
Grid Code (GC) GC0175: Removing references to “fax” or “facsimile” within the Grid Code

Decision: The Authority¹ directs² that the proposed modification to the Grid Code be made

Target audience: The National Energy System Operator (NESO), the Grid Code Review Panel, Grid Code users and other interested parties

Date of publication: 14 March 2025

Implementation date: 10 working days after the Authority decision

Background

The NESO currently use fax machines within the 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.

The Public Switched Telephone Network (PSTN) that fax machines use, is due to be switched off by the start of 2027³ 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 via an Azure-based Designated Information Exchange System between relevant Users and the NESO has been established to ensure current interactions can continue. It should also maintain the stability and audit trail that the current fax solution provides.

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 [The UK’s PSTN network will switch off in 2027 | BT Business](#)

The Modification Proposal

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

GC0175⁴ (‘the Proposal’) was raised by the NESO on 8 October 2024. The Proposal seeks to implement changes in the following areas to the Grid Code.

- Glossary & Definitions
- Connection Conditions
- Operating Code 7
- Balancing Code 1
- Balancing Code 2
- General Conditions

The Proposer considers the Proposal positively impacts Grid Code Objectives (i)⁵ and (iii)⁶ and has a neutral impact on the remaining Objectives.

Code Administrator Consultation

The Code Administrator Consultation (CAC) ran from 29 October 2024 to 29 November 2024. This received five non-confidential responses where four respondents believed that the Proposal better facilitated Objective (i). Five respondents said the Proposal better facilitates Objective (iii) and one respondent believed the Proposal better facilitates Objective (v). Respondents were generally supportive of the Proposal, as it will improve efficiencies in communication by replacing outdated technology. One respondent queried if the new Designated Information Exchange System was intended to be captured in the definition of Critical Tools and Facilities. The NESO subsequently advised that this was not

⁴ The full legal text for this change can be found here: [GC0175: Removing references to “Fax” or “Facsimile” within the Grid Code | National Energy System Operator](#)

⁵ Applicable Grid Code Objective (i): To permit the development, maintenance, and operation of an efficient, coordinated and economical system for the transmission of electricity.

⁶ Applicable Grid Code Objective (iii): 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.

the intention, however noted that the Azure-based platform is intended to be as resilient as possible.

Two respondents highlighted typographical legal text issues in the CAC. A summary of the legal text queries and proposed changes can be found in Annex 4 of the FMR, and the provisional typographical amendments made to the legal text can be found in Annex 5 of the FMR.

Grid Code Review Panel recommendation

On 30 January 2025, the Panel recommended unanimously that the Proposer's solution is implemented.

Our decision

We have considered the issues raised by the Proposal and in the FMR dated 10 March 2025. We have considered and taken account of the responses to the CAC which are included in the FMR.⁷ We have concluded that:

- implementation of the Proposal will better facilitate the achievement of the Grid Code Objectives (i) and (iii) of the Grid Code⁸
- approving the modification is consistent with our principal objective and statutory duties⁹

Reasons for our decision

We consider the Proposal will better facilitate Grid Code Objectives (i) and (iii) with a neutral impact on the other applicable Grid Code Objectives.

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

⁷ Grid Code GC0175 Final Modification Report can be viewed on NESO's website at: [GC0175: Removing references to "Fax" or "Facsimile" within the Grid Code | National Energy System Operator](#)

⁸ As set out in Standard Condition E3 of the Electricity System Operator Licence.

⁹ The Authority's statutory duties are wider than matters which the Grid Code Panel Review must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

We agree with the Proposer that the Proposal positively impacts this Grid Code Objective. By replacing outdated technologies, this Proposal ensures efficient operation and coordination of the system for the transmission of electricity.

(iii) subject to paragraphs E3.2(b)(i) and E3.2(b)(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

We agree with the Proposer that the Proposal positively impacts this Grid Code Objective. By replacing outdated technologies, this Proposal improves security and efficiency of the electricity transmission system.

For the avoidance of doubt, we have made our assessment on this Proposal in reference to the Grid Code Objectives which came into effect upon the establishment of the NESO on 1 October 2024.

Decision notice

In accordance with Standard Condition E3 of the Electricity System Operator Licence, the Authority hereby directs that Grid Code modification proposal GC0175: Removing references to "fax" or "facsimile" within the Grid Code be made.

Gurpal Singh,
Head of Engineering and Profession Lead

Signed on behalf of the Authority and authorised for that purpose