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## Draft Final Self-Governance Modification Report

# GC0164: Simplification of Operating Code No.2

**Overview:** This modification seeks to help Users to clearly identify and understand their obligations under Operating Code No.2 (OC2) by making it more accessible, easy to navigate and understand. This is the first modification resulting from the Alignment, Simplification and Rationalisation Workstream (ASRW) of the Digitalised Whole System Technical Code project.

### Modification process & timetable



**Have 10 minutes?** Read our [Executive summary](#)

**Have 60 minutes?** Read the full Draft Final SG Modification Report

**Have 80 minutes?** Read the full Draft Final SG Modification Report and Annexes

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

**Panel determination:** The Panel will meet on 27 February 2025 to carry out their determination vote.

**This modification is expected to have a: Low impact** on Restoration Service Providers, Generators, Interconnector Owners, Transmission Owners, Non-Embedded Customers, Network Operators and The National Energy System Operator (NESO)

**Modification drivers:** Efficiency and Transparency

**Governance route** Self-Governance modification with assessment by a Workgroup

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

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## Executive summary

This Modification seeks to simplify the text in Operating Code 2 (OC2) within the Grid Code to help Users identify and understand the obligations placed upon them.

### What is the issue?

OC2 within the Grid Code is widely agreed to be overly complex, poorly structured, and difficult for Users to navigate. The text makes it difficult for Users to understand and comply with current processes or understand their own and others' obligations. It also contains Appendices which are more logically located in other sections of the Grid Code.

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

**Proposer's solution:** To simplify the text in OC2 ensuring any amendments have no material impact on any User or the NESO.

**Implementation date:** 10 Business Days following the Grid Code Panel decision.

**Workgroup conclusions:** The Workgroup concluded unanimously that the Original better facilitated the Applicable Objectives than the Baseline.

**Code Administrator Consultation:** The Code Administrator Consultation received 4 non-confidential responses.

**Panel determination:** Panel will meet on 27 February 2025 to carry out their determination vote.

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

Ease of use of OC2 which will help Users understand and implement their obligations correctly and for NESO to administer the Grid Code. It is believed also, that simplifying the text could encourage potential market entrants, as well as encouraging innovative industry entrants.

### Interactions

This modification has an impact on the EBR Article 18 Terms and Conditions, due to minor changes within Balancing Code 1 and Balancing Code 2.

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## What is the issue?

The Grid Code is widely agreed to be overly complex, poorly structured, difficult to navigate and complicated for users to understand the obligations placed upon them. The Digitalised Whole System Technical Code (dWSTC) project<sup>1</sup> was set up to address some of the challenges of using the technical codes and is an opportunity to support the Energy Codes Reform (ECR) objective of code simplification.

The Operational Planning and Data Provision (OC2) is one section within the Grid Code where the complexity of the text could make it difficult for the reader to understand and comply with current processes or understand their own and others' obligations. It also contains Appendices which are more logically located in other sections of the Grid Code.

## Why change?

The dWSTC project was established to create an accessible and agile code system which is easier for both new and established market participants to access, understand and navigate than the current codes. The intention is to achieve this by removing inefficiencies in operating and maintaining the codes and encouraging new industry entrants. This will also set up the codes for further development to match the current pace of change in the industry.

NESO have received feedback from some parts of the industry, indicating that simplification of codes would deliver benefits to their organisations.

OC2 has been chosen as a starting point for simplification by the Alignment, Simplification & Rationalisation Workstream (ASRW) since it is both outdated and not one of the most heavily used parts of the Code. It therefore presents a good opportunity to test out the simplification principles (shorter and more concise text, use of diagrams, plain English, avoiding duplication of text, consider simplifying text, rationalising definitions, remaining legally enforceable) and processes with the resources currently available. In addition,

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<sup>1</sup> [[Digitalised Whole System Technical Code](#)]

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simplification of OC2 should result in better understanding of OC2's provisions by existing and new Users.

The GC0164 Workgroup established by the Grid Code Review Panel has developed the improvements proposed by the ASRW which are presented in this Workgroup Report for consideration. The proposal represents the first attempt to incorporate Grid Code simplifications flowing from the dWSTC project.

