

Workgroup Consultation

GC0174: Review of obligations to provide EU Transparency Availability Data as specified in OC2.4.7

Overview: Following the approval of BSC Modification CPI583 (Rationalising publication of European Transparency Regulation data on Elexon Systems), the obligation for parties to submit EU Transparency Availability Data as specified in OC2.4.7 requires to be reviewed.

Modification process & timetable

1	Proposal Form 27 June 2024
2	Workgroup Consultation 28 February – 21 March 2025
3	Workgroup Report 14 May 2025
4	Code Administrator Consultation 29 May – 30 June 2025
5	Draft Modification Report 16 July 2025
6	Final Modification Report 29 July 2025
7	Implementation 15 September 2025

Have 5 minutes? Read our [Executive summary](#)
Have 30 minutes? Read the full [Workgroup Consultation](#)
Have 50 minutes? Read the full Workgroup Consultation and Annexes.

Status summary: The Workgroup is seeking your views on the work completed to date to form the final solutions to the issue raised.

This modification is expected to have a: **Low impact** on Generators, non – Embedded Customers and Electricity System Operator.

Modification drivers: Cross – Code change, Efficiency and Harmonisation

Governance route	Self – Governance modification with assessment by a Workgroup	
Who can I talk to about the change?	Proposer: Frank Kasibante Frank.kasibante1@nationalenergyso.com Phone: 07812 774066	Code Administrator Chair: Ren Walker Lurrentia.walker@nationalenergyso.com Phone: 07976 940855
How do I respond?	Send your response proforma to grid.code@nationalenergyso.com by 5pm on 21 March 2025.	

Public Contents

Executive Summary.....	3
What is the issue?.....	4
Why change?.....	4
What is the solution?.....	5
Proposer’s solution.....	5
Workgroup considerations.....	5
What is the impact of this change?.....	8
Proposer’s assessment against Code Objectives.....	8
When will this change take place?.....	9
Interactions.....	10
How to respond.....	10
Acronyms, key terms and reference material.....	11
Annexes.....	12



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Executive Summary

Following the UK leaving the European Union (EU), the UK Government have incorporated various EU regulations into Assimilated Law with some changes to certain requirements. In terms of the European Transparency Regulation (ETR) (Commission Regulation (EU) 543/2013), this has been incorporated into Assimilated Law with fairly minimal changes to the text, however the changes relate to the requirements for publishing data. The primary requirements specifying the data which has to be published, and its periodicity has not changed, it is only details relating to the central publishing platform which have changed. The Assimilated Law has changed the “Central Information Transparency Platform” to the “Reporting Service” which is currently the Elexon Insights website REMIT page. [CPI583](#) ‘Rationalising publication of European Transparency Regulation (ETR) data on Elexon Systems’ recognised that data being submitted for REMIT meets the obligations for relevant Users to submit the ETR data specified in OC2.4.7 in accordance with Schedule 6 of the Data Registration Code (DRC). Hence, Users who submit REMIT data directly to Elexon via REMIT do not need to submit the data to NESO, via MODIS to Elexon. Note that when Users are using REMIT data for compliance with OC2.4.7 purposes central publication of that data on the Elexon Insights website REMIT page is mandatory, unlike other REMIT requirements.

What is the issue?

Following approval of CPI583 on 02 November 2023, there are now options for the relevant parties as to how they submit legacy ETR data in respect of articles 7 to 15 of Retain EU Law (Commission Regulation (EU) 543/2013), to notify changes in unavailability of generation or consumption units. Currently these data require to be submitted via the Market Operation Data Interface System (MODIS) as specified in Operating Code (OC)2.4.7 of the Grid Code, but going forward REMIT data can be used and the Grid Code needs to be amended to include the options.

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

Proposer’s solution: The Proposers solution is to amend Grid Code Section OC2.4.7 as this references the requirements to provide specific data detailed in Schedule 6 of the Data Registration Code (DRC) which is also proposed to be amended under this proposal.

Implementation date: 15 September 2025

What is the impact if this change is made?

There will be a minimal impact on Users regarding REMIT obligations by amending OC2.4.7, as (1) REMIT obligations are enforced by Ofgem through relevant regulations, (2) regards the specific clause that NESO is proposing to amend in the Grid Code.

