Public

Workgroup Consultation

GC0169:

Material changes arising from Grid Code Modification GC0136

Overview:

This modification is designed to address a number of non-specialist changes identified following Grid Code Modification GC0136: Non-material changes to Grid Code following implementation of the EU Connection Codes.

Modification process & timetable

1. **Proposal Form**
   06 March 2024
2. **Workgroup Consultation**
   20 March 2025 - 10 April 2025
3. **Workgroup Report**
   16 July 2025
4. **Code Administrator Consultation**
   30 July 2025 - 30 August 2025
5. **Draft Final Modification Report**
   17 September 2025
6. **Final Modification Report**
   07 October 2025
7. **Implementation**
   10 business days after Authority decision

Have 5 minutes? Read our Executive summary
Have 60 minutes: Read the Workgroup Consultation
Have 120 minutes? Read the full Workgroup Consultation and Annexes.

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

This modification is expected to have a: Low impact on NESO, Grid Code Users, Transmission Licensees

Modification drivers: Efficiency, Governance and Transparency

Governance route	Standard Governance modification with assessment by a Workgroup	
Who can I talk to about the change?	**Proposer:** Antony Johnson antony.johnson@nationalenergyso.com	**Code Administrator Chair**: Jess Rivalland jessica.rivalland@nationalenergyso.com
How do I respond?	Send your response proforma to grid.code@nationalenergyso.com by **5pm** on **10 April 2025**	

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Executive Summary

The modification is needed to address outstanding issues identified during Grid Code modification GC0136, ensuring consistency and clarity in definitions and terms related to the Grid Code. The proposed solution includes assessing specific terms, improving certain clauses, and ensuring alignment with existing regulations.

What is the issue?

The proposed change to the Grid Code is essential for maintaining consistency and clarity, addressing unresolved issues arising from Grid Code modification GC0136.

What is the solution?

Key updates include enhancing the Glossary and Definitions for terms like Caution Notice, adjusting the definition of SHETL, and refining the requirements in OC9.6.4. Additionally, a review of the requirements in BC2.13 regarding interconnector transfer times and associated defined terms was also undertaken as part of this modification and further checks were made to ensure alignment with Engineering Recommendation G99. As part of this modification, a review of some of the paragraphs in the General Conditions was undertaken.

Implementation date: 10 business days after Authority decision

Interactions

Potential interactions between Distribution Code, Engineering Recommendation G99, and Electricity Balancing Guideline (EBR).

What is the issue?

This modification is necessary and arises from the outstanding issues identified outside the scope of Grid Code modification GC0136 (Non-material changes to Grid Code following implementation of the EU Connection Codes).

Why change?

The change is necessary to ensure consistency and clarity of the Grid Code arising from the outstanding issues identified in Grid Code modification GC0136.

What is the solution?

Proposer's solution

At a high level, the Proposers Solution aims to address the following issues:

a. Address the non-specialist issues raised following Grid Code modification GC0136. These are detailed in Annex 4 of this Workgroup Consultation and in summary include the following elements:
b. Glossary and Definition changes - Caution Notice / Consistency of SI units / Interconnector Scheduled Transfer / Intraday Cross-Zonal Gate Closure Time;
c. Glossary and Definition changes - Change the SHETL and SPT definition to that of a plc;
d. OC9.6.4 – Clarification required to OC9.6.4 based on the feedback received as part of Grid Code Modification GC0136;
e. BC2.13 – Interconnector Scheduled Transfer / Intraday Cross-Zonal Gate Closure Time / relationship with Glossary and Definitions;
f. General Conditions - Re-word Paragraph GC.5.2 and GC5.4 and confirm if clauses GC11.2 and GC15.1 can be simplified; and
g. Ensure consistency between Grid Code and G99.

As part of the solution, all of the above issues were considered and discussed by the Workgroup. A detailed summary of these issues and how they were resolved is covered in Annex 4.

One of the clauses requiring attention and as identified as part of GC0136 relates to BC2.13. The issue relates to the terms "Intraday Cross-Zonal Gate Closure Time" and

"Interconnector Scheduled Transfer" which are not defined terms in the Grid Code. The Workgroup assessed whether these should be defined terms or simply undefined but upon investigation it was revealed that these corrections had already been implemented into the Grid Code through another modification which had taken place between the conclusion of GC0136 and the baseline used to derive the GC0169 draft legal text. The Workgroup agreed that these terms (as per the current live version of the Grid Code) should remain undefined.

As part of this modification, some changes have been made to BC3.7.3(a) which removes some superfluous text to aid clarity. As this text forms part of the Balancing Code, an assessment was undertaken as part of the modification to see if there would need to be any changes to Annex GR.B of the Governance Rules and hence if there is a change to the Terms and Conditions relating to Balancing Service Providers which fall under Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195) which is not believed to the case.

