' to 'Restoration State'; but then quickly degrade back, in this example, to 'Blackout State' from 'Restoration State'.

The ESO would be required to report, via an update on the BMRS System Warning webpage, any and all changes in the 'System State' of the GB NETS irrespective of whether it is an improving or degrading situation such that the current condition of the 'System State' is known to relevant parties in a timely manner.

The BMRS reporting by the ESO would take the form either of:

- “There has been a degradation in the 'System State' from [X] State to [Y] State”; or
- “There has been an improvement in the 'System State' from [Y] State to [X] State”.

The ESO would be free, but not obliged, to add any additional commentary, about the change in the 'System State' condition, that they wished within their BMRS messaging. The ongoing classification of the 'System State' condition, by the ESO, for the purposes of reporting to GB stakeholders shall be in accordance with Article 18 of SOGL and this shall be monitored and determined, by the ESO, in accordance with Article 19 of SOGL.

The Proposer recommended that the definitions of various system states, based on those found in Article 3 of SOGL, were used in the Grid Code. Since meeting with the ESO representative to discuss the Legal text, the following amendments were made due to the following rationale: -

“(1) **'operational security'** means the transmission system's capability to retain a normal state or to return to a normal state as soon as possible, and which is characterised by operational security limits;”

“(5) **'normal state'** means a situation in which the system is within operational security limits in the N-situation and after the occurrence of any contingency from the contingency list, taking into account the effect of the available remedial actions;”

“(17) **'alert state'** means the system state in which the system is within operational security limits, but a contingency from the contingency list has been detected and in case of its occurrence the available remedial actions are not sufficient to keep the normal state;”

“(22) **'blackout state'** means the system state in which the operation of part or all of the transmission system is terminated;”

“(31) **'disturbance'** means an unplanned event that may cause the transmission system to divert from the normal state;”

“(36) **'system state'** means the operational state of the transmission system in relation to the operational security limits which can be normal state, alert state, emergency state, blackout state and restoration state;”

“(37) **'emergency state'** means the system state in which one or more operational security limits are violated;”

“(38) **'restoration state'** means the system state in which the objective of all activities in the transmission system is to re-establish the system operation and maintain operational security after the blackout state or the emergency state;”

“(46) **'local state'** means the qualification of an alert, emergency or blackout state when there is no risk of extension of the consequences outside of the control area including interconnectors connected to this control area;”

“(51) **'operational security indicators'** means indicators used by TSOs to monitor the operational security in terms of system states as well as faults and disturbances influencing operational security;” and

“(62) **'wide area state'** means the qualification of an alert state, emergency state or blackout state when there is a risk of propagation to the interconnected transmission systems.”

For the avoidance of doubt, the definitions listed above do not currently appear in the 'Glossary & Definitions'<sup>13</sup> of the Grid Code (so including them as new definitions, with this proposal, should not give rise to inconsistencies etc., with the baseline).

That these various 'System States' are important, in terms of the operation of the GB NETS, is clear from both their pre-eminence and repeated use, as well as the associated

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<sup>13</sup> <https://www.nationalgrideso.com/document/33836/download>



obligations, detailed elsewhere in SOGL, on the ESO<sup>14</sup> (and other parties) together with what is set out in the Emergency & Restoration Network Code<sup>15</sup> which states that:

*“Commission Regulation (EU) 2017/1485 [SOGL] sets out harmonised rules on system operation for transmission system operators (‘TSOs’), regional security coordinators (‘RSCs’), distribution system operators (‘DSOs’) and significant grid users (‘SGUs’). It identifies different critical system states (normal state, alert state, emergency state, blackout state and restoration).<sup>16</sup>”* [emphasis added]

If the ‘System State’ condition were not considered to be critical to the safe and secure operation of the system in both ordinary, day to day, situations or in exceptional circumstances then there would be (i) no need to explicitly set this out in a law, or (ii) define, and use, those terms repeatedly in the SOGL (and Emergency & Restoration Network Code) when the ESO performs the operational security requirements<sup>17</sup> needed to ensure the operational security<sup>18</sup> of the GB NETS.

### **Revisions to Proposer’s Original Solution**

The Proposer and the ESO representative met to discuss the Proposer’s Original solution (as set out above). While not implying that the ESO agreed with the modification or its solution as presented by the Proposer, legal text was developed embodying the principles of the proposal.