Public Interactions

This modification has been raised as a result of an approved BSC modification [CPI583](#), and has no further interactions with other modifications or EBR Article 18 Terms and Conditions.

What is the issue?

CPI583 (Rationalising publication of European Transparency Regulation (ETR) data on Exelon Systems), is a Balancing and Settlement Code (BSC) modification. It was raised by Exelon to review the ETR data provided by Market Participants and the ESO which, pre-January 2021, was submitted to the European Network of Transmission Operators for Electricity (ENTSO-E) data platform, known as the Electricity Market Fundamental Information Platform (EMFIP), via the Balancing Mechanism Reporting Service (BMRS).

- Due to the UK leaving the European Union (EU), there was no longer a legal requirement to submit the ETR data to ENTSO-E after January 2021, but it has continued to be published on BMRS (which on 01 June 2024, was replaced by the Exelon Insights Solution). CPI583 ([Change Proposal 1583](#)) identified a number of reports where this data is already being sent as part of the obligations under REMIT (Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency) or has no data reported.

Therefore, following the approval of CPI583 on 02 November 2023, the obligation for parties to submit EU Transparency Availability Data to the NESO via the Market Operation Data Interface System (MODIS) as specified in Operating Code (OC)2.4.7 is no longer required.

Why change?

As part of the Grid Code, relevant Users are obligated to provide EU Transparency Availability Data specified in OC2.4.7 in accordance with Schedule 6 of the Data Registration Code (DRC), which is sent via MODIS to Exelon.

The approved BSC modification CPI583 removes the obligation for relevant Users to submit this data to NESO as it is either no longer required or is already submitted via REMIT which is an Ofgem enforced obligation that sits outside of the Grid Code.

Operating Code (OC)2.4.7 was never intended to cover REMIT obligations, and this proposal does not remove the obligations under REMIT for relevant Users. Exelon have now also moved from BMRS to a new data platform (Exelon Insights Solution), and as a result, any data submitted to BMRS will no longer be published.

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What is the solution?

Proposer's solution

Initially the proposer's solution was to remove the obligation for the EU Transparency Availability Data currently specified in OC.2.4.7. in accordance with Schedule 6 of the Data Registration Code (DRC) to be sent from relevant Users to NESO via MODIS and then to Elexon. However, following the workgroup considerations described in the next section, it was changed to retain the existing text and modify the text to permit Users to submit the data to Elexon either directly using REMIT or via MODIS.

Workgroup considerations

The Workgroup convened 3 times to discuss the identified issue within the scope of the defect, develop potential solutions, and evaluate the proposal in relation to the Applicable Code Objectives.

Consideration of the Proposer's solution

The Proposer gave a presentation to the Workgroup to outline the proposal (which can be found in Annex 1). The Proposer stated that REMIT is a regulatory requirement enforced by Ofgem. The submission of REMIT data is not a Grid Code obligation, with Users encouraged, but not mandated, to submit this data either directly to ELEXON or via MODIS through ELEXON modification P291, 'REMIT Inside Information Reporting Platform for GB Electricity' whilst the obligations for submission for ETR data is an obligation under the Grid Code as it requires Users to submit the data via NESO (MODIS).

The Proposer explained that the BSC documents the submission of "Inside Information Data", but again, submission of REMIT data is not a BSC obligation, as parties may submit this data via Elexon (through the Insights platform). Operating Code (OC)2.4.7 and Schedule 6 of the Data Registration Code (DRC), were introduced as part of Grid Code Modification GC0083, which specifically covered the implementation of the European Transparency Regulation (543/2013), with the REMIT obligations in existence prior to the requirements of ETR. OC2.4.7 was never intended to cover REMIT obligations.

REMIT is broader than the specific obligations under OC2.4.7. and covers other assets as well as generation and consumption units, and other categories of inside information. It also does not specify any thresholds for reporting such as the 100MW threshold in the ETR Article 7 and 15 regulations.

The Proposer confirmed that, in their opinion, there is no impact on Users regarding REMIT obligations by removing OC2.4.7, as REMIT obligations are enforced by Ofgem through

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relevant regulations and the specific clause that NESO is proposing to remove from the Grid Code was never intended to cover REMIT obligations.

