

EU NCER: System Defence Plan

Issue 6

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EU NCER: System Defence Plan

1 Version Control

Version	Date	Author	Rationale
Issue 1	Dec 2018	NESO	By December 2018, each TSO shall notify the regulatory authority of the system defence plan designed pursuant to Article 11.
Issue 2	July 2019	NESO	Further detail added to define SGU's, outline the procedures to activate the system defence plan and updates made to the system protection schemes of Electricity Storage Modules.
Issue 3	December 2019	NESO	Updates to the SGU list and High Priority Significant Grid Users. References to SOGL added. Clarification of emergency state and clarification of treatment of storage units and low frequency demand disconnection settings against NCER. Updates to assurance and compliance testing. Updates to glossary and definitions. Updated to reflect compliance requirements for implementation of NCER by December 2019.
Issue 4	September 2023	NESO	Refresh of document to reflect Grid Code updates (GC0096, GC0125, GC0127, GC0128, GC0144, GC0147 and GC0148) and approval of SGU list, T&Cs and Test Plan.
Issue 5	March 2024	NESO	Refresh of document to reflect implementation of the Electricity System Restoration Standard (GC0156), Distributed Re-Start and Test Plan.
Issue 6	April 2025	NESO	Refresh of document's style and format.

2 Introduction

The *European Network Code on Emergency & Restoration*¹ (**EU NCER**) came into force on 18 December 2017. This document is the GB System Defence Plan prepared by the GB National Electricity Transmission System Operator.

As provided for in the EU NCER Article 11, this System Defence Plan has been designed in consultation with Stakeholders in the GB synchronous area. GB Parties who will be required to comply with the requirements of the EU NCER and this System Defence Plan are detailed in Appendix A of this document. In general, the System Defence Plan will apply to the following parties in GB.

- NESO;
- Any Party with a CUSC Contract;
- Transmission Licensees;
- Network Operators;
- Any Non-CUSC Party with a contract with NESO to provide a Defence Service.

This plan is not intended to replace any provisions currently in place in the GB industry codes nor to amend the Operational Security Limits², it is a summary of how the requirements for System Defence specified in EU NCER are satisfied in GB. All the provisions contained within this System Defence Plan are already described in the GB industry codes (e.g. Grid Code³, CUSC⁴, STC⁵, etc.) and therefore obligations specified

¹ *Network Code on Emergency and Restoration*

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2017.312.01.0054.01.ENG&toc=OJ:L:2017:312:TOC

² *Article 25 System Operations Guideline*

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2017.220.01.0001.01.ENG

³ *Grid code*

<https://dcm.nationalenergyso.com>

⁴ *Connection and Use of System Code*

<https://neso.energy/industry-information/codes/connection-and-use-system-code-cusc/cusc-code-documents>

⁵ *System Operator Transmission Owner Code*

<https://neso.energy/industry-information/codes/system-operator-transmission-owner-code-stc/stc-code-documents>

upon parties be they User's or Transmission Licensees as well as NESO will be specified in the industry codes and not this System Defence Plan. Where there are new mandatory requirements for GB Parties then these will be included in the relevant GB Codes as appropriate and subject to the full governance process. For the avoidance of doubt, the mandatory requirements placed on parties are defined in the industry codes through the industry code governance process and not through this System Defence Plan. The governance of this System Defence Plan will be managed through GC16 of the Grid Code General Conditions which provides for a governance framework similar to that of the Relevant Electrical Standards.

This System Defence Plan will be of interest to all parties identified in Appendix A of this document.

In complying with the requirements of the Grid Code, System Operator Transmission Owner Code (STC), Distribution Code and Balancing and Settlement Code (BSC) (as applicable), NESO, Transmission Licensees, Network Operators and CUSC Parties and Defence Service Providers will be satisfying the requirements of EU NCER. It should be noted that the EU NCER applies both to GB Code Users and EU Code Users as defined in Appendix A of this document.

This System Defence Plan has been developed taking the following into account:

- the operational security limits set out in accordance with Article 25 of Regulation (EU) 2017/1485 {SOGL};
- the behaviour and capabilities of load and generation within the Synchronous Area;
- the specific needs of the High Priority Significant Grid Users listed in Appendix B; and
- the characteristics of the National Electricity Transmission System and Network Operator's (DNO) systems.

This has been achieved by developing this GB System Defence Plan collaboratively with affected parties through the Energy Emergencies Executive Committee (E3C), Electricity Task Group (ETG), and by collecting feedback during public consultations. A requirement of Article 50 (3) of the EU NCER is to review the System Defence Plan at least every five years to assess its effectiveness. This process will be managed by NESO through the governance process as provided for in GC16 of the Grid Code General Conditions.

For the avoidance of doubt there is a separate document – the System Restoration Plan in respect of Restoration activities which is available [here](#).

3 System Defence Plan

3.1 Plan Overview

This System Defence Plan (SDP) is drafted to conform to *EU NCER* Articles 11 to 22. It serves as an umbrella document referencing more detailed systems and procedures.

Although the UK has departed from the EU, the majority of the requirements in the EU NCER have been retained in GB law via Statutory Instrument (SI 533 2019). Therefore, unless provided for by exception in SI 533 2019, the requirements of the EU NCER will apply unchanged.

EU NCER sits alongside the Transmission System Operation Guideline⁶ (SOGL) which sets out harmonised rules on system operation and identifies different critical system states (Normal State, Alert State, Emergency State, Blackout State and Restoration State).

This System Defence Plan consists of the technical and organisational measures necessary for the defence and resilience of the electricity system in Great Britain taking into account the capabilities of the GB parties listed in Table 1 of Appendix A of this document and the operational constraints of the Total System.

The main objectives of this plan are to describe how NESO, Transmission Licensee's, Network Operators and those parties listed in Appendix A of this document as required in the industry codes (Grid Code, System Operator Transmission Owner Code (STC) and Distribution Code have the necessary requirements in place to provide as much resilience to the System as possible to prevent a Total or Partial System shutdown.

⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1485&from=EN>

3.2 Activation of System Defence Plan Procedures

3.2.1 This System Defence Plan contains the processes and automatic actions available to NESO (as provided for in the Grid Code) to prevent the occurrence of an emergency or to manage the System when it is in an Emergency State. The System Defence Plan will become active when one or more of the conditions as provided for in *Grid Code BC2.9.8.1* occur. These conditions are consistent with those defined in Article 18(3) of the System Operator Guideline (SOGL), which defines that a Transmission System shall be in an Emergency State when operational security analysis requires activation of one of the following measures:

- A situation where there is a violation of one of more criteria as defined under the *National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS)*; or
- A situation when Unacceptable Frequency Conditions as defined under the *National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS)* have occurred; or
- At least one measure of the System Defence Plan is activated as provided for in sections 4, 5 and 6 of this document; or
- There is a failure of the computing facilities used to control and operate the Transmission System or unplanned outages of Electronic Communication and Computing Facilities as provided for in *Grid Code BC2.9.7* or the loss of communication, computing and data facilities with other Transmission Licensees as provided for in STCP 06-4.