## **Workgroup considerations**

### **The benefits of the modification to market participants and stakeholders**

The Proposer advised the workgroup that:

- That the beneficial impact of this change in terms of transparency of information on the operation of the transmission system (including, in this case, the System State) leads to deeper understanding and greater clarity of the operation of the transmission system, leading to better decision making, leading to a more efficient electricity market, leading to enhanced competition within the electricity market, leading to lower costs to consumers. The Proposer referred to many examples available in the current ESO Forward Plan which was published in 2020 and can be found [here](#).
- The Proposer went on to say the publication of the System State, will provide stakeholders with a deeper understanding and hence greater clarity about the drivers of the ESO’s operational decision making.
- Also, the benefit of GC0133, for the ESO directly, concerns avoiding the serious risk of materially breaching “insider trading” and market abuse legal requirements that are placed on those market participants, i.e. ESO, who have access to “inside information”, such as the system state.
- Finally, the Proposer said that it should also be noted that Recital (19) of Regulation 714/20092 set out that: “Equal access to information on the physical status and efficiency of the system is necessary to enable all market participants to assess the overall demand and supply situation and identify the reasons for

<sup>14</sup> See, for example, Articles 20, 21, 22, 23, 27, 32, 35, 42, 56, 102, 103, 131, and 152 of SOGL.

<sup>15</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R2196&from=EN>

<sup>16</sup> Recital (3), ERNC.

<sup>17</sup> See, for example, Part II, Title 1 of SOGL.

<sup>18</sup> See, for example, Part II of SOGL.

movements in the wholesale price. This includes more precise information on electricity generation, supply and demand including forecasts, network and interconnection capacity, flows and maintenance, balancing and reserve capacity”.

The Proposer expressed to the workgroup that although a cost-benefit analysis is not required, it must be noted, the cost of implementing this change is relatively small - less than £10,000 as existing systems are being used. Publishing this data would allow stakeholders to make more informed decisions leading to better functioning markets leading to lower bills for the consumer.

The Proposer stated transparency was essential to achieve well-functioning, efficient, liquid and competitive wholesale markets. The Proposer further stated that transparency was the foundation for creating a level playing field thus increasing competition between different market players.

This was followed by a discussion on whether the ‘alert state’ should be included in the Legal text for the modification. The ESO representative advised the workgroup that the key concerns expressed at the Grid Code Panel were that several Panel members were uneasy about the ‘alert’ status. The system states were a requirement of the European System Operation Guideline and as drafted were intended to convey information between TSOs. In GB the ‘alert’ status had been experienced since implementation to only happen when there was loss of availability of one of the interconnectors and therefore the ESO needed to share that with neighbouring Transmission System Operators (TSOs). Some of the Grid Code Panel were uncomfortable about this, because they felt that making this information public could require sharing of commercially sensitive information. The Proposer agreed to consider some wording in the legal text, allowing the ESO flexibility to put in information if so required, address commercial confidentiality whilst limiting it to information that was not ‘inside information’, which should be in the public domain. When the legal text was being developed it was agreed that instead of it being called an “alert” it would be called “awareness” when it was published on the BMRS to try to manage any media messaging.

### **The challenges to the ESO of providing this information, including the challenges of publishing the reasons for the changes of system state condition.**

In the view of the ESO given that the ESO only has to use "reasonable endeavours" it's difficult to see this information, on the system state, providing any real time use. Given this the ESO will need to put context to the change of state it may, inadvertently, make commercially sensitive information publicly available.

In the view of the ESO the ‘Alert’ status was designed by ENTSO-E to allow sharing of operational information between neighbouring TSOs.

The list of contingencies that cause the ‘alert’ state to be activated include certain interconnector issues and situations in which, for a specific further fault, operational limits will be exceeded. The ESO has reservations about whether this information would be useful to stakeholders or whether sharing specific details of a next fault that could severely impact system security would be wise.

If codified then the ESO would have no future choice over the sharing of system state information regardless of any ongoing consequences of misreporting. This proposal is



one of a number (GC0105, GC0107/113, GC0109) that seek to place reporting obligations on the ESO through the Grid Code. In the view of the ESO this changes the purpose of the Grid Code and places obligations on the ESO that could perhaps be made elsewhere within the regulatory framework.