Consideration of other options

Some Workgroup members stated that a further legal view was required to provide clarity on aspects of the proposed solution, in particular:

- How ETR data is considered to be different to the REMIT data under EU legislation, acknowledging the implementation of ([P291](#): REMIT inside information reporting platform and GB Electricity, [P295](#): Submission and publication of transparency regulation data via the BMRS and [GC0083](#): European transparency regulation implementation).
- Compliancy requirements under the proposed solution.

Workgroup members expressed concerns that if the ETR article 7 to 15 obligation is removed, any remaining REMIT obligation should not only cover the ETR data publication requirement for notification of availability changes, but also the obligation to publish on the GB single inside information platform (Elexon Insights), which is currently specified in OC2.4.7 for ETR but not anywhere at present as a Grid Code obligation for REMIT.

The NESO SME explained that REMIT and ETR are independent regulations, with REMIT obligations existing separately from the Grid Code. Removing ETR from the Grid Code would not affect the REMIT obligation as this is separate and would still exist in primary legislation, ensuring that the requirement to submit remit data remains intact. A Workgroup member disagreed with this view and stated that the requirement to submit REMIT data is specified in the MODIS document, therefore there is a requirement to retain the REMIT data to ensure compliancy and suggested that the MODIS document should be updated to clearly specify the data submission requirements and prevent any duplication of data.

The Workgroup members agreed that there is a need to clarify the data submission requirements to ensure that all parties understand their obligations. They discussed the importance of having clear and concise requirements to avoid confusion and ensure compliance.

Compliance with ETR and REMIT Data overlap

The NESO SME clarified that while REMIT data submission is not mandatory, most parties choose to submit it through MODIS or directly to the Elexon portal, this voluntary submission helps ensure that the data is collected and available for analysis. The SME explained that a single information platform for GB REMIT data was introduced with ETR and MODIS to centralize data submission and ensure that all necessary data is collected in one place, meaning that Parties who submit the data have the option to submit this

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through MODIS or directly to the Elexon portal. This flexibility allows parties to choose the method that works best for them while ensuring that the data is submitted as required. Workgroup members agreed that as part of this proposal, there is a need to retain the requirement for a central UK database to ensure compliance with ETR which would maintain data integrity and ensure that all parties meet their obligations.

The Proposer agreed that this should be reflected in the legal text and proposed to make an amendment to the proposed legal text to update the platform references to reflect the current data submission process.

Legal View and Legal Text

The NESO Legal representative attended a Workgroup meeting to further understand the Workgroup concerns regarding the proposed legal text. Workgroup members explained that they had concerns with the deletion of OC2.4.7 containing the ETR articles 7 to 15 obligations. A Workgroup member commented their belief was when the ETR was introduced, it was a requirement to publish data on a central database which was in Europe and believes this is still a UK requirement. It was explained that when ETR was converted to Assimilated Law most of the text remained as original with a few paragraphs being modified, deleted and added. Whilst the main data submission and publication periodicity requirements remain unchanged most of the changes related to publication platform and processes. Originally ETR introduced the common European “the Central Information Transparency Platform”, however in the new Assimilated Law all references to “the Central Information Transparency Platform” have been deleted and a new term “reporting service” introduced. The “reporting service” is defined in article 4 new paragraph 7 which states *“In this Article, “reporting service” means a service for the reporting and publication of data which is approved by the national regulatory authority for the purposes of this Article.”* Currently within GB the “reporting service” is the Elexon Insights website REMIT page and consequently all data which requires to be published by the Retained ETR Law under articles 7 to 15 (or OC.2.4.7) needs to be submitted to this webpage. Whilst originally data could only be submitted to “the Central Information Transparency Platform” via MODIS the ETR Retained Law contains options in the revised article 4 paragraph 2 which now states:

“At any time while a reporting service is in operation, in relation to data which are able to be submitted to that reporting service—

(a) primary owners of the data other than TSOs may fulfil their obligation under paragraph 1 by submitting the data to the reporting service, subject to the prior agreement of the TSO in whose control area the primary owner is located;

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(b) TSOs may fulfil their obligations in Articles 6 to 17 to publish data, and their obligations in paragraph 1A relating to such publication, by submitting the data to the reporting service.”.”