One specific point worth noting, is that as part of Grid Code Modification GC0136, a Stakeholder made reference to CP.A.3.2.1 mentioning that the reference to an open loop response should be changed to a closed loop response. When the GC0169 proposal was being developed, NESO considered this to be a complex issue and as it would require specialist knowledge, and it would fall outside the scope of GC0169. The issue was referred to the NESO Technical Compliance department who addressed the matter with the Stakeholder and this was resolved and formally clarified at the Grid Code Review Panel through Action 460. It has therefore not been considered further by the GC0169 Workgroup.

Workgroup considerations

The Workgroup convened 5 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 Workgroup reached a consensus that the modification will necessitate changes to the Balancing Code 3, which will have an effect on the EBR. The Proposer confirmed that whilst the proposed changes will have an impact on the EBR no changes are needed to Annex GR.B of the Governance Rules. However, in accordance with the rules of the EBR, it is essential for the GC0169 Code Administrator Consultation to run for a minimum period of a month.

The Workgroup assessed Annex 4 - Summary of Changes post GC0136 concerning the scope of GC0169, and several points were noted. It was highlighted that the bold terms in Balancing Code (BC) 2.1.3 had already been corrected through an earlier Grid Code modification post GC0136. In addition, the issue identified in CP.A.3.2.1 of the Compliance Processes was identified as a specialist issue falling outside the Terms of Reference of GC0169 and was addressed separately through action 460 of the Grid Code Review Panel.

General Conditions (GC) 5.1 and GC5.2 has been streamlined to specify the parties to whom the obligations apply, for example Network Operators, Non-Embedded Customers, and Interconnectors, rather than listing all those it does not apply to, such as Generators and Suppliers.

A Workgroup member also raised a concern about the wording in GC 5.2 and its potential conflict with other codes: DCUSA, CUSC, and BSC. The Proposer consulted with NESO Legal to check if there are any conflicts, and they suggested there may be some consequential changes with the BSC. These are summarised as follows:

i) The only potential interaction identified is in BSC Section H, para 9.2.1(a) which relates to communications in general, but we do not believe this will necessitate a change to the BSC.

ii) In addition to the above draft legal text, BSC, Section O, para 1.2.1(c)provides that the Grid Code governs communications between NETSO and a Party in relation to Section Q of the BSC (Balancing Services Activities), but the NESO do not believe this to be an issue.

iii) Lastly, NESO also considered the Communications Requirements document under the BSC, the Proposer having discussing this issue with NESO Legal do not believe are any interactions with this section.

The above items were also discussed with Elexon and it was agreed that no changes were needed to the BSC as a consequence of this modification.

The Workgroup made proposals for enhancing clarity and readability in GC5.4, and NESO Legal expressed satisfaction with these revisions.

The Proposer indicated that both a User and NGET can propose a modification in relation to the Electrical Standards detailed in GC 11.2. The proposed draft legal text was assessed by NESO Legal, leading to a few recommended changes. NESO Legal confirmed that that GC 15.1 could be deleted as it pertains to a legacy issue.

The definition of 'Caution Notice' in the Glossary & Definitions (G&D) was discussed, with a proposal to align it with safety rules to avoid inconsistencies. Given its established role in safety rules, the prospect of removing the definition from the Grid Code was also considered. It was agreed that the definition could be updated and this has been reflected in the draft legal text.

The Workgroup concurred that the Grid Code updates should ensure alignment for SPT and SHETL in the G&D noting that both organisations are Public Limited Companies (PLCs).

As part of the GC0169 work, it was noted that there are challenges in identifying and correcting incorrect SI units throughout the Grid Code. As a result, it was suggested that only the G&D should be revised in this modification, with plans for future adjustments to address other incorrect SI units in the main body of the Grid Code. A list of those SI units referenced in the G&D and how they were updated is listed in Annex 5.

The consistency between the Grid Code and G99 was discussed, and confirmation was received that the latest version of G99 and the Grid Code align. The proposer noted that reviewing the Compliance Processes (CP).A.3.2.1 was outside the remit of GC0169 due to its requirement for specialised knowledge. This issue was addressed separately via Action 460 of the Grid Code Review Panel (GCRP) and was not discussed in the GC0169 Workgroup.

The concerns regarding Operating Code (OC) 9.6.4 were unclear, but after discussing the issue within the Workgroup and following up with the stakeholder who originally raised this point, it was agreed that no changes were needed.

The Workgroup discussed the European Connection Conditions (ECC).6.3.7.1.4 and agreed with a suggestion by one Workgroup member that some of the text could be removed as it was deemed superfluous.

In respect of the Proposer's assessment, the identified impact for Grid Code Objectives b) and c) were amended from Neutral to Positive.

The Workgroup have considered interactions between this modification and the Distribution Code G99 and do not believe there are any.

