

Modification proposal:	Grid Code (GC) GC0154: Incorporation of interconnector ramping requirements into the Grid Code as per SOGL Article 119 (GC0154)		
Decision:	The Authority ¹ directs ² that the proposed WAGCM1 modification to the Grid Code ³ be made		
Target audience:	National Grid Electricity System Operator (NGESO or ESO), the Grid Code Review Panel, Grid Code users and other interested parties		
Date of publication:	15 March 2024	Implementation date:	29 March 2024

Background

Commission Regulation (EU) 2017/1485⁴ (now forming part of assimilated EU law), otherwise known as the System Operator Guidelines (SOGL), places certain requirements on National Grid Electricity System Operator (NGESO).

On 14 May 2019, NGESO submitted to Ofgem a mapping of the SOGL obligations already covered by the existing Grid Code and the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) provisions. In respect of obligations arising from SOGL, which did not already form part of the regulatory framework, NGESO committed to submitting an intermediate methodology demonstrating compliance. This intermediate methodology was submitted to Ofgem on 6 June 2019 and approved by the Authority on 6 August 2019 (the '2019 Decision Letter').⁵

As part of the decision to approve the intermediate methodology for SOGL compliance, within the 2019 Decision Letter Ofgem set out an expectation that NGESO work

¹ References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

³ <https://www.nationalgrideso.com/industry-information/codes/grid-code-gc>

⁴ Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation. The SOGL Regulation came into force on 14 September 2017 and now forms part of assimilated EU law.

⁵ https://www.ofgem.gov.uk/sites/default/files/docs/2019/08/article_118_and_119_final_decision.pdf

expeditiously to incorporate the relevant provisions of the intermediate methodology into the appropriate sections of the Grid Code and NETS SQSS to provide stakeholders with clarity over their obligations.

One area contained in the intermediate methodology which was not codified at that time was in relation to ramping restrictions on HVDC interconnectors under Article 119 of the SOGL. Ramping restrictions place limitations on how quickly interconnectors can adjust their energy flows. These ramping arrangements, which NGESO's intermediate methodology recognise, were and continue to be contained within agreements between NGESO and other relevant TSOs. Our understanding is that none of the existing agreements between NGESO and other relevant TSOs include a ramping rate limit exceeding 100MW/min, based on well-established operational practices.

In our 2019 Decision Letter we set out that we did not conduct an Impact Assessment with Article 119 and the ramping rates (amongst other matters), on the basis that the provisions contained in the existing framework and the intermediate methodology, did not constitute a change to existing GB requirements and arrangements. Our expectation was for NGESO to bring forward proposals to codify arrangements that are consistent with its existing business practices and do not lead to any significant change.

The modification proposal

Following the expectation set in our 2019 Decision Letter, NGESO (the 'Proposer') raised GC0154: *Incorporation of interconnector ramping requirements into the Grid Code as per SOGL Article 119* (the 'Original Proposal') on 16 December 2021.⁶ A Workgroup, comprised of a group of Transmission System Operators (TSOs) was established, convening a total of 17 times throughout the modification development process. Engagement was also conducted with EU TSOs.

The Original Proposal suggested codifying the ramping arrangements on HVDC interconnectors into the Grid Code with an amended maximum operational ramping limit of 50MW/min, unless otherwise agreed with NGESO, representing a departure from existing arrangements (which recognise ramping limits up to 100MW/min). The proposal, supported through a cost benefit analysis, reviewed various options, and led to the Proposer arguing that a 50MW/min ramping limit was the optimal solution for consumer savings and enhanced security of supply.

⁶ <https://www.nationalgrideso.com/industry-information/codes/gc/modifications/gc0154-incorporation-interconnector-ramping-requirements-grid-code-soql-article-119>

On 11 July 2023, the Workgroup agreed an Alternative Proposal, WAGCM1: codifying the ramping arrangements on HVDC interconnectors into the Grid Code at a maximum operational limit of 100MW/min, unless otherwise agreed with NGENSO. This would align the Grid Code with the maximum ramping rate limit found in existing agreements.

On 3 January 2024, the Final Modification Report (FMR) was submitted to Ofgem.