## What is the solution?

### Proposer's solution

The modification is not intended to change any obligations placed on Users in the current OC2 text. The primary aim is to make OC2 easier to understand and apply. The Proposer believed that the process followed within this modification might prove helpful while considering streamlining and improving other codes. In particular as part of the process of simplifying and rationalising OC2, extensive use was made of diagrams, avoiding duplication and using plain English. In addition the opportunity was taken to move some sections of legal text out of OC2 and place them into other sections of the code where this was deemed as more appropriate. For example, the section on Generator Performance Charts has been moved from OC2 Appendix 1 into the Planning Code and any changes to definitions used in OC2 have been applied to the Glossary and Definitions. It is important here to note that where changes have been made to other sections of the Grid Code (e.g. the Planning Code and Glossary and Definitions) these are consequential updates as a result of the rationalisation of OC2 and do not attempt to rationalise or simplify the Planning Code or Glossary and Definitions. These changes are summarised in more detail below and the full legal text is available in **Annex 4**.

Collaboration with electricity industry stakeholders is essential in gaining a better insight as to what adds most value in the attempt to simplify the Grid Code, and the formal modification of OC2 will be a key building block in the process. While every effort was made by the Proposer to engage industry stakeholders during this work, this was a challenge at times due to limited engagement, which may have been due to resource constraints and prioritisation of other work. The ASRW has provided industry parties with the opportunity to provide early and detailed input towards the structure, content, breadth, and depth of redrafting OC2, and had developed some proposed legal text

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before the proposal entered this formal code modification process. The GC0164 Workgroup agreed to retain one set of definitions instead of creating a separate set for each simplified section of the Grid Code.

The Proposer recommended that, in addition to the specific code modification, the Workgroup could consider how effective the process of proposal development has been, and whether it is suitable for wider adoption in relation to Grid Code alignment, simplification and rationalisation modifications.

Due to the nature of this Modification, i.e. seeking to make OC2 clearer by reviewing and re-writing sections of the Code without altering the requirements, it has been challenging to clearly present the changes made. The tables below contain a summary of the changes made across the Grid Code.

### Summary of the changes to OC2

Section of OC2	What has changed
1. The Introduction, Objective, and Scope	Have been rewritten in plain English and the text has been rationalised.
2. Descriptions of procedures	Have been simplified and rationalised. Sections describing timelines have been amended to include diagrams to make them more comprehensible.
3. Text	Flowcharts have been used to remove repetitive text.  Overall text length (number of words) has been reduced
4. Generator performance charts	Are proposed to be relocated in the Planning Conditions
5. All sections	Changes have been made to improve readability and make text more concise

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### Summary of the Changes to the Planning Code

Section of the PC	What has changed
1. PC.A.3.2.2(f)	Sub item (vi) 'Generator Performance Chart(s) shall be in the format indicated in the Planning Code Appendix G' was added to introduce location of the charts in the appendix G.
2. APPENDIX G	Introduced as new location of Performance Chart Examples

### Summary of changes to the Glossary and Definitions

Section of the Glossary and Definitions	What has changed
<b>National Electricity Transmission System</b>	'NETS' has been added as an abbreviated form of the ' <b>National Electricity Transmission System</b> '.

### Changes to other sections of the Grid Code

Paragraph references to OC2 have also been updated within Operating Code 5, European Compliance Processes, Balancing Codes 1 and 2, General Conditions and Data Registration Code.

### Workgroup considerations

The Workgroup convened 12 times to discuss the perceived issue, detail the scope of the proposed defect, discuss the proposed solution, and assess the proposal in terms of the Applicable Code Objectives.

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The Workgroup held their Workgroup Consultation between 07 June 2024 – 08 July 2024 and received 3 responses. The full responses and summary can be found in **Annex 6**.

### **Consideration of the proposer’s solution**

The modification initially followed the Standard Governance route, but it was agreed by the Panel following Workgroup 1 that GC0164 should proceed to a Self-Governance route, as the Authority had assessed the modification Proposal form and decided that the intended changes to OC2 bore no material impact to Grid Code Users.

Grid Code Panel members met on 25 January 2024 and agreed that GC0164 would follow the Self-Governance route and that the Terms of Reference should be updated accordingly. The Terms of Reference can be found in **Annex 2**.

During discussions on the legal text for OC2, the Workgroup reviewed the document on a page-by-page basis, analysing the text that had been proposed by the ASRW and ensuring the changes made were fit for purpose. In some instances, members decided to retain the original text where it was thought there may be material impacts by changing it, or where it was thought the text was already transparent.

A Workgroup member expressed concern with changing or removing text from the current version of OC2, stating removing detail may leave the code open for interpretation. Responding, the Proposer reiterated to members the intention was to simplify the text for OC2, and to be as clear and concise as possible.