The Workgroup members discussed the costs and implementation associated with the modifications and agreed they are administrative. It was noted that there are no additional costs such as software changes or new obligations on any parties.

The Workgroup members evaluated the need for additional resources and decided that the existing members, in conjunction with NESO Legal, were adequate for the Workgroup discussions.

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 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;	**Neutral** By clarifying the Grid Code as indicated in the Proposers solution, it will improve clarity. This is marginally seen as positive overall but generally considered neutral in respect of this Grid Code objective.
(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);	**Positive** By clarifying the Grid Code as indicated in the Proposers solution, it will improve clarity. This is marginally seen as positive overall from a competition perspective but generally considered neutral in respect of this Grid Code objective.

(c) 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;	**Positive** By clarifying the Grid Code as indicated in the Proposers solution, it will improve clarity. This is marginally seen as positive overall but generally considered neutral in respect of this Grid Code objective.
(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	**Positive** As the NESO is responsible for Administration of the Grid Code, improving clarity is a key objective and therefore we see this modification as positive in respect of this Grid Code objective.
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.	**Positive** As the NESO is responsible for Administration of the Grid Code, improving clarity is a key objective and therefore we see this modification positive in respect of this Grid Code objective.

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	**Positive** This modification will improve clarity identified from the outstanding issues of Grid Code modification GC0136. Whilst not having a direct impact on improved safety and reliability of the System, it will improve clarity which we overall see as positive.
Lower bills than would otherwise be the case	**Neutral** There will be no impact to lower bills as a result of this modification.
Benefits for society as a whole	**Positive** The Grid Code is a complex document running to many pages. Any change which improves clarity to Stakeholders and User's in addition to resolving any outstanding issues from a previous Grid Code Modification (GC0136) is only seen as positive.
Reduced environmental damage	**Neutral** There will be no impact to environmental damage as a result of this modification.
Improved quality of service	**Positive** The Grid Code is a complex document running to many pages. Any change which improves clarity to Stakeholders and User's and hence the quality of service they receive is only seen as positive.

When will this change take place?

Implementation date

10 business days after Authority decision.

Date decision required by

There is no specific back stop date required for this modification. However, the Workgroup should aim to complete this modification in a timely manner. We aim to submit the Final Modification Report to Ofgem in Q4 2025.

Implementation approach

The implementation approach will seek to identify what issues can be addressed from within the expertise of the Workgroup. A number of the Workgroup have experience of Grid Code modification GC0136 and Engineering Recommendation G99. In lieu of this, this modification has been established as a combined Grid Code / Distribution Code Working Group.

Interactions

☐CUSC	☐BSC	☐STC	☐SQSS
☐European Network Codes	☒ EBR Article 18 T&Cs[1]	☐Other modifications	☒Other

Potential interactions between Distribution Code, Engineering Recommendation G99, and Electricity Balancing Guideline (EBR).

How to respond

Standard Workgroup Consultation questions

1. Do you believe that the Original Proposal better facilitates the Applicable Objectives versus the current baseline?
2. Do you support the proposed implementation approach?
3. Do you have any other comments?

[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.

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 GC0169 does impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code, but does not require a change to Annex GR.B of the Grid Code Governance rules?
7. Do you have any comments on the impact of GC0169 on the EBR Objectives?

Specific Workgroup Consultation questions

8. Do you agree there are no cross-code impacts regarding the changes to GC5.2 for DCUSA and CUSC?
9. Do you believe this modification will not have any impact on the Balancing and Settlement Code (BSC). If you do not believe this to be the case, please state your reasons why?

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 pro-forma which can be found on the GC0169 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.

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
BC	Balancing Code

BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CP	Compliance Processes
CUSC	Connection and Use of System Code
DCC	Demand Connection Code Network Code (Commission Regulation (EU) 2016/1388)
DCUSA	Distribution Connection and Use of System Agreement
GCRP	Grid Code Review Panel
EBR	Electricity Balancing Guideline
ECC	European Connection Conditions
ECP	European Compliance Processes
G99	Engineering Recommendation G99 - Requirements for the connection of generation equipment in parallel with public distribution networks on or after 27 April 2019
GC	General Conditions
G&D	Glossary & Definitions
HVDC	High Voltage DC Network Code (Commission Regulation (EU) 2016/1447)
OC	Operating Code
RfG	Requirements for Generators Network Code (Commission Regulation (EU) 2016/631)
SI Unit	International System of Units
SHETL	Scottish Hydro-Electric Transmission Limited
SHET	Scottish Hydro-Electric Transmission
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	Terms of Reference
Annex 3	Draft Legal Text
Annex 4	Summary of changes post GC0136 in scope of GC0169
Annex 5	Discussion of changes relating to SI units
Annex 6	Workgroup Consultation Response Proforma