The Original Proposal

The Original Proposal intends to codify the ramping restrictions, proposing a maximum operational ramping limit of 50MW/min, unless otherwise agreed with NGENSO. The proposed operational maximum of 50MW/min would be a departure from the existing established operational limits and would result in a reduced maximum ramp rate.⁷ The FMR states that this reduced ramping rate limit would, if approved, be applicable to all existing interconnectors in service, those currently in construction/scoping, and future connected interconnectors.

The Original Proposal was derived from a Cost Benefit Analysis (CBA) commissioned by the Proposer, following an evaluation of the benefits of various potential ramping rate limits. The CBA modelled that reducing the ramping limit to 50MW/min could result in a total reduction of £865m in balancing costs between 2023-2030, benefitting the GB consumer.

The Proposer argues that implementation of the Original Proposal would strengthen security of supply due to reductions in the scale of interconnector flow changes and enable the Electricity National Control Centre to better focus on economic despatch and daily system management. The Proposer considers the Original Proposal to have a positive effect on all five Grid Code Objectives.

The Workgroup was highly critical of the CBA commissioned by NGENSO, with 7 of 8 respondents considering it to be unreliable and incomplete due to a lack of consideration for potential broader impacts, such as undermining cross-border working relations. Some Workgroup members also considered they were unable to replicate the CBA's forecasted cost reductions, highlighting concerns regarding data transparency.

A majority of the Workgroup argued that the Original Proposal risked undermining system flexibility, undermining security of supply, and increasing interconnector imbalance costs.

⁷ This Grid Code Modification proposal is only relevant to the GB grid.

They also considered the Original Proposal would risk damaging market confidence in the regulatory framework, and lead to EU TSOs imposing similar changes, creating cross-border operability misalignment.

Similar concerns were raised by EU TSOs when responding to the Code Administrator Consultation with respondents stating that the Original Proposal did not adequately consider these broader risks. Consultation responses also argued that NGESO would not require a ramping rate limit of 50MW/min in an overwhelming majority of circumstances, and that the Original Proposal met none of the five Grid Code Objectives.

The Workgroup further commissioned an evaluative report of the CBA. This report concluded that: the CBA did not consider any negative impacts from a reduction in the ramping rate; raised concerns regarding the amount of savings which would flow from reducing balancing costs; and argued that the greatest benefit of such a reduction appears to occur in the earlier years of the 2023-2030 market forecast, with lesser overall value in the second half of this period. In response, the Proposer countered that while the evaluative report cast doubt on the findings of the CBA, the report still demonstrated that implementation of the Original Proposal would reduce balancing costs, even if to a smaller degree than initially predicted by the CBA. Additionally, NGESO were of the view that the CBA did demonstrate a consideration of negative impacts of reducing the ramping rate.

WAGCM1

On the basis that the Workgroup disagreed with the Original Proposal due to concerns of damaging security of supply and limiting system flexibility, compounded with doubts surrounding the CBA supporting it and a lack of sufficient analysis on the Original Proposal's broader impact, the Workgroup raised an Alternative Modification Proposal (WAGCM1) in July 2023. WAGCM1 proposes to codify a maximum operational ramping limit of 100MW/min ramping limit on HVDC, unless otherwise agreed with NGESO, reflecting the maximum ramping limit found in existing agreements. In proposing WAGCM1, the Workgroup considered that it avoided the risk of potential negative impacts that would be seen in the eventuality of a reduced ramping rate, as proposed in the Original Proposal.

NGESO is of the view that implementation of WAGCM1 would not provide the savings from reduced balancing costs that implementation of the Original Proposal would deliver.

A majority of the Workgroup believed that WAGCM1 was better suited to facilitate one or more of the Grid Code Objectives, whereas only one supported the Original Proposal, in comparison. The majority of these respondents believed that WAGCM1 succeeded in meeting Ofgem's expectation to codify the current ramping arrangements into the Grid Code, while providing transparency and clarity for stakeholders and future interconnectors.

Among the 11 respondents of the Code Administrator Consultation, seven preferred WAGCM1.

Grid Code Review Panel Recommendation

The Grid Code Review Panel carried out their recommendation vote on 14 December 2023. The Panel was split as to whether the Original Proposal better facilitated the Grid Code Objectives with four members considering that it did not, three considering that it did and one member abstaining from voting. With regards to WAGCM1, the Panel, by majority (5 out of 8 members) considered that it did better facilitate achievement of the Grid Code Objectives, whilst two members considered that it did not and one panel member abstained.

