

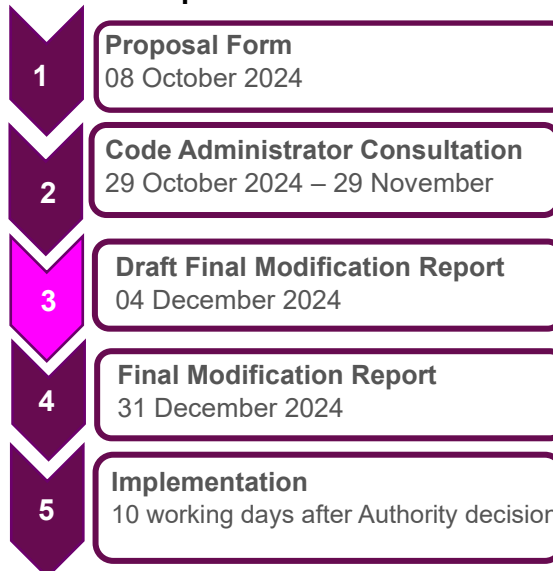
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**Draft Final Modification Report**

# GC0175: Removing references to “Fax” or “Facsimile” within the Grid Code

**Overview:** This modification seeks to remove references to “fax” and “facsimile” from the Grid Code in order to reflect both current and future methods of communication between relevant Users and the National Energy System Operator (NESO) due to the national decommissioning of the Public Switched Telephone Network (PSTN).

**Modification process & timetable**



**Have 20 minutes?** Read the full [Draft Final Modification Report](#)

**Have 90 minutes?** Read the full [Draft Final Modification Report and Annexes](#).

**Status summary:** The Draft Final Modification Report has been prepared for the recommendation vote at Panel.

**Panel recommendation:** The Panel will meet on 12 December 2024 to carry out their recommendation vote.

**This modification is expected to have a: **Medium impact**** on Generators, Demand Users, Interconnectors, Distribution Network Operators, NESO

**Modification drivers:** Efficiency, EU Compliance, GB Compliance, New Technologies, System Operability, System Security, Transparency

**Governance Route** Standard Governance modification to proceed to Code Administrator Consultation

**Who can I talk to about the change?**

**Proposer:**

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## What is the issue?

NESO currently use fax machines within the Electricity National Control Centre to send and receive data from Primary and some Secondary Balancing Mechanism Units (BMUs). A number of these data submissions from BMUs support critical functions such as System Restoration, by transmitting data such as Unit Availability. Fax machines are ageing technology, with hardware support contracts ending (or have ended) and replacement parts difficult to source. The management of paper output is also time-consuming for reporting and audit purposes.

## Why change?

The Public Switched Telephone Network (PSTN) that fax machines use, is due to be switched off by the start of 2027<sup>1</sup> which will result in all non-voice services that use this network ceasing. In readiness for the PSTN switch off, an alternative method of communication between relevant Users and NESO will need to be established to ensure current interactions can continue. It should also maintain the stability and audit trail that the current fax solution provides.

## What is the proposer's solution

While there is an option to upgrade existing faxes to utilise digital line technology (via a digital adapter), this still does not address the current issues with the use of faxes in terms of hardware support and paper management. With this in mind, we believe a more future proof digital solution is required that provides the same functionality of the current fax solution but improves efficiencies and costs for Users.

The proposed solution, (to be defined under an “umbrella term” as the “Designated Information Exchange System”), will be an Azure based platform which will allow both Users and NESO to provide web form submissions and acknowledgements which are currently transmitted via fax through the use of paper forms.

The platform will be accessed through the Users Internet Service Provider (ISP) via a secure, encrypted login which will be maintained and administered by NESO.

The platform will require no software licence obligations from the User and will be designed to be extendable to ensure any future requirements can be incorporated, and scalable to accommodate both existing and future Users.

It is proposed that a phased approach will be introduced following the implementation of the proposal with Users being moved across to the new platform over a period of time that we will be agreed. The rationale for a phased approach is to ensure Users are fully comfortable with the use of the new platform prior to the phase out of fax machines.

The proposed new definition of the “Designated Information Exchange System”, will also include “facsimile” in order for the solution to accommodate the phased roll out of the

<sup>1</sup> <https://business.bt.com/why-choose-bt/insights/digital-transformation/uk-pstn-switch-off/>

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platform from the implementation of the proposed changes where both the use of faxes and the platform will be in use.

This proposal will also take the opportunity to update references to fax or facsimile within the Grid Code that relate to “non-Control Room” activities. For example, Connections Compliance to reflect the current methods of communication that now takes place for these interactions, such as email.

## Legal text

See Annex 2 which details the proposed changes across the Grid Code.

## 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  | <b>Positive</b><br>The proposal should create efficiencies in relation to communication between Users and NESO and replace outdated technologies.   |
| (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); | <b>Neutral</b>  |
| (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;  | <b>Positive</b><br>The proposal should create efficiencies in relation to communication between Users and NESO and replace outdated technologies. This in turn should have a positive impact from a system security point of view as increased response times should be realised. |
| (d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with  | <b>Neutral</b>  |

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|   |                |
|---|----------------|
| the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and |                |
| (e) To promote efficiency in the implementation and administration of the Grid Code arrangements                        | <b>Neutral</b> |

## Code Administrator Consultation Summary

The Code Administrator Consultation was issued on 29 October 2024, closed on 29 November 2024 and received 2 responses. A summary of the responses can be found in the table below, and the full responses can be found in Annex 3.