3.2.2 Procedures in this System Defence Plan will be activated by NESO in coordination with the GB parties within the scope of the EU NCER as defined in Appendix A of this System Defence Plan.

For the avoidance of doubt, activation of one or more measures of the System Defence Plan is an action undertaken either automatically (e.g. Low Frequency Demand Disconnection) or by NESO depending upon System conditions. Instructions to User's and Transmission Licensees, when one or more measures of the System Defence Plan is to be enacted through instructions, are given through the Grid Code (for example OC7 and BC2.9) or through the STC and STC Procedures.

- 3.2.3 All instructions issued by NESO under this System Defence Plan must be executed by each User (as defined in the Grid Code) without undue delay.
- 3.2.4 NESO will coordinate affected Transmission Licensees and Externally Interconnected System Operators where these procedures have a significant cross border impact.

4 System Protection Schemes

4.1 Automatic Under Frequency Control Scheme

In Accordance with EU NCER Article 15:

- 4.1.1 Pumped Storage plant synchronised at zero generated output with the capability to rapidly increase generated output at a specified Low Frequency (LF) when armed under a commercial service.
- 4.1.2 HVDC Interconnectors – automatic ramping of HVDC Interconnectors at specified Low Frequencies when armed under a commercial service.
- 4.1.3 Demand disconnection by LF relay initiation (contracted). A commercial service that disconnects industrial load when armed.
- 4.1.4 Fast Start from standstill – Fast Start via LF relay initiation that can be contracted at any frequency between 49 and 50 Hz (*Grid Code CC6.3.14 & ECC6.3.14*).
- 4.1.5 Article 15(3) and Article 15(4) of EU NCER places requirements on Energy Storage Units acting as a load to automatically switch to generation mode during periods of low System Frequencies. This action would need to take place between

49.5Hz (the threshold associated with LFSM-U) and 48.8Hz (the threshold associated with the first stage of the Low Frequency Demand Disconnection Scheme (LFDD)). Under the EU NCER, NESO in coordination with Transmission Licensees, is required to set the time limit and active power setpoint for Energy Storage Units to switch from a mode analogous to demand to a mode analogous to generation. Under EU NCER, where the Energy Storage Unit is not capable of switching within the time limit established by NESO (in co-ordination with Transmission Licensees) it shall automatically trip when acting as a load.

- 4.1.6 In order to satisfy the requirements of Article 15(3) and 15(4) of the EU NCER, owners and operators of Electricity Storage Modules are required to satisfy the requirements of *ECC.6.3.7.2.3* of the Grid Code. This provides for a droop requirement where the plant is required to automatically transition from an import mode of operation to an export mode of operation as system frequency falls, or if the plant is unable to satisfy these requirements, subject to agreement with NESO, install low frequency relays in accordance with the requirements of *Grid Code OC6.6.6* which would require an Electricity Storage Module to trip prior to the first stage of operation of the Low Frequency Demand Disconnection Scheme. The droop characteristic makes provision for the Electricity Storage Module to operate in an export (generation) mode of operation prior to the first stage of the LFDD Scheme at 48.8Hz. This ensures that Electricity Storage Modules are providing defensive measures to the System well before customer demand is tripped.
- 4.1.7 Limited Frequency Sensitive Mode – Under frequency (LFSM-U) – EU Code Users who own and operate Type C and D Power Generating Modules connected on or after 27 April 2019 and which had concluded contracts for major Plant items on or after 17th May 2018 or HVDC System Owners who own and operate HVDC Systems or Generators who own and operate DC Connected Power Park Modules connected after 8 September 2019 or who had concluded contracts for major Plant items on or after 28 September 2018 are required to provide an automatic increase in active power at a minimum rate of 2% of output per 0.1 Hz deviation of system frequency below 49.5 Hz.

4.2 Automatic Low Frequency Demand Disconnection Scheme

In accordance with EU NCER Article 15:

- 4.2.1 The Annex of EU NCER defines the minimum requirements for Automatic Low Frequency Demand Disconnection schemes for all Synchronous Areas. This Annex is reproduced below as it appears in SI 533 2019. This requires disconnection of at least 50% of Total Load at 48Hz.

Parameter	Frequency	Measuring Unit
Demand disconnection starting mandatory level: Frequency	48.8	Hz
Demand disconnection starting mandatory level: Demand to be disconnected	5	% of the Total Load at national level
Demand disconnection final mandatory level: Frequency	48	Hz
Demand disconnection final mandatory level: Cumulative Demand to be disconnected	50	% of the Total Load at national level
Implementation range	±10	% of the Total Load at national level, for a given Frequency

Minimum number of steps to reach the final mandatory level	4	Number of steps
Maximum Demand disconnection for each step	10	% of the Total Load at national level, for a given step

4.2.2 In GB, the technical requirements for low frequency relays and disconnection of supplies at low frequency including the overall scheme settings are detailed in Appendix 5 of the Connection Conditions and European Connection Conditions. These settings are the same in both the Connection Conditions and European Connection Conditions and reproduced below in Table CC.A.5.5.1a.

Frequency Hz	% Demand disconnection for each Network Operator in Transmission Area		
	NGET	SPT	SHETL
48.8	5		
48.75	5		
48.7	10		
48.6	7.5		10
48.5	7.5	10	
48.4	7.5	10	10
48.2	7.5	10	10
48.0	5	10	10
47.8	5		
Total % Demand	60	40	40

Table CC.A.5.5.1a

4.2.3 As can be seen from Table CC.A.5.5.1, 55% of demand in England and Wales will be disconnected at 48Hz with 40% disconnected in Scottish Power's Transmission Area and 40% in Scottish Hydro Electricity's Transmission Area. In GB, the requirements of the NCER will be satisfied on the basis that demand in England and Wales is significantly greater than in Scotland. In England and Wales 55% of demand trips which would equate to approximately 52% of national demand which satisfies the EU NCER requirements.