Overall, a majority of the Grid Code Review Panel (5 out of 8), considered that WAGCM1 was the best option in comparison to the Original Proposal and the baseline. Of the remaining panel members, one considered the Original Proposal to be best, whilst another voted in favour of the baseline and the abstaining panel member did not vote. The Grid Code Review Panel therefore recommended by majority that WAGCM1 is implemented.

Our Decision

We have considered the issues raised by the modification proposal and in the FMR dated 3 January 2024, and also considered responses to the consultations. We have also noted the votes of the Workgroup and the Panel which are included in the FMR and its annexes.

We have concluded that:

- Implementation of WAGCM1 will better facilitate the achievement of the Grid Code Objectives; and
- Approving WAGCM1 is consistent with our principal objective and statutory duties.⁸

⁸ The Authority's statutory duties in this context are detailed mainly in the Electricity Act 1989 (in particular, but not limited to section 3A) as amended.

Reasons for our decision

We agree with the Grid Code Review Panel recommendation to implement WAGCM1.

We do not consider the Original Proposal to represent an improvement on current arrangements. Whilst the FMR contends that the reduced ramping rate would be applicable to all existing interconnectors in service (as well as those currently in construction/scoping, and future connected interconnectors), we do not consider the FMR is clear as to how this reduced ramping rate would apply in circumstances where NGESO has existing arrangements which recognise a higher maximum figure, for example, whether NGESO would effectively be acting in contravention of those agreements or whether renegotiated terms would be sought.

We therefore have concerns that a reduction to the maximum operational limit to 50MW/min would present a conflict with established arrangements, which could have wider impacts, such as placing NGESO in breach of those agreements or necessitating a renegotiation of their terms.

To the extent codification of a 50MW/min ramping limit did result in a change to NGESO's practice, we consider this would likely have a high impact on ramping flexibility (and, subsequently, energy security and security of supply). Additionally, the CBA, intended to support the Original Proposal, did not adequately demonstrate the purported savings of £865m in balancing cost reductions between 2023-2030, nor consider potential negative impacts in sufficient detail.

In comparison, we consider that WAGCM1 will provide clarity and transparency in the Grid Code⁹ by codifying present maximum operational ramping arrangements consistent with existing arrangements. We expect this will maintain current system flexibility, energy security and security of supply, while providing NGESO with the opportunity to agree different ramping rates where appropriate. As the codification of a 100MW/min maximum operational limit would reflect the current operational arrangements, we understand that this will have no impact on pre-existing agreements between NGESO and other relevant TSOs. As a result, approval of WAGCM1 will minimise wider risks, such as the potential need to renegotiate existing agreements between NGESO and other relevant TSOs.

⁹ <https://www.nationalgrideso.com/industry-information/codes/grid-code-gc>

We consider that WAGCM1 will better facilitate Grid Code Objectives A and E, while having a neutral impact on Grid Code Objectives B, C and D. Whilst the Original Proposal would better facilitate Grid Code Objective E, it would have a negative impact on Grid Code Objectives A and C and a neutral impact on Grid Code Objectives B and D. Overall, we consider WAGCM1 best facilitates achievement of the Grid Code Objectives with details to this effect set out below.

A) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity.

A majority of the Grid Code Review Panel voting parties considered WAGCM1 to facilitate Grid Code Objective A. One panel member considered WAGCM1 to provide the greatest flexibility of the proposals, while another considered that it facilitated enhanced transparency. Of the 11 respondents to the Code Administrator Consultation, seven considered WAGCM1 to better facilitate Grid Code Objective A, with several stating they believed WAGCM1 best benefitted system flexibility. Three of 11 respondents to the Code Administrator Consultation, including Citizens Advice, considered the Original Proposal to better facilitate all five Grid Code Objectives – including Objective A. In their Grid Code Consultation Response, the collective EU TSOs voted that neither proposal facilitated Grid Code Objective A, specifically highlighting concerns that implementation of the Original Proposal would reduce flexibility and would not facilitate market efficiency.