| <b>Code Administrator Consultation Summary</b>  |   |
|---|---|
| <b>Question</b>   |   |
| Do you believe that the GC0175 Original Proposal better facilitates the Grid Code Objectives? | One respondent noted that the change would better facilitate objective (a) and both respondents thought the change would better facilitate objective (c).   |
| Do you support the proposed implementation approach?  | Both respondents supported the proposed implementation approach, noting that a phased approach was a sensible solution.   |
| Do you have any other comments?   | One respondent queried whether a purely digital way of communicating with NESO would be a concern during digital disruption, however noted they did not have sufficient knowledge of OPTEL lines and whether this would negate the risk.<br><br>This respondent also highlighted concern with the volume of proposed platforms used by NESO, querying if the same platform could be used for multiple purposes. |
| <b>Legal text issues raised in the consultation</b>   |   |
| No legal text issues were raised in the consultation.   |   |
| <b>EBR issues raised in the consultation</b>  |   |

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Both respondents agreed that GC0175 does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code. One respondent noted that this was a minimal interaction.

### NESO response to EBR issues raised in the Code Administrator Consultation:

NESO agrees there is a minimal EBR interaction as a result of GC0175, however, the minimum EBR consultation requirement has been met, and the modification delivers benefits as set out in the Proposer’s assessment against Grid Code Objectives.

### Panel Recommendation Vote

The Panel will meet on 12 December 2024 to carry out their recommendation vote.

They will assess whether a change should be made to the Grid Code by assessing the proposed change and any alternatives against the Applicable Objectives.

### Panel comments on EBR impacts

The Panel will discuss when they meet on 12 December 2024 to carry out their recommendation vote.

**Vote 1:** Does the Original facilitate the Applicable Objectives better than the Baseline?

### Panel Member: **Alan Creighton, Network Operator Representative**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

### Panel Member: **Alastair Frew, Generator Representative**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

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Panel Member: **Claire Newton, NESO**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

Panel Member: **Darshak Shah, Generator Representative**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

Panel Member: **David Monkhouse, Offshore Transmission Licensee**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

Panel Member: **Graeme Vincent, Alternate Network Operator Representative**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

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Panel Member: **John Harrower, Generator Representative**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

Panel Member: **Robert Longden, Supplier Representative**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

Panel Member: **Richard Woodward, Onshore Transmission Licensee**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |

Panel Member: **Sigrid Bolik, Generator Representative**

|                  | Better facilitates AO (a)? | Better facilitates AO (b)? | Better facilitates AO (c)? | Better facilitates AO (d)? | Better facilitates AO (e)? | Overall (Y/N) |
|------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------|
| Original         |                            |                            |                            |                            |                            |               |
| Voting Statement |                            |                            |                            |                            |                            |               |
|                  |                            |                            |                            |                            |                            |               |



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**Vote 2** – Which option (Original Proposal or Baseline) best facilitates the applicable Grid Code objectives?

| Panel Member     | Best Option | Which objectives does this option better facilitate? (If baseline not applicable). |
|------------------|-------------|--|
| Alan Creighton   |             |  |
| Alastair Frew    |             |  |
| Claire Newton    |             |  |
| Darshak Shah     |             |  |
| David Monkhouse  |             |  |
| Graeme Vincent   |             |  |
| John Harrower    |             |  |
| Robert Longden   |             |  |
| Richard Woodward |             |  |
| Sigrid Bolik     |             |  |

**Panel conclusion**

Panel will meet on 12 December 2024 to carry out their recommendation vote.

**When will this change take place?**

**Implementation date**

10 working days after authority decision date.

**Date decision required by**

As soon as possible

**Implementation approach**

It is proposed that a phased approach will be introduced following the implementation of the proposal with Users being moved across to the new platform over a period of time that we will be agreed. The rationale for a phased approach is to ensure Users are fully comfortable with the use of the new platform prior to the phase out of fax machines.

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### Interactions

- CUSC       BSC       STC       SQSS  
 European Network Codes     EBR Article 18 T&Cs2     Other modifications     Other

Whilst EBR interactions do exist, these have been identified as minimal interactions.

Changes will also be required to the CUSC and STC Procedures to reflect the changes that are being proposed to the Grid Code in respect of the removal of references to Fax and Facsimile.

### Acronyms, key terms and reference material

| Acronym / key term | Meaning                                  |
|--------------------|--|
| BMU                | Balancing Mechanism Unit                 |
| BSC                | Balancing and Settlement Code            |
| CUSC               | Connection and Use of System Code        |
| EBR                | Electricity Balancing Regulation         |
| GC                 | Grid Code                                |
| GCDF               | Grid Code Development Forum              |
| ISP                | Internet Service Provider                |
| PSTN               | Public Switched Telephone Network        |
| STC                | System Operator Transmission Owner Code  |
| SQSS               | Security and Quality of Supply Standards |
| T&Cs               | Terms and Conditions                     |

### Annexes

| Annex   | Information   |
|---------|---------------|
| Annex 1 | Proposal form |
| Annex 2 | Legal Text    |

<sup>2</sup> If your modification amends any of the clauses mapped out in Annex GR.B of the Governance Rules section of the Grid Code, it will change the Terms & Conditions relating to Balancing Service Providers. The modification will need to follow the process set out in Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195). All Grid Code modifications must be consulted on for 1 month in the Code Administrator Consultation phase, unless they are Urgent modifications which have no impact on EBR Article 18 T&Cs. N.B. This will also satisfy the requirements of the NCER process.

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Annex 3

Code Administrator Consultation Responses