4.2.4 In addition to the above requirements, Articles 15(5) – 15(8) of the EU NCER require consideration to be given to netted

demand. This is the principle whereby a low frequency demand disconnection relay is configured so as to minimise the disconnection of embedded generation. Under *Grid Code ECC.A.5*, which requires low frequency demand disconnection relays to have a directional component, this requirement is already an inherent capability of the scheme. For Low Frequency Demand Disconnection arrangements which fall under the requirements of Appendix 5 of the Grid Code Connection Conditions, DNOs currently configure the low frequency demand disconnection scheme to minimise, where reasonably practicable, the disconnection of power generating modules.

4.3 Automatic Over Frequency Control Scheme

In Accordance with EU NCER Article 16:

- 4.3.1 Commercial arrangements are in place to provide static High Frequency Response by ramping HVDC Interconnectors when pre-set frequency levels are reached.
- 4.3.2 High Frequency Response contracted providers of high frequency response are required to reduce active power in response to an increase in system frequency up to 50.5 Hz as agreed in an Ancillary Services Contract. Above 50.5 Hz this is to be at a minimum rate of 2% of output per 0.1 Hz deviation of frequency above 50.5 Hz (*Grid Code BC3.7.1*).
- 4.3.3 Limited Frequency Sensitive Mode (LFSM) – existing connections (until 27 April 2019):

Limited Frequency Sensitive Mode – Over frequency (LFSM-O)
– new connections (after 27 April 2019):

In both cases the Generating Unit or Power Generating Module is required to provide an automatic reduction in active power export at a minimum rate of 2% of output per 0.1 Hz deviation of system frequency above 50.4 Hz.

- 4.3.4 If after all such measures have been taken, *Grid Code OC6B* and *OC7.4.8.8 – OC7.4.8.11* provides for NESO to issue instructions to Network Operators to disconnect Embedded Generation in order to curtail rising system frequency.

4.4 Automatic Schemes Against Voltage Collapse

In Accordance with EU NCER Article 17:

- 4.4.1 The fundamental basis of NESO's voltage control policy is to operate within the voltage limits defined in the *National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS)* in planning and operational timescales across all transmission and customer interface voltage levels. This is achieved by maintaining dynamic reactive power reserves, both leading and lagging, to further ensure operation within limits for defined contingencies.
- 4.4.2 System studies are performed in all planning and operational timescales to ensure that pre and post fault voltage levels are maintained within levels stated in the *NETS SQSS* and that voltage collapse is avoided both for transient and permanent transmission system faults.
- 4.4.3 The National Electricity Transmission System is designed to use Delayed Auto Reclose systems (DAR) to re-energise overhead line circuits following transient and semi-permanent faults, thus minimising the threat of voltage collapse.
- 4.4.4 The National Electricity Transmission System is designed to use Reactive Control Equipment to control transmission system and customer interface voltage levels both pre and post fault. Mechanically Switched Capacitors (MSCs) and Shunt Reactors have been installed at strategic locations to achieve this. Automatic Reactive Control Schemes (ARS) have also been installed to react to changes in transmission system or customer interface voltage levels and automatically switch in/out Mechanically Switched Capacitors/Shunt Reactors accordingly.
- 4.4.5 Static VAr Compensators (SVCs) are used to provide fast acting reactive power response to Transmission System voltage changes. SVCs are connected to either the 400 kV or 275 kV system and can be set to operate in target voltage or constant reactive modes.
- 4.4.6 There are other geographically specific defence measures which use individual automatic schemes to cater for specific faults. For example, the Anglo-Scottish Auto-Close Scheme (ASACS).

- 4.4.7 A co-ordinated Low Voltage Demand Disconnection Scheme is not implemented across the GB Synchronous Area. However, in a few specific areas, low voltage demand disconnection schemes have been installed to protect specific geographical areas.
- 4.4.8 The measures described above, including the regular security assessment, ensure that there is no need to install on-load tap changer blocking schemes.

5 System Defence Plan Procedures

5.1 Frequency Deviation Management Procedure

In Accordance with EU NCER Article 18:

- 5.1.1 The frequency limits of the National Electricity Transmission System are set by the System Operations Guideline (SOGL) Article 127, the Electricity Safety, Quality and Continuity Regulations (ESQCR)⁷ and the NETS SQSS. As such, and under Normal State, the frequency across the National Electricity Transmission System is maintained within the Standard Frequency range of 50 \pm 0.2 Hz to ensure operation within the Maximum Steady State Frequency Deviation of \pm 0.5 Hz.
- 5.1.2 System Frequency across the GB Synchronous Area is controlled by response from contracted generation, demand side and owners and operators of electricity storage modules.
- 5.1.3 Historically sufficient Frequency Containment Reserves (FCR) are held to ensure that frequency:
- remains within the Standard Frequency range (50 \pm 0.2 Hz) for infeed losses of < 300 MW;
 - remains within the Maximum Steady State Frequency Deviation (\pm 0.5 Hz) for infeed losses of < 1000 MW; and
 - deviation does not exceed the Maximum Instantaneous Frequency Deviation of 0.8 Hz for the maximum credible infeed loss on the system at any time.

Following the 9th August 2019 incident, these figures were reviewed and are now reflected in the Frequency Risk Control Report (FRCR) which aims to set the frequency limits in a more transparent way and against the background of magnitude, duration and likelihood. The report will be reviewed at least annually with further information being provided via the following link:-

⁷ <http://www.legislation.gov.uk/uksi/2002/2665/contents/made>

<https://neso.energy/industry-information/codes/security-and-quality-supply-standard-sqss/frequency-risk-and-control-report-frcr>

As part of the findings of the FRCR and to manage risks on the Transmission System, increasing use has been made of Dynamic Containment which is a commercial service available from providers to increase their Active Power output in response to a frequency deviation within 1 second of its inception.

- 5.1.4 Frequency Restoration Reserves (FRR) are provided by Generating Units/Power Generating Modules (including stationary Generating Units and/or Power Generating Modules such as open cycle gas turbines which can be started quickly), storage and demand side providers. Sufficient reserves are held to enable system frequency to be returned within the Maximum Steady State Frequency Deviation within 1 minute and to within the Standard Frequency Limit within 15 minutes.
- 5.1.5 The system frequency is monitored on a second by second basis by NESO. Frequency response services required for any period are calculated at the day ahead stage (i.e. one day before the real operational timeframe) based on demand characteristics, economics, largest infeed/offtake criteria, volume of variable renewable energy sources and system inertia.
- 5.1.6 Frequency Restoration Reserves (FRR) availability is continually assessed by NESO on a long-term basis. Required FRR holding for any period is calculated from week-1 and based on demand characteristics (including seasonal variations), economics, historic plant loss statistics and volume of variable renewable energy sources.
- 5.1.7 Where insufficient frequency Restoration Reserve provision by the market is forecast, then Balancing Mechanism (BM) Start-Up contracts with long notice BM Units are enacted to ensure that sufficient reserves will be available.
- 5.1.8 Should the frequency fall unexpectedly outside the Maximum Steady State Frequency Deviation limits, then automatic under/over frequency control schemes and/or Low Frequency Demand Disconnection schemes operate.
- 5.1.9 *Grid Code BC2.5.4* states that in the event of the system frequency being below 49.7Hz or above 50.3Hz, BM Participants