Whilst a majority of Panel members did not consider the Original Proposal to better facilitate Grid Code Objective A, two members did vote in support of Grid Code Objective A. One, whilst supportive of the Original Proposal, indicated an overall preference for WAGCM1. The other argued in favour of the Original Proposal, citing that any negative impact on system flexibility would be unlikely in the event of the Original Proposal's implementation. Furthermore, they argued that the Original Proposal would promote greater system efficiency, and that the updated ramping rates reflect the capabilities of current market participants. This same panel member was not supportive of WAGCM1 on the basis that it did not sufficiently take account of operational issues, related to interconnector ramping arrangements, faced by NGENSO. Consequently, they raised concerns about impacts to security of supply and balancing costs for GB consumers. This panel member additionally argued that implementation of the Original Proposal would lead to greater savings for the GB consumer, as modelled by the CBA.

Our Position

We consider that WAGCM1 will have a positive effect on Grid Code Objective A. The ramping rate of 100MW/min proposed by WAGCM1 maintains system flexibility, as it maintains the current maximum operational ramping limit of 100MW/min as contained in existing agreements. This allows for greater operational capacity, enabling efficiency in responding to market conditions and system demand. Additionally, codifying the operational ramping rate limit of 100MW/min enables continued coordination with connected cross-border partners, without risk of causing misalignment with existing agreements between NGESO and other relevant TSOs, while providing market participants access to the Grid Codes with increased transparency.

We consider that the Original Proposal would have a negative impact on Grid Code Objective A. While codifying a ramping rate into the Grid Codes does provide market participants with greater transparency, to the extent the proposal resulted in changes to NGESO's operational behaviour (and that of interconnectors), the 50MW/min limit risks restricting system flexibility by requiring interconnectors to change their energy flows in slower time. This, in turn, could reduce efficiency in responding to market conditions and system demand. The imposition of a 50MW/min limit would cause misalignment with connected cross-border partners, subsequently risking damage to cross-border coordination. Finally, as demonstrated below in the 'Issues with the CBA of the Original Proposal' section, we have doubts around any cost-saving figures set out within the CBA for the Original Proposal and the consideration against wider impacts.

As such, we believe that WAGCM1 best facilitates Grid Code Objective A.

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)

Three of the eight members of the Grid Code Review Panel considered WAGCM1 to facilitate Grid Code Objective B, with the remaining voting members considering it to be neutral. Of the 11 respondents to the Code Administrator Consultation,

seven considered WAGCM1 to better facilitate Grid Code Objective B. In respect of the Original Proposal, three panel members considered that it would have a negative impact on Grid Code Objective B, whilst two thought this objective was better facilitated and the remaining members considered there to be a neutral impact. Panel members did not give specific reasons for their views. In their Grid Code Consultation Response, the collective EU TSOs voted that only WAGCM1 facilitated Grid Code Objective B.

Our Position

We consider that both WAGCM1 and the Original Proposal will have a neutral effect on the facilitation of Grid Code Objective B. We do not expect the codification of either a 100MW/min or 50MW/min limit to have any substantial impact on facilitating effective competition in the generation and supply of electricity, either positive or negative. The modification concerns on cross-border flows would therefore not be expected to have any direct impact on competition between generators or suppliers.

As such, we expect both WAGCM1 and the Original Proposal will have a neutral impact on the facilitation of Grid Code Objective B.

C) 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;

A majority of the Grid Code Review Panel considered WAGCM1 to facilitate Grid Code Objective C. One member of the Grid Code Review Panel voting party considered WAGCM1 to be best suited to secure the operation of the transmission system. Of the 11 respondents to the Code Administrator Consultation, five considered WAGCM1 to better facilitate Grid Code Objective C. In respect of the Original Proposal, a majority of the panel considered Grid Code Objective C was not better facilitated, whilst three members considered that it was. One Panel member supporting the Original Proposal argued that it better addressed the impact of ramping on security of supply. Another abstained from voting for either proposal, and instead voted for the Baseline, citing three separate ramping rates currently operational on respective interconnectors, believing that the implementation of either proposal could jeopardise system security by not factoring in said additional rates. In their Grid Code Consultation Response, the collective EU TSOs voted that neither proposal facilitated Grid Code Objective C.

Our Position

We consider that WAGCM1 will have a neutral effect on the facilitation of Grid Code Objective C. As WAGCM1 maintains the operational ramping rate limit of 100MW/min, this maintains current levels of system flexibility and capability to respond to system demand and market conditions. In maintaining the operational ramping rate limit, WAGCM1 does not advance nor negatively impact this flexibility.