This amendment now permits Users to submit their ETR data either to NESO via MODIS who then are required to forward to Elexon, or directly to Elexon provided they have prior approval from the NESO. Given that CPI583 identified that REMIT data meets the data content requirements of ETR, users can comply by only submitting REMIT data. However, users need to note that whilst the general requirements for publishing REMIT data can be achieved by only publishing on the user’s own website, REMIT data relating to ETR requirements must be published centrally on the “reporting service” which is the Elexon Insights REMIT webpage. Other Workgroup members supported this view.

Workgroup members were also of the view that the proposed legal text referred to the primary legislation, which isn’t usual practice when implementing EU codes.

Following the legal text review and further input from Workgroup members, the Proposer updated the proposed legal text and confirmed that Workgroup members were satisfied with the amendments. It was agreed by the Proposer and Workgroup members that OC.2.4.2.3 should remain as it currently written, however an amendment to the EU Law Section is needed to ensure alignment with the new requirements. The Workgroup also concluded that concluded that the reference should remain to the European Regulation 543 as it mandates data submission. There is also a small change required to DRC schedule 6 to remove reference to the production type codes table which are used by “the Central Information Transparency Platform” as these codes not match the existing fuel codes used in REMIT which are considered suitable for GB purposes, and these are not detailed in ETR.

Workgroup Consultation Question 7: In simplifying this issue, has this created any unintended “gaps” for this or related areas of the Grid Code?

Draft legal text

The draft legal text for this change can be found in Annex 3.

What is the impact of this change?

Proposer’s assessment against Code Objectives

Proposer’s assessment against Code Objectives	
Relevant Objective	Identified impact

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(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;	Neutral
(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;	Neutral
(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	Neutral
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive The proposed changes remove obligations that are no longer required which should improve efficiencies for impacted Users and remove duplication where data is already submitted via a separate process

* See *Electricity System Operator Licence*

When will this change take place?

Implementation date

15 September 2025.

Date decision required by

A decision is required by the Grid Code Review Panel on 29 July 2025.

Implementation approach

There will be no system changes required as a result of this modification.

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Interactions

- | | | | |
|---|---|--|--------------------------------|
| <input type="checkbox"/> CUSC | <input checked="" type="checkbox"/> BSC | <input type="checkbox"/> STC | <input type="checkbox"/> SQSS |
| <input type="checkbox"/> European Network Codes | <input type="checkbox"/> EBR Article 18 T&Cs ¹ | <input type="checkbox"/> Other modifications | <input type="checkbox"/> Other |

This modification has been raised as a result of an approved BSC modification ([CPI583](#)).

How to respond

Standard Workgroup Consultation questions

1. Do you believe that the Original Proposal better facilitates the Applicable Objectives?
2. Do you support the proposed implementation approach?
3. Do you have any other comments?
4. Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?
5. Does the draft legal text satisfy the intent of the modification?
6. Do you agree with the Workgroup's assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?

Specific Workgroup Consultation questions

7. In simplifying this issue, has this created any unintended "gaps" for this or related areas of the Grid Code?

The Workgroup is seeking the views of Grid Code Users and other interested parties in relation to the issues noted in this document and specifically in response to the questions above.

Please send your response to grid.code@nationalenergyso.com using the response proforma which can be found on the [GC0174 modification page](#).

In accordance with Governance Rules if you wish to raise a Workgroup Consultation Alternative Request please fill in the form which you can find at the above link.

¹ 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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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, Workgroup or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DRC	Data Registration Code
EBR	Electricity Balancing Regulation
EMFIP	Electricity Market Fundamental Information Platform
ENTSO-E	European Network of Transmission Operators for Electricity
ETR	European Transparency Regulation
EU	European Union
GC	Grid Code
MODIS	Market Operation Data Interface System
OC	Operating Code
OTF	Operational Transparency Forum
MODIS	Market Operation Data Interface System
NESO	National Energy System Operator
REMIT	Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency
SME	Subject Matter Expert
STC	System Operator Transmission Owner Code

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SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions

Reference material

- [CPI583 Rationalising publication of European Transparency Regulation \(ETR\) data on Elexon Systems - Elexon BSC](#)

Annexes

Annex	Information
Annex 1	Proposal form
Annex 2	Terms of reference
Annex 3	Draft Legal Text
Annex 4	Self-Governance Statement