must not commence any reasonably avoidable action to regulate the input or output of any BM Unit in a manner that could cause the system frequency to deviate further from 50 Hz without first using reasonable endeavours to discuss the proposed actions with NESO. In addition, and in order to provide further system robustness, Electricity Storage Modules under Article 15(3) are required to automatically de-load from an import mode of operation to an export mode of operation. Where an Electricity Storage Module is not capable of satisfying this requirement, blocks of demand are required to be tripped once the System Frequency falls below 49.5Hz. These requirements are provided for in *Grid Code ECC.6.3.7.2.3*.

5.2 Additional Demand Disconnection Following Low Frequency Demand Disconnection

In Accordance with EU NCER Article 22:

- 5.2.1 If, because of a low frequency event, demand has been disconnected by automatic Low Frequency Demand Disconnection relays, NESO may instruct reduction of transmission-connected demand and/or Network Operators to disconnect additional demand in accordance with *Grid Code OC6* to recover system frequency to within the frequency restoration range and restore frequency containment reserves.

5.3 Demand Restoration

In Accordance with EU NCER Article 18:

- 5.3.1 Following a demand disconnection event, Network Operators and/or transmission-connected demand customers can reconnect demand only on instruction from NESO in accordance with *Grid Code OC6*.

5.4 Voltage Deviation Management Procedure

In Accordance with EU NCER Article 19:

- 5.4.1 NESO is obliged to plan and operate the National Electricity Transmission System within the voltage limits defined in the System Operations Guideline Article 27 and Annex II *and the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS)* at connection points. This is achieved by maintaining dynamic reactive power reserves, held on generating plant and reactive compensation equipment, to control pre and post fault voltage levels.
- 5.4.2 Voltage limits used for system design are more stringent than those used for operational planning, which in turn are more stringent than those allowed in operational timescales. This reduces the risk of breaching voltage standards in operational timescales.
- 5.4.3 Studies are undertaken by NESO using offline modelling of voltages pre-fault and following a list of credible contingencies from long-term planning down to 4 hours ahead. These studies identify any potential breach of voltage standards so that remedial action can be taken pre-fault or planned for post fault implementation. These studies are repeated following any significant change in system conditions.
- 5.4.4 Emphasis is placed by NESO control engineers on the timely management of all aspects of voltage control with varying generation and demand patterns, including switching of Reactive Compensation Equipment, setting target voltages on Static VAr Compensators, switching out designated circuits and instructing generator plant to import/export reactive power, to achieve the required target voltage levels.
- 5.4.5 A real-time assessment tool monitors power system conditions and continually re-evaluates voltages following a list of credible contingencies so that action can be taken pre-fault to avoid post fault breach of voltage standards.
- 5.4.6 In operational timescales, the following measures can be taken by NESO to maintain reactive power reserves:
- Switching of Reactive Compensation Equipment;
 - Changing the excitation of synchronous machines by issuing reactive power instructions to generators;
 - Changing reactive power flow at customer interface points, including super grid transformer tap changing;
 - Repositioning generating plant, including at part load;

- Operation of gas turbines in synchronous compensation mode;
- Synchronising additional generation, including gas turbines;
- Switching out high reactive gain circuits;
- Simultaneous generator transformer tap changing;
- Transferring demand out of a group to mitigate local issues;
- Restoration of circuit outages;
- Pre-fault demand reduction actions;
- Post fault demand reduction actions; and
- Manually disconnecting load.

5.4.7 Automatic Tap Change Control (ATCC) schemes are installed on super grid transformers to assist in maintaining a desired voltage profile at the interface points to customers connected to the National Electricity Transmission System. The voltage profile must be maintained with varying generation and demand patterns and the target voltage for individual schemes can be set by NESO to meet the requirements of Network Operators.

5.4.8 Should voltages unexpectedly exceed standards following a system event then one or more of the above measures can be used to restore voltages to within standards.

5.5 Power Flow Management Procedure

In Accordance with EU NCER Article 20:

5.5.1 Power flows across the National Electricity Transmission System are managed by NESO operating within derived transmission constraint boundaries. These constraints are dependent on transmission asset outage conditions and are optimised by NESO. Operating within transmission constraint limits may require NESO to instruct balancing actions of Balancing Service Providers; eg Bid Offer Acceptances (BOAs). In addition, NESO has several bespoke actions available to assist with the power flow management on the National Electricity Transmission System.

5.5.2 *Emergency Instructions* can be used to decrease/increase power exported/imported from the GB Total System Users

(including disconnection), as detailed in the *Grid Code BC2.9*, for example, instructions issued to Network Operators to take appropriate action on their networks or instructions issued by NESO through *Grid Code OC6B* and *OC7* requiring Network Operators to require tripping of Embedded Generation to control high frequencies. In the case of HVDC Interconnectors, an Emergency Instruction can also be a reversal of flow – leading to an effective increase in generation or demand on part of the National Electricity Transmission System on the basis that the Transmission System on the remote end of the Interconnector has the capability to do so without placing it at risk.

- 5.5.3 *Special Actions*, as defined in the *Grid Code BC1.7*, are bespoke and bilaterally agreed between NESO and specific National Electricity Transmission System Users. These are agreed in advance so that they can be implemented swiftly on instruction by NESO following a specified credible event.
- 5.5.4 Generator Operational Tripping Schemes are installed to prevent circuit thermal overloads, voltage excursions and/or system instability problems in post-fault timescales, or to protect consumer demand and/or Network Operator's systems against the loss of the generator/super grid system connections or islanding of generation.
- 5.5.5 Demand Tripping Schemes are installed to protect circuits from thermal overloads and/or maintain voltage stability under fault conditions.
- 5.5.6 Whenever downward regulation shortfall for a transmission constraint is identified (hours ahead to real time) an Insufficient Localised Negative Reserve Active Power Margin (NRAPM) warning will be issued by NESO under *Grid Code BC1.5.5* to see if any increase in generator flexibility is possible.