However, the Proposer noted that the GC0133 legal text was deliberately written to ensure that there was no obligation on the ESO to provide any 'commentary' on why a system state change had occurred – therefore the ESO, in exercising 'good industry practice' would not be expected to be prone to misreporting. In simple terms, the GC0133 solution was just to report the system state change itself; and not the initial, or subsequent (after some investigation?) reasoning/understanding by the ESO for the change (in the system state).

## **Legal text**

The Proposer recommended that the definitions of various system states, based on those found in Article 3 of SOGL, were used in the Grid Code. Since meeting with the ESO representative to discuss the Legal text, the following amendments to the Legal text are required.

### **Extract from Glossary and Definitions section:**

<b>GB NETS System State</b>	<p>The state of the <b>GB NETS</b> as classified according to Article 18 of <b>European Regulation (EU) 2017/1485</b> “System Operation Guideline”, as monitored and determined in real-time by <b>The Company</b> according to Article 19 of <b>European Regulation (EU) 2017/1485</b> and which includes the following system states as defined in <b>European Regulation (EU) 2017/1485</b>:</p> <p>‘normal state’ means a situation in which the system is within operational security limits currently and will remain so after the occurrence of any contingency from the contingency list as created by <b>The Company</b> in accordance with <b>European Regulation (EU) 2017/1485</b>, and taking into account the effect of any available remedial actions;</p> <p>‘alert state’ (which shall, when reported on BMRS according to OC4.4.3, be recorded as ‘Awareness State’) means the system state in which the system is within operational security limits currently, but a contingency from the contingency list has been detected and in case of its occurrence the available remedial actions are not sufficient to maintain the normal state;</p> <p>‘emergency state’ means the system state in which one or more operational security limits are violated;</p> <p>‘blackout state’ means the system state in which the operation of part or all of the transmission system is terminated; and</p> <p>‘restoration state’ means the system state in which the objective of all activities in the transmission system is to re-establish system operation and maintain operational security after a blackout or emergency state.</p>
<b>European Regulation (EU) 2017/1485</b>	Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation.

**New Operating Code:****OPERATING CODE NO. 4  
(OC4)****REAL TIME REPORTING OF GB NETS SYSTEM STATE****CONTENTS**

(This contents page does not form part of the Grid Code)

**OC4.1 INTRODUCTION**

Operating Code No.4 ("OC4") is concerned with the real time public reporting, by **The Company**, of the **GB NETS System State**.

The system state is defined within **European Regulation (EU) 2017/1485** “System Operation Guideline”. It is monitored and determined by **The Company** in accordance with this.

#### OC4.2 OBJECTIVES

The objective of OC4 is to require the real time public reporting of the **GB NETS System State** by **The Company**.

#### OC4.3 SCOPE

OC4 applies to **The Company**.

#### OC4.4 REPORTING OF THE GB NETS SYSTEM STATE

OC4.4.1 **The Company** shall ensure that any and all changes to the GB NETS System State are reported publicly as soon as is reasonably practicable following a change in its status.

OC4.4.2 The format of such a message will include, but is not limited to, the current and previous status of the **GB NETS System State** and the time at which the change in the status took place.

OC4.4.3 The reporting of the **GB NETS System State** will be carried out by means of messages inputted by **The Company** to the system warnings webpage of the **Balancing Mechanism Reporting Service (BMRS)**.

### What is the impact of this change?

Proposer's assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Positive
(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);	Neutral
(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;	Positive
(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	Positive

(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Neutral
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In the Proposer's view this proposal is expected to have a low impact on the ESO (in terms of reporting the 'System State' condition) and for Generators, Suppliers and other market participants (in terms of receiving, considering and taking internal action(s) arising from being notified of the 'System State' condition).

In terms of the ESO this is because they already:

- (i) classify, monitor and determine the 'System State' on a real time basis, as part of their operation of the GB NETS; and
- (ii) provide information about the GB NETS, such as System Warnings, using the existing BMRS website tool.

As a result, in respect of this proposal, there is no new task for the ESO to perform in terms of (i). However, there is only a new task, in terms of (ii), for them to perform with this proposal, which is to simply update the BMRS System Warning webpage with any and all changes (degradations or improvements) to the 'System State'.