Another Workgroup member highlighted that when looking into the definitions, consideration should be given to the impact it may have on other parts of the Grid Code and other Industry codes in general. The Proposer agreed, advising it is not the intention for any amendments to have a material impact and if amending the definitions is too large a task then this could be carried out separately.

### **Term of Reference (f) discussion**

Members also discussed item (f) in the Terms of Reference “Consider whether it is appropriate to have two sets of Grid Code definitions, one set to use with OC2 and a second (existing) set to be used for all other parts of the Grid Code”. Workgroup members agreed that having two sets of the Glossary and Definitions would cause confusion and therefore it was sensible to have one single set that covers the entire Grid Code.

### **Legal Text Discussions**

During legal text discussions in Workgroup meeting 4, a member sought clarification regarding references to Generator Performance Charts in Appendix G of the Planning Code.

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The Proposer confirmed there was reference in OC2 regarding Generator Performance Charts, and that the key question was where in the Planning Code the reference should be introduced. It was agreed that an offline conversation would take place to resolve the issue and details would be shared with the Workgroup at the next meeting.

This was resolved after a discussion offline; the Workgroup member was happy for the example Generator Performance Charts to be moved to a new Appendix G within the Planning Code. New reference text was proposed and drafted in PC.A.3.2.2(f) as a result of the discussion.

## Workgroup consultation summary

The Workgroup held their Workgroup Consultation between 07 June – 08 July 2024 and received 3 responses. The full responses and summary can be found in **Annex 6**.

### Meeting Applicable Objectives:

- Respondent one believed the original proposal better facilitated Grid Code objectives (a), (b), (c) and (d).
- Respondent two believed the original proposal better facilitated Grid Code objective (e).
- Respondent three believed the original proposal better facilitated Grid Code objectives (a), (c) and (e).

**Implementation approach:** All three respondents supported the implementation approach.

**Alternatives:** None of the respondents wished to raise an alternative.

### Have the changes to OC2 made it easier to understand than the existing version:

Two respondents agreed that the changes proposed had made it easier to understand than the existing version. One respondent advised that it was difficult to form a view.

### Would the Grid Code obligation remain the same if this version was implemented:

Two respondents agreed that the obligation would not change. One respondent advised that some requirements had been changed/removed, adding that changes may not have been intentional and were due to editorial changes. This was subsequently addressed within Workgroup discussions following the Workgroup Consultation.

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**The Workgroup view is there should only be one set of Glossary and Definitions applicable to the entire Grid Code, do you agree:**

Two respondents agreed that there should only be one set of Glossary and Definitions, as having multiple definitions for the same defined term would cause confusion. One respondent did not agree, advising this was a fundamental mistake which would hamper the dWSTC project.

**The Generators Performance Charts will move from the Operating Code to the Planning Code under this Proposal, do you agree with this change:**

All respondents agreed with this change; one respondent added that there are some further areas of OC2 which relate to the Generator Performance Chart which could be moved into the Planning Code.

**To help quantify the industry resources required to implement this type of change, the consultation asked respondents to indicate the number of hours spent reading and responding to the consultation:**

Respondent one advised it was difficult to quantify a number as they had spent more than one hundred hours overall working on the dWSTC project and GC0164 modification.

Respondents two and three advised they had spent approximately 5 and 10 hours reading and responding to the consultation.

**Post Workgroup Consultation discussions**

During the review of the legal text, several amendments were highlighted by a Workgroup member, the Proposer agreed to make the necessary changes and share the updates with Workgroup members for their review.

**Terms of Reference discussion**

During Workgroup 10, members discussed each Term of Reference below:

- a) Implementation and costs

It was suggested that Workgroup members share details of the time and effort invested during the modification process, this information could then be taken into consideration when deciding on similar projects in the future.

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There were four responses to the question asked, of these the time and effort recorded ranged from 1 hour up to approximately one hundred hours in relation to time and effort invested.

- b) Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text

A Workgroup member highlighted to the group that other areas within Grid Code should be reviewed to ensure nothing has been missed, and updates were reflected correctly in OC2. The Proposer agreed to do a full review of the Grid Code and share their findings with members.

The Proposer had previously reviewed the Grid Code to ensure the suggested changes within the legal text would not have any adverse effect but agreed to do a further assessment. At a later meeting the Proposer advised Workgroup members that no issues were found after a second review.