5.6 Assistance for Active Power Procedure

In Accordance with EU NCER Article 21:

- 5.6.1 Agreements are in place with neighbouring Transmission Licensees and Externally Interconnected System Operators (EISOs) to provide Emergency Assistance. The contracted service is for blocks of energy to be provided across HVDC Interconnectors for specific periods of time, and detailed in the

relevant *Balancing and Ancillary Services Agreement* for each interconnector or as required under *Grid Code BC.2.9. 6*.

- 5.6.2 Where a *Maximum Generation Service Agreement* is in place between NESO and a Generator (*CUSC Section 4.2*), the Generator will use reasonable endeavours to make available and provide Maximum Generation from each of its Maximum Generation BM Unit(s). NESO will request the Maximum Generation Service prior to the instruction of any measures related to Demand Control. This will be via Emergency Instructions.
- 5.6.3 Under the EU NCER, NESO shall be entitled to request assistance for active power from a CUSC Party which does not already provide a balancing service. For the avoidance of doubt this would not extend to an Embedded Power Station unless the owner of that Power Station (i.e. the Generator) had a CUSC Contract with NESO.
- 5.6.4 Whenever national downward regulation shortfall is identified (day ahead to real time) an Insufficient System Negative Reserve Active Power Margin (NRAPM) warning will be issued by NESO under *Grid Code BC1.5.5* to see if any increase in generator flexibility is possible.

5.7 National Electricity Transmission System Warnings Procedure

- 5.7.1 The *Grid Code OC6*, *OC7*, and *BC1* provide for circumstances in which NESO may issue a National Electricity Transmission System Warning to all industry participants in circumstances where Demand Reduction may be required. National Electricity Transmission System Warnings consist of the following types: –
 - (a) *Electricity Margin Notice*;
 - (b) *High Risk of Demand Reduction*;
 - (c) *Demand Control Imminent*;
 - (d) *Risk of System Disturbance*;
 - (e) *National Electricity Transmission System Warnings Table* – Appendix 1 of *OC7*; and

(f) *Other System Alerts and warnings as detailed in Grid Code OC7.4.8.15.*

5.7.2 *Electricity Margin Notice and/or High Risk of Demand Reduction* warnings may be issued by NESO when insufficient system margins are anticipated for any period.

5.7.3 Should the system conditions not return within the acceptable limits or there is still further concern, a *Demand Control Imminent* warning may be issued giving warning that NESO expects to issue a Demand Control instruction to Network Operators and/or Non-Embedded Customers in the next 30-minute window.

5.7.4 NESO will issue the above instructions when the need for Demand Control is identified in advance but this may not be possible in all circumstances. However, an increased level of Demand Control must be made available if a *High Risk of Demand Reduction* warning has been issued by 16:00 hours day 1.

5.7.5 NESO can issue the following National Electricity Transmission System Warnings at times when there is more generation than demand in order to minimise the risk of high system frequencies on both a regional and national basis

(a) *National Electricity Transmission System Warning – System NRAPM;*

(b) *National Electricity Transmission System Warning – Localised NRAPM;*

(c) *National Electricity Transmission System Warning – High Risk of Embedded Generation Reduction; and*

(d) *National Electricity Transmission System Warning – Embedded Generation Control Imminent warnings.*

5.7.6 In addition NESO can issue the following Other System Alerts and Warnings on the BMRS System which are summarised in Appendix 2 of OC7.

(a) *Demand Control by Demand Disconnection instructed by NESO;*

(b) *Demand Control by voltage reduction instructed by NESO;*

(c) *Automatic Low Frequency Demand Disconnection;*

- (d) *Demand Control (including voltage reduction and demand disconnection) - Network Operator activated;*
- (e) *Grid Code Emergency Instruction (to Network Operator);*
- (f) *Grid Code Emergency Instruction (to Generators & Demand – BCA, BEGA, & BELLA);*
- (g) *Grid Code Emergency Instruction (to Interconnectors);*
- (h) *System NRAPM;*
- (i) *Localised NRAPM;*
- (j) *Cancellation of National Electricity System Warnings;*
- (k) *STC Emergency Instruction to Transmission Owner;*
- (l) *ESEC Implementation;*
- (m) *EMR Capacity Market Notifications; and*
- (n) *Emergency Assistance Requests.*

5.8 Manual Demand Disconnection Procedure

In Accordance with EU NCER Article 22:

- 5.8.1 *Grid Code OC6, OC7, BC1, and BC2 allow Demand Control instructions to be issued by NESO to all Network Operators (including DNOs, IDNOs) and Non-Embedded Customers connected to the National Electricity Transmission System.*
- 5.8.2 *Manual Demand Reduction* in respect of Network Operators and Non-Embedded Customers may be instructed by NESO to avoid unacceptable operating conditions on the National Electricity Transmission System during periods of generation shortage, or in the event of unacceptable thermal overloading and/or unacceptable voltage conditions. There are 2 types:
 - (a) *Demand Control.* This shall be achieved by NESO instructing voltage reduction and/or demand disconnection equally across Non-Embedded Customers and Grid Supply Points.

(b) *Emergency Manual Demand Disconnection*. This applies to a localised section of the National Electricity Transmission System under an emergency and shall be achieved by NESO instructing demand disconnection at specific Grid Supply Point(s).

- 5.8.3 *Grid Code OC6.5* describes the stages of netted Demand Reduction. Network Operators shall be able to achieve the first 20% of netted demand reduction always with or without warning. Further stages of netted demand reduction (5% steps) up to a total of 40% shall be achievable following the issue of a “*National Electricity Transmission System Warning – High Risk of Demand Reduction*” by NESO before 16:00 hours day-1.
- 5.8.4 Once netted Demand Reduction has been applied, each Network Operator must ensure that their netted Demand Reduction remains at the instructed level until NESO instructs otherwise.
- 5.8.5 Whilst netted Demand Reduction is in place, the Balancing Mechanism will still be in operation and the markets will not be suspended. Demand Reduction instructions shall be issued by NESO as *Emergency Instructions*.

5.9 Manual Generation Disconnection

- 5.9.1 In the event that there is insufficient demand and a surplus of generation, there are a number of methods available to NESO to balance the system. These include:
- Bidding generation down through the balancing mechanism through the use of BM Unit Bid Offer Acceptances;
 - Ensuring sufficient negative reserve active power margin, as provided for in *Grid Code BC2.9.4*; and
 - Instructing Network Operators to curtail the export of embedded generation output (where those embedded generators do not have a CUSC contract) as provided for in *Grid Code OC6B* and *OC7*.