Alternatively, we consider that the Original Proposal would have a negative impact on Grid Code Objective C. The Original Proposal's suggested maximum ramping rate of 50MW/min would be half of the current 100MW/min rate limit. We expect, if applied, operationally this would reduce current system flexibility, thus limiting the response time to system demand and market conditions, in turn potentially negatively impacting system security and efficiency. Additionally, this would contradict currently established operational maximums within existing agreements between NGESO and other relevant TSOs, potentially requiring renegotiation of said agreements.

In consideration of the concerns of the panel member who noted that neither proposal factors in the three separate ramping rates on respective interconnectors, we do not consider this to be problematic in respect of WAGCM1. By codifying a maximum ramping limit in line with existing agreements and operational practice, while recognising the possibility of separate agreement with NGESO, we do not agree that WAGCM1 does not take account of existing agreements with limits set below 100MW/min. Our expectation is that those arrangements will be unaffected by the implementation of WAGCM1.

In respect of the Original Proposal, we note that the intention (as with WAGCM1) is to codify a *maximum* ramp rate, unless otherwise agreed with NGESO. As a result, we consider it likely that the separate lower ramping rates of the connected SEM (Irish Single Energy Market) and NSL (North Sea Link) interconnectors would be unaffected, although as set out above, we have concerns as regards to those agreements which currently have ramping limits above 50MW/min (for example, if NGESO were to operationalise a limit of 50MW/min in contradiction of those agreements).

As such, we expect WAGCM1 to have a neutral impact on the facilitation of Grid Code Objective C.

D) to efficiently discharge the obligations imposed upon the licensee by this licence and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency;

All voting Grid Code Review Panel members agreed unanimously that WAGCM1 facilitates Grid Code Objective D. Of the 11 respondents to the Code Administrator Consultation, eight considered WAGCM1 to better facilitate Grid Code Objective D. A majority of the voting panel members (four out of seven) also considered the Original Proposal to better facilitate Grid Code Objective D. Where reasons were given in support of this objective, members argued that the solutions ensured compliance with SOGL Article 119. In their Grid Code Consultation Response, the collective EU TSOs voted that neither proposal facilitated Grid Code Objective D.

Our Position

We consider that both WAGCM1 and the Original Proposal will have a neutral effect on the facilitation of Grid Code Objective D. While the codification of the ramping rate improves transparency and clarity in respect of obligations arising from EU law (as assimilated), given the requirements of Article 119 of SOGL are already satisfied by the interim methodology approved by Ofgem on 6 August 2019, neither proposal secures compliance with any outstanding legal obligation arising from the Electricity Regulation. As such, we consider both proposals to be neutral against this objective.

E) to promote efficiency in the implementation and administration of the Grid Code arrangements

Three of the eight members of the Grid Code Review Panel considered WAGCM1 to facilitate Grid Code Objective E, whilst the remaining voting members considered it to be neutral. Of the 11 respondents to the Code Administrator Consultation, eight considered WAGCM1 to better facilitate Grid Code Objective E. With regards to the Original Proposal, three panel members considered the impact against Grid

Code Objective E to be neutral, whilst two considered there to be a negative impact and a further two considered there to be a positive impact. In their Grid Code Consultation Response, the collective EU TSOs voted that neither proposal facilitated Grid Code Objective E.

Our Position

We consider that both WAGCM1 and the Original Proposal will have a positive effect on the facilitation of Grid Code Objective E. In codifying a ramping rate into the Grid Code, both proposals provide greater transparency to relevant parties. In providing a formally codified ramping rate, which is absent under current arrangements, both proposals allow for greater efficiency in the implementation and administration of the Grid Code.

Issues with the CBA of the Original Proposal

We share the concerns of the Workgroup and consultation respondents in relation to the CBA. We consider that the potential balancing cost savings indicated by the CBA in support of the Original Proposal were not proven and overestimate the benefits of a ramp rate reduction by omitting key considerations from the CBA assessment. We also consider that the potential for consumer savings is outweighed by additional concerns which the CBA has not sufficiently considered.