- (c) Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report

The Proposer engaged with industry through various forums to obtain feedback in relation to the OC2 changes. A Workgroup member highlighted that it was important that feedback be received by industry parties affected by the OC2 changes. It was agreed that the Proposer would attend the OC2 Forum and share the changes made to OC2 and request feedback. Workgroup members also agreed to assist by reaching out to relevant parties to request their input.

During the OC2 Forum on 24 September 2024, the Proposer shared the GC0164 documentation with the forum members. The ask was for members to feedback via a questionnaire whether the suggested changes made the document easier to use for industry, those members who responded felt the revised OC2 changes were easier to follow.

The Chair explained that after reaching out to Industry, receiving feedback from Stakeholders at the OC2 forum and welcoming a new Workgroup member, Terms of Reference (c) had been fulfilled. The Workgroup members agreed and noted

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that the Proposer could not have done more to engage with industry to gain their feedback.

### (d) Consider implications to sections linked to the Regulated Sections of the Grid Code

During discussions, a question was raised regarding Term (d), a member asked whether the implications on the Electricity Regulation (Electricity Balancing) Terms and Conditions had been considered.

The Proposer explained that this was addressed in earlier Workgroup discussions and confirmed that OC2 does not have any EBR implications. Another Workgroup member supported this view and added that the modification does not change the obligations within OC2 and should not have any implications.

### (e) Consider whether the proposed redrafted of OC2 is easier for stakeholders to read and understand and that the existing obligations on all parties set out in the current OC2 version have been retained.

During Workgroup discussions, it was agreed that although the Proposer had tried numerous times to engage with Stakeholders, further engagement was needed to ensure the redraft adequately addresses their concerns.

As set out in the Terms of Reference (e) the Proposer attended the OC2 Forum, sharing the suggested changes and requested feedback from members. Those members who responded agreed the redraft was easier to read and the obligations on all parties set out in the current OC2 had been retained. This was reiterated by Workgroup members during discussion through the modification process.

### (f) Consider whether it is appropriate to have two sets of Grid Code definitions, one set to use with OC2 and a second (existing) set to be used for all other parts of the Grid Code.

The Proposer during Workgroup discussion advised that two sets of Grid Code definitions had been considered but was deemed impractical due to the potential confusion it would cause for readers. Workgroup members agreed noting that having two sets of definitions would contradict the overall objective of simplifying the code.

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- (g) Workgroup to assess and form a view whether there are material changes or not to the modification.

Workgroup members have reviewed the legal text changes and confirmed they agreed there have been no material changes.

## Legal text

The legal text consulted on at Code Administrator Consultation can be found in **Annex 4**. A summary of legal text queries raised during the Code Administrator Consultation can be found in **Annex 5**.

## What is the impact of this change?

### Proposer's assessment against Code Objectives

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 This could make the operation of the system more efficient and also reduce operational costs for parties	<b>Positive</b> Users will find it quicker to find information, saving time in determining compliance requirements.
(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>Positive</b> Ease of use of OC2 will allow more Users to understand OC2, encouraging new Users to enter the industry, promoting competition and encouraging innovative industry entrants.

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(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;	<p><b>Positive</b></p> <p>A more usable version of OC2 will make it easier for Users to implement their obligations correctly.</p>
(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	<p><b>Neutral</b></p>
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	<p><b>Positive</b></p> <p>A more usable version of OC2 will make it easier for Users to implement their obligations correctly and for NESO to administer the Grid Code.</p> <p>Establishing a streamlined modification process for code alignment, simplification and rationalisation will help deliver more wide-ranging efficiency improvements to the codes, including Energy Code Reform.</p>

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Proposer’s assessment of the impact of the modification on the stakeholder / consumer benefit categories	
Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	<b>Positive</b> Clearer obligations and easier implementation of them will help improve system reliability.
Lower bills than would otherwise be the case	<b>Positive</b> Lower Grid Code administration overheads across the industry will help to reduce bills.
Benefits for society as a whole	<b>Neutral</b>
Reduced environmental damage	<b>Neutral</b>
Improved quality of service	<b>Positive</b> Simplification of OC2 will result in more efficient use in complying with and understanding OC2.

## Workgroup vote

The Workgroup met on 18 October 2024 to carry out their Workgroup vote. The full Workgroup vote can be found in **Annex 7**. The table below provides a summary of the Workgroup members view on the best option to implement this change.

The Applicable Grid Code Objectives are:

### Grid Code

- a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity

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- 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);
- 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;
- 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
- e) To promote efficiency in the implementation and administration of the Grid Code arrangements

The Workgroup concluded unanimously that the Original better facilitated the Applicable Objectives than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	5

## Code Administrator Consultation Summary

The Code Administrator Consultation was issued on the 02 December 2024, closed on 16 January 2025 and received 4 non-confidential responses (and 0 confidential responses). A summary of the responses can be found in the table below, and the full responses can be found in **Annex 10**.

Code Administrator Consultation summary	
Question	
Do you believe that the GC0164 Original Proposal or better facilitates the Grid Code Objectives?	Three respondents believed the Proposal better facilitates objective (e), with one respondent also noting benefits on objectives (a) and (c).

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	One respondent noted that as no requirements are changing, there should be no effect on any of the Grid Code objectives.
Do you support the proposed implementation approach?	All four respondents supported the proposed implementation approach, and all noted that they preferred the Original solution to the Baseline.
Do you have any other comments?	<p>Some respondents noted that the modification should simplify OC2 and make it easier to understand.</p> <p>Respondents noted that the benefits case of the modification should be reviewed, referencing the intangible benefits of the modification and the industry resource required for similar modifications.</p> <p>Respondents highlighted that the Glossary and Definitions may need additional work if further sections of code are to be simplified.</p>
<b>Legal text issues raised in the consultation</b>	
<p>Three respondents raised issues with the legal text. A summary of legal text queries raised during the Code Administrator Consultation can be found in <b>Annex 5</b>.</p> <p>The Proposer of GC0164 has advised that they believe some of the legal text queries need further review by the Workgroup.</p>	
<b>EBR issues raised in the consultation</b>	
<p>All four respondents indicated that they agreed with the Workgroup’s assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code. One respondent noted that the aim of the modification is to simplify OC2 and not make changes to the obligations of Grid Code Users, and as such should not impact on the Article 18 terms and conditions.</p>	

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The Code Administrator has since identified an EBR impact, due to minor changes to Balancing Code 1 and Balancing Code 2 to change paragraph references to OC2.

### **NESO response to EBR issues raised:**

NESO advises that the changes to Balancing Code 1 and Balancing Code 2 are solely to update paragraph references to Operating Code 2, where the obligations have been moved within Operating Code 2. As such, there is no change in obligations so there is no impact on the EBR objectives.

### **Panel Determination vote**

The Panel will meet on the 27 February 2025 to carry out their determination 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 Legal text**

Ahead of the vote taking place, the Panel will consider the legal text amendments proposed as part of the Code Administrator Consultation and agree next steps. A summary of legal text queries raised during the Code Administrator Consultation can be found in **Annex 5**.

### **Panel comments on EBR**

The Panel will discuss when they meet on the 27 February 2025 to carry out their determination vote.

## **When will this change take place?**

### **Implementation date**

16 April 2025

### **Date decision required by**

27 February 2025, otherwise the implementation date will be delayed.

### **Implementation approach**

There are no system changes required to change as a result of this modification.

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## Interactions

- |   |  |  |                                |
|---|--|--|--------------------------------|
| <input type="checkbox"/> Grid Code              | <input type="checkbox"/> BSC   | <input type="checkbox"/> STC                 | <input type="checkbox"/> SQSS  |
| <input type="checkbox"/> European Network Codes | <input checked="" type="checkbox"/> EBR Article 18 T&Cs <sup>2</sup> | <input type="checkbox"/> Other modifications | <input type="checkbox"/> Other |

This modification has an impact on the EBR Article 18 Terms and Conditions, due to minor changes within Balancing Code 1 and Balancing Code 2.

## Acronyms, key terms and reference material

Acronym / key term	Meaning
ASRW	Alignment, Simplification and Rationalisation Workstream
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
dWSTC	Digitalised Whole System Technical Code
EBR	Electricity Balancing Regulation
ECR	Energy Codes Reform
NESO	National Energy System Operator
OC2	Operating Code No.2
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions

### Reference material

- [The Grid Code](#)
- [Digitalised Whole System Technical Code](#)

<sup>2</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 Electricity Balancing Regulation (EBR – 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.

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## Annexes

Annex	Information
Annex 1	Proposal Form
Annex 2	Terms of Reference
Annex 3	ASRW Considerations
Annex 4	Legal Text consulted on at Code Administrator Consultation
Annex 5	Summary of Legal text queries raised at Code Administrator Consultation
Annex 6	Workgroup Consultation responses
Annex 7	Workgroup vote
Annex 8	Action Log
Annex 9	Attendance Record
Annex 10	Code Administrator Consultation Responses