5.10 Rota Load Disconnection Procedure

- 5.10.1 *Rota Load Disconnections* are described in the *Electricity Supply Emergency Code*⁸. In an electricity supply emergency, it may be necessary to restrict customers' consumption of electricity by the issue of directions under the *Energy Act 1976* or the *Electricity Act 1989* requiring rota disconnections and associated restrictions.
- 5.10.2 If the DESNZ Emergency Response Team decides that rota disconnections must be introduced, the Secretary of State for the Department for Energy Security and Net Zero (DESNZ) will implement the emergency powers in the *Energy Act 1976*. DESNZ can then issue a direction to all Network Operators affected to implement a schedule of rota disconnections across their licence area(s) throughout the period of the emergency. Under this direction and within the provisions of the *Grid Code*, NESO will determine the level of disconnections required and instruct Network Operators accordingly.
- 5.10.3 Under the *Electricity Supply Emergency Code* customers vital to national infrastructure are entitled to apply to DESNZ for Protected status. Network Operators are obliged to review the Protected Site List every 2 years and provide an update to DESNZ by 1st October of the review year.

6 Assurance & Compliance Testing

- 6.1 EU NCER Article 43 states the general principles for compliance testing. Articles 44 to 49 describe the testing requirements and these are summarised below for User's and Defence Service Providers in respect of defensive measures.
- 6.2 In accordance with Article 43(2) of the EU NCER NESO has prepared a Test Plan which details how compliance and compliance testing is assessed against the EU NCER.
- 6.3 Demand Response Providers who deliver a demand response service to NESO shall execute a demand response test after 2

⁸ *Electricity Supply Emergency Code*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698739/2018_03_29_Electricity_Supply_Emergency_Code_ESEC_2018_Revision_V1.0-.pdf

consecutive unsuccessful responses in real operation, or at least every year as provided for in *DRSCII.7* of the Grid Code.

- 6.4 User's and Non-Embedded Customers who deliver a low frequency demand disconnection service, shall execute regular low frequency demand disconnection tests in accordance with *Grid Code CC/ECC.A.5.4*.
- 6.5 Transmission Licensees, Network Operators and Non-Embedded Customers in coordination with NESO shall execute regular testing on Low Frequency Demand Disconnection relays implemented on their installations as provided for in *Grid Code CC/ECC.A.5.4*.
- 6.6 NESO, Transmission Licensees, Network Operators and CUSC Parties shall test their communication systems at least every year as provided for in *Grid Code CC/ECC.6.5.4.4*.
- 6.7 NESO, Transmission Licensees, Network Operators and CUSC Parties shall test the backup power supplies of their communication systems at least every 5 years as provided for in *Grid Code CC/ECC.6.5.4.4*.
- 6.8 NESO and Transmission Licensees shall test the capability of main and backup power sources to supply its main and backup control rooms at least every year.
- 6.9 NESO and Transmission Licensees shall test the transfer procedure for moving from the main control room to the backup control room at least every year. For Transmission Licensees these requirements are provided for in STCP-06-4 (Contingency Arrangements).
- 6.10 NESO and User's shall ensure their systems are capable of handling the large volumes of data that would be expected to occur during emergency circumstances such as loss of significant volumes of demand.

7 Plan Implementation

Article 12 of the *EU NCER*, provides for the implementation of the System Defence Plan, NESO shall notify all those parties defined in Appendix A of this System Defence Plan of their obligations.

8 Plan Review

EU NCER Article 50 requires NESO to review the System Defence Plan to assess its effectiveness at least every five years.

The review will consider at least:

- (a) The development of the National Electricity Transmission System;
- (b) The capabilities of new equipment installed on the Transmission and Distribution Systems;
- (c) The GB parties commissioned since the last review, their capabilities and services offered;
- (d) The results of the tests carried out as defined in Section 7;
- (e) The analysis of system incidents; and
- (f) The operational data collected during normal operation and after disturbance.
- (g) The recommendations arising from the latest iteration of the Frequency Risk Control Report (FRCR) which is to be reviewed at least every year.

NESO will also review the relevant measures of the System Defence Plan in advance of a substantial change to the configuration of the National Electricity Transmission System. These measures and how they are assessed are covered in the Test Plan. The governance and modification process for the System Defence Plan, System Restoration Plan and Test Plan are detailed in section GC16 of the Grid Code.

Appendix A: GB Parties within the scope of the System Defence Plan

In accordance with EU NCER, Art 2 defines the SGU's who fall within the scope of the European Emergency and Restoration Code. Table A1 defines the EU Criteria and how this translates to GB Parties including which of those parties are included within the scope of the EU Emergency and Restoration Code and those which are not.

Table A1 details which Parties within GB would fall within the scope of EU NCER.

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
Existing and new Power Generating modules classified as Type C and D in accordance with the criteria set out in Article 5 of Commission Regulation (EU) 2016/631.	New	Any Generator who is an EU Code User who has a CUSC Contract with NESO and owns or operates a Type C or Type D Power Generating Module.	Applicable <i>Grid Code</i> requirements: <i>ECC.6.1.2, ECC.6.1.4, ECC.6.2.2.2, ECC.6.3, ECC.6.5, ECC.7.9, ECC.8, ECC.A.3, ECC.A.4, ECC.A.6, ECC.A.7, ECC.A.8 ECP.A.3, ECP.A.5, ECP.A.6 OC5.4, OC5.5 OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators), OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only) OC10 OC12 BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
			<p><i>BC2 (in particular BC.2.9)</i> <i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7,</i> In satisfying the above Grid Code requirements, Generators with a CUSC Contract who own or operate a Type C or Type D Power Generating Module would meet one or more of the requirements of the System Defence Plan.</p>
		Any Generator who does not have a CUSC Contract (i.e. Embedded) and owns or operates a Power Station comprising one or more Type C or Type D Power Generating Modules.	Not applicable unless that Generator has a contract with NESO to provide a Defence Service.

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
	Existing	Any Generator who is a GB Code User who has a CUSC Contract with NESO and owns or operates a Power Station comprising one or more Generating Units or Power Park Modules which i) have a maximum output of greater than 10MW but less than 50MW and connected below 110kV (equivalent to a Type C Power Generating Module) or ii) connected at 110kV or above or has a rated power output of 50MW or above (equivalent to a Type D Power Generating Module).	<p><i>CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.2.2, CC.6.3, CC.6.5, CC.7.9, CC.8, CC.A.3, CC.A.4, CC.A.6, CC.A.7</i></p> <p><i>CP.A.3</i></p> <p><i>OC5.4, OC5.5, OC5.A.1, OC.5.A.2, OC5.A.3</i></p> <p><i>OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators),</i></p> <p><i>OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only)</i></p> <p><i>OC10</i></p> <p><i>OC12</i></p> <p><i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i></p> <p><i>BC2 (in particular BC.2.9)</i></p> <p><i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7,</i></p> <p>In satisfying the above Grid Code requirements, Generators with a CUSC Contract would meet one or more of the requirements of the System Defence Plan.</p>
		Any Generator who does not have a CUSC Contract (ie Embedded) and owns or operates a Power Station comprising one or more Generating Units or Power Park Modules which i) have a maximum output of greater than 10MW but less than 50MW and connected below 110kV (equivalent to a Type C Power Generating Module) or ii) connected at 110kV or above	Not applicable unless that Generator has a contract with NESO to provide a Defence Service.