This proposal therefore has a Low Impact on the ESO and should not, for example, require new IT system solutions to be procured / tested/ installed. In terms of Generators, Suppliers and other market participants (as well as BEIS, Ofgem, DNOs and Interconnectors etc.) they will need to be cognisant of the possibility of amending their internal procedures in terms of considering the information they receive, via the BMRS, on the 'System State' condition and take whatever appropriate action they deem fit to act on that information in a manner conducive to supporting the ESO's operation of the GB NETS.

As these parties already have access to and use the BMRS website, including the System Warning webpage, for this general purpose, this proposal therefore has a Low Impact on Generators, Suppliers and other market participants (as well as BEIS, Ofgem, DNOs and Interconnectors etc.) and should not, for example, require new IT system solutions to be procured / tested/ installed.

### **ESO's View**

This assessment of the impact of the modification is not shared by the ESO. The very high-level information already shared in the ENTSO-E Awareness System in fulfilment of the requirements of the System Operation Guideline is insufficient to remove the risk of misinterpretation of the information. Also, in terms of the impact on other market participants, whilst the ESO agrees that this is low it also highlights that it is unclear what the purpose of sharing this information is, or what positive actions may be taken by market participants as a result.

### **Consumer Impacts**

#### **Proposer's View**

In the view of the Proposer, this proposal will not have any detrimental impact on consumers and by improving the communication processes and procedures for the wider

industry regarding the ongoing operation of the GB NETS this proposal will lead to a more secure system which, in turn, will benefit consumers directly.

### ESO's View

In the view of the ESO, to share, fully explain and deal with any resulting dialogue about the system state will be a significant and ongoing task which has little clear benefit. It therefore represents an additional cost that ultimately will be borne by consumers.

## When will this change take place?

### Implementation date

This Modification should be implemented 10 working days following a decision from the Authority.

### Date decision required by

The decision is required by the end of July 2021.

### Implementation approach

No system changes are required for this modification. The modification requires the ESO to publish information onto a webpage.

## Interactions

- |  |  |   |                                |
|--|--|---|--------------------------------|
| <input type="checkbox"/> CUSC                      | <input checked="" type="checkbox"/> BSC                        | <input type="checkbox"/> STC                    | <input type="checkbox"/> SQSS  |
| <input type="checkbox"/> European<br>Network Codes | <input type="checkbox"/> EBGL Article 18<br>T&Cs <sup>19</sup> | <input type="checkbox"/> Other<br>modifications | <input type="checkbox"/> Other |

The BSC deals with the BMRS. We do not think that this proposal will directly impact on the BSC itself. However, it would see the ESO using the current BMRS System Warning page to inform stakeholders of changes to the condition of the GB NETS 'System State' situation.

## How to respond

### Code Administrator consultation questions

- Do you believe that GC0133 Original proposal better facilitates the Applicable Objectives?
- Do you support the proposed implementation approach?
- Do you have any other comments?

Views are invited on the proposals outlined in this consultation, which should be received by 5pm on **13 May 2021**. Please send your response to [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com) using the response pro-forma which can be found on the [modification page](#).

*If you wish to submit a confidential response, mark the relevant box on your consultation proforma. Confidential responses 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.*

<sup>19</sup> If the modification has an impact on Article 18 T&Cs, it will need to follow the process set out in Article 18 of the European Electricity Balancing Guideline (EBGL – EU Regulation 2017/2195) – the main aspect of this is that the modification will need to be consulted on for 1 month in the Code Administrator Consultation phase. N.B. This will also satisfy the requirements of the NCER process.

## Acronyms, key terms and reference material

Acronym / key term	Meaning
BEIS	Business, Energy & Industrial Strategy
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
DNO	Distribution Network Operator
EBGL	Electricity Balancing Guideline
ENTSO-E	European Network of Transmission System Operators for Electricity
ESO	Electricity System Operator
NETS	National Electricity Transmission System
NGESO	National Grid Electricity System Operator
RSC	Regional Security Co-ordinators
SGU	Significant Grid User
SOGL	System Operator Guideline
SSE	Scottish and Southern Energy
T&Cs	Terms and Conditions
TSO	Transmission System Operator

### Reference material

- [“System Operation Guideline” \(‘SOGL’\) \(Regulation \(EU\) 2017/1485<sup>20</sup>\) dated 2<sup>nd</sup> August 2017](#)

## Annexes

Annex	Information
Annex 1	Proposal form
Annex 2	Terms of reference
Annex 3	Ofgem send-back decision letter

<sup>20</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1485&from=EN>