In considering the potential for consumer savings, we believe the CBA would have benefitted from deeper consideration of the potential for negative impacts from the implementation of the Original Proposal. The CBA does not consider a scenario in which a lower ramping rate limit of 50MW/min is not accepted by TSOs, risking major misalignment, especially as this relates to existing agreements between NGESO and other relevant TSOs. It assumes that a ramping limit of 50MW/min would be rolled out universally, but we are unclear of the mechanism by which NGESO would achieve this. The full suggested benefits of implementing the Original Proposal as set out by the CBA would only be realisable if said agreements between NGESO and other relevant TSOs could be renegotiated by NGESO successfully – of which there is no guarantee. We consider that the potential for consumer savings is outweighed by the risks of such scenarios, which we do not believe the CBA has sufficiently considered.

Finally, we consider that the CBA would have benefitted from additional evidence to substantiate the potential benefits of a ramping rate limit of 50MW/min and could have considered a broader range of scenarios. It would also have benefitted from greater transparency of the information it both utilises and provides.

As a result of these doubts surrounding the CBA's claims, it is difficult to objectively assess the potential benefits of the implementation of the Original Proposal weighed against the aforementioned risks it poses. As such, we maintain that the claims of savings under by the Original Proposal's implementation set out in the CBA were not adequately demonstrated. The CBA's evidence for the probability of scenarios where a 50MW/min ramping rate limit would be necessary was likewise insufficiently demonstrated.

EBGL Regulation

In accordance with Article 18 of the Commission Regulation (EU) 2017/2195 establishing a guideline on electricity balancing,¹⁰ as amended by the Electricity Network Codes and Guidelines (Markets and Trading) (Amendment) (EU Exit) Regulations 2019 (the EBGL Regulation),¹¹ NGESO is required to develop and maintain terms and conditions (T&Cs) for balancing service providers and balance responsible parties. On 8 October 2019¹², we published our decision to confirm, upon satisfaction of certain conditions, that the T&Cs proposed by NGESO are the T&Cs required by Article 18 of the EBGL Regulation. On 25 June 2020, all the necessary conditions were met and the proposed T&Cs came into force in Great Britain.

We note that the proposed legal text changes for Grid Code modification GC0154 include changes which affect the T&Cs by modifying sections BC1 and BC2 of the GC, which are mapped onto the T&Cs per section GR.B.¹³

Next Steps

While we are deciding in favour of WAGCM1, we fully acknowledge the pressures that increased interconnector ramping can impose upon day-to-day operations for the NGESO control room. We consider it important to emphasise that our decision to instruct WAGCM1 be implemented does not mean that any future proposals regarding ramping rate or alternative solutions which can be demonstrated as better facilitating achievement of the Grid Code Objectives, for example via improved security of supply and the possibility of the removal of blanket restrictions on interconnectors, would not be

¹⁰ Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing, The EBGL Regulation, came into force on 18 December 2017. Accessible at: [Regulation - 2017/2195 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2017/2195/oj)

¹¹ The UK SI amendment of the EBGL Regulation is accessible at:

https://assets.publishing.service.gov.uk/media/5c17d6b440f0b60c8d601a2c/ENC_Markets_and_Trading_SI.pdf

¹² Our 8 October 2019 decision is accessible at: <https://www.ofgem.gov.uk/publications-and-updates/decision-transmission-system-operators-proposal-terms-and-conditions-related-balancing>

¹³ Mapping of EBGL Regulation Article 18 National Terms and Conditions requirements to the existing GB Electricity Market frameworks can be found at: <https://www.nationalgrideso.com/document/146936/download>

considered. We would consider any future proposals on their merits and nothing in this letter fetters our discretion in relation to any subsequent code modification request.

Decision notice

In accordance with Standard Condition C14 of the Transmission Licence¹⁴, the Authority hereby directs that the WAGCM1 Grid Code modification proposal: *Codify 100MW/min ramp rate into the Grid Code as per SOGL Article 119 1 (c)* be made.

As a consequence of the above, we also approve the amendment to the T&Cs related to balancing resulting from the modification of sections BC1 and BC2 of the Grid Code.

Mo Rahee, Head of Cross Border Market Arrangements

Signed on behalf of the Authority and authorised for that purpose.

¹⁴ [Electricity Transmission Standard Licence Conditions 01 04 2022 \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/consult/condln/condlnstd/condlnstd01042022)