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
		or has a rated power output of 50MW or above (equivalent to a Type D Power Generating Module).	
Existing and new power generating modules classified as Type B in accordance with the criteria set out in Article 5 of Regulation (EU) 2016/631, where they are identified as SGU's in accordance with Article 11(4).	New	Any Generator who is an EU Code User and has a CUSC Contract with NESO and owns or operates a Type B Power Generating Module.	<p>Applicable Grid Code requirements: <i>ECC.6.1.2, ECC.6.1.4, ECC.6.2.2.2, ECC.6.3, ECC.6.4.3, ECC.6.5, ECC.7.9, ECC.8, ECC.A.3, ECC.A.4, ECC.A.6, ECC.A.7, ECC.A.8 ECP.A.3, ECP.A.5, ECP.A.6</i> <i>OC5.4, OC5.5, OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators), OC.7.4, OC7.6 (OC7.6 - Scotland and Offshore only)</i> <i>OC10</i> <i>OC12</i> <i>BC1.4, BC1.5, BC1.7, BC1.A.1, BC1.A.2.1</i> <i>BC2 (in particular BC.2.9)</i> <i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7,</i> In satisfying the above Grid Code requirements, Generators with a CUSC Contract who own or operate a Type B Power Generating Module would meet one or more of the requirements of the System Defence Plan.</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
		Any Generator who does not have a CUSC Contract (i.e. Embedded) and owns or operates a Power Station comprising one or more Type B Power Generating Modules.	Not applicable unless that Generator has a contract with NESO to provide a Defence Service.
	Existing	Any Generator who is a GB Code User who has a CUSC Contract with NESO and owns or operates a Power Station comprising one or more Generating Units or Power Park Modules which has a maximum output of greater than 1MW but less than 10MW and connected below 110kV (equivalent to a Type B Power Generating Module).	<p>Applicable Grid Code requirements:</p> <p><i>CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.2.2, CC.6.3, CC.6.5, CC.7.9, CC.8, CC.A.3, CC.A.4, CC.A.6, CC.A.7</i></p> <p><i>CP.A.3</i></p> <p><i>OC5.4, OC5.5, OC.5.A.1, OC.5.A.2, OC5.A.3</i></p> <p><i>OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators),</i></p> <p><i>OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only)</i></p> <p><i>OC10</i></p> <p><i>OC12</i></p> <p><i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i></p> <p><i>BC2 (in particular BC.2.9)</i></p> <p><i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7,</i></p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
			In satisfying the above Grid Code requirements, Generators with a CUSC Contract would meet one or more of the requirements of the System Defence Plan.
		Any Generator who does not have a CUSC Contract (i.e. Embedded) and owns or operates a Power Station comprising one or more Generating Units or Power Park Modules which have a maximum output of greater than 1MW but less than 10MW and connected below 110kV (equivalent to a Type B Power Generating Module).	Not applicable unless that Generator has a contract with NESO to provide a Defence Service.
Existing and new Transmission-connected	New	Any Non-Embedded Customer who is an EU Code User and who has a CUSC Contract with NESO. The requirement of the	Applicable Grid Code requirements: <i>ECC6.1.2, ECC.6.1.4, ECC.6.2.3, ECC.6.4.3, ECC.6.5, ECC.7.9,</i>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
demand facilities.		DRSC would also apply but only when the Demand Response Provider is also a CUSC Party.	<p><i>ECC.A.5.</i> <i>DRSC</i> <i>ECP.A.8</i> <i>OC1</i> <i>OC5.4, OC5.5.4 (only in respect of CUSC Parties who are also Demand Response Providers).</i> <i>OC6.3, OC.6.5, OC6.6.6, OC6.8</i> <i>OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only)</i> <i>OC10</i> <i>OC12</i> <i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i> <i>BC2 (in particular BC.2.9)</i></p> <p>In satisfying the above Grid Code requirements, Non-Embedded Customers would meet one or more of the requirements of the System Defence Plan.</p> <p>All Transmission Connected Demand Facilities would have to be BM and CUSC Parties and hence satisfy the requirements of the Emergency and Restoration Code. There is no concept of an Embedded Non-Embedded Customer.</p>
	Existing	Any Non-Embedded Customer who is a GB Code User and has a CUSC Contract with NESO.	<p>Applicable Grid Code requirements: <i>CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.3, CC.6.4.3, CC.6.5, CC.7.9,</i></p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
			<p>CC.A.5. OC1 OC5.4, OC5.5.4 (only in respect of CUSC Parties who are also Demand Response Providers). OC6.3, OC.6.5, OC6.6.6, OC6.8 OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only) OC10 OC12 BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1 BC2 (in particular BC.2.9)</p> <p>In satisfying the above Grid Code requirements, Non-Embedded Customers would meet one or more of the requirements of the System Defence Plan.</p> <p>All Transmission Connected Demand Facilities would have to be BM and CUSC Parties and hence satisfy the requirements of the Emergency and Restoration Code. There is no concept of an Embedded Non-Embedded Customer.</p>
Existing and new Transmission Connected Closed	New	Any Non-Embedded Customer who is an EU Code User and who has a CUSC Contract with NESO.	<p>Applicable Grid Code requirements: ECC6.1.2, ECC.6.1.4, ECC.6.2.3, ECC.6.4.3, ECC.6.5, ECC.7.9, ECC.A.5. DRSC</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
Distribution Systems.			<p><i>ECP.A.8</i> <i>OC1</i> <i>OC5.4, OC5.5.4 (only in respect of CUSC Parties who are also Demand Response Providers).</i> <i>OC6.3, OC.6.5, OC6.6.6, OC6.8</i> <i>OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only)</i> <i>OC10</i> <i>OC12</i> <i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i> <i>BC2 (in particular BC.2.9)</i> <i>BC3</i></p> <p>In satisfying the above Grid Code requirements, Non-Embedded Customers (which would include a Closed Distribution System), would meet one or more of the requirements of the System Defence Plan.</p> <p>All Transmission Connected Closed Distribution Systems would have to be BM and CUSC Parties and hence satisfy the requirements of the Emergency and Restoration Code. There is no concept of a Transmission Connected Non CUSC Party.</p>
	Existing	Any Non-Embedded Customer who is a GB Code User and which has a CUSC Contract with NESO.	<p>Applicable Grid Code requirements: <i>CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.3, CC.6.4.3, CC.6.5, CC.7.9,</i></p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
			<p>CC.A.5. OC1 OC5.4, OC5.5.4 (only in respect of CUSC Parties who are also Demand Response Providers). OC6.3, OC.6.5, OC6.6.6, OC6.8 OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only) OC10 OC12 BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1 BC2 (in particular BC.2.9)</p> <p>In satisfying the above Grid Code requirements, Non-Embedded Customers would meet one or more of the requirements of the System Defence Plan.</p> <p>All Transmission Connected Demand Facilities would have to be BM and CUSC Parties (which would include Closed Distribution Systems) and hence satisfy the requirements of the Emergency and Restoration Code. There is no concept of an Embedded Non-Embedded Customer.</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
Providers of redispatching of power generating modules or demand facilities by means of aggregation and providers of active power reserve in accordance with Title 8 of Regulation 2017/1485.	New & Existing	BM Participants including Virtual Lead Parties.	<p><i>(ECC/CC 6.5 ECC/CC.7.9 only)</i></p> <p>DRSC if they are also providing Demand Response Services and their equipment was purchased on or after 7 September 2018 and connected to the System on or after 18 August 2019.</p> <p><i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i></p> <p><i>BC2 (in particular BC.2.9)</i></p> <p><i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7 (As applicable but biased towards Generator who are registered as Gensets).</i></p>
Existing and new high voltage direct current (HVDC) Systems and direct current connected	New	HVDC System Owners and Generators in respect of Transmission DC Converters and/or DC Connected Power Park Modules who are EU Code Users and have a CUSC Contract with NESO.	<p>Applicable Grid Code requirements:</p> <p><i>ECC6.1.2, ECC.6.1.4, ECC.6.2.2.2, ECC.6.3, ECC.6.5, ECC.7.9,</i></p> <p><i>ECC.8, ECC.A.3, ECC.A.4, ECC.A.6, ECC.A.7, ECC.A.8</i></p> <p><i>ECP.A.3, ECP.A.7</i></p> <p><i>OC5.4, OC5.5</i></p> <p><i>OC.7.4, OC7.6 (OC7.6 - Scotland and Offshore only)</i></p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
Power Park Modules in accordance with the criteria set out in Article 4(1) of commission Regulation (EU) 2016/1447.			OC10 OC12 BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1 BC2 (in particular BC.2.9) BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7, In satisfying the above Grid Code requirements, HVDC System Owners with a CUSC Contract who own or operate an HVDC System. DC Power Park Modules would need to satisfy the same Grid Code requirements as those applicable to new Type C and Type D Power Generating Modules listed in the first row of this table.
		Any HVDC System Owner who does not have a CUSC Contract would not be required to satisfy the requirements of the EU Emergency and Restoration Code.	Not applicable unless that HVDC System Owner has a contract with NESO to provide a Defence Service.
	Existing	DC Converter Station Owners and Generators in respect of Transmission DC Converters who are GB Code Users and have a CUSC Contract with NESO.	Applicable Grid Code requirements: CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.2.2, CC.6.3, CC.6.5, CC.7.9, CC.8, CC.A.3, ECC.A.4, CC.A.6, CC.A.7, CC.A.8 CP.A.3 OC5.4, OC5.5, OC5.A.4 OC.7.4, OC7.6 (OC7.6 - Scotland and Offshore only)

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
			<p>OC10 OC12 BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1 BC2 (in particular BC.2.9) BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7,</p> <p>In satisfying the above Grid Code requirements, DC Converter Station Owners with a CUSC Contract who own or operate a DC Converter Station would be required to satisfy the requirements of EU NCER. DC Power Park Modules would need to satisfy the same Grid Code requirements as those applicable to Existing Generators listed in the second row of this table.</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
Existing and new Type A Power Generating Modules in accordance with the criteria set out in Article 5 of Regulation (EU) 2016/631, to existing and new Type B Power Generating Modules other than those referred to in paragraph 2(b), as well as to existing and new demand facilities, closed distribution systems and third parties	New	<p>Any Generator who is an EU Code User and has a CUSC Contract with NESO and owns or operates a Type A Power Generating Module.</p> <p>Non-Embedded Customers and BM Participants in respect of Closed Distribution Systems and Aggregators.</p>	<p>Applicable Grid Code requirements: <i>ECC6.1.2, ECC.6.1.4, ECC.6.2.2.2, ECC.6.3, ECC.6.5, ECC.7.9, ECC.8, ECC.A.3, ECC.A.4, ECC.A.6, ECC.A.7, ECC.A.8</i> <i>DRSC if they are also providing Demand Response Services and their equipment was purchased on or after 7 September 2019 and connected to the System on or after 18 August 2019.</i> <i>ECP.A.3, ECP.A.5, ECP.A.6</i> <i>OC5.4, OC5.5</i> <i>OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators),</i> <i>OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only)</i> <i>OC10</i> <i>OC12</i> <i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i> <i>BC2 (in particular BC.2.9)</i> <i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7,</i> In satisfying the above Grid Code requirements, Generators with a CUSC Contract who own or operate a Power Station comprising a Type A Power Generating Module would meet one or more of the requirements of the System Defence Plan in the same</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
<p>providing demand response where they qualify as defence service providers pursuant to Article 4(4).</p>			<p>way as a Generator who owns or operates a Type B Power Generating Module. Note that a Generator in respect of a Type A Power Generating Module will have to meet those requirements of the Grid Code as applicable to Type A Power Generating Modules. However, where a Generator in respect of a Small Power Station comprises Type A Power Generating Modules, then the requirements on Small Power Stations are less onerous than those of Large Power Stations but this does not exclude those specific requirements applicable to Type A Power Generating Modules. The requirements will also vary if the Type A Power Generating Module is Embedded or Directly Connected.</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
		Any Generator who does not have a CUSC Contract (i.e. Embedded) and owns or operates a Power Station comprising one or more Type A Power Generating Modules.	Not applicable unless that Generator has a contract with NESO to provide a Defence Service.
Existing and new Type A Power Generating Modules in accordance with the criteria set out in Article 5 of Regulation (EU) 2016/631, to existing and new Type B Power Generating Modules other than those referred to in paragraph 2(b), as well as to existing and new demand facilities, closed	Existing	<p>Any Generator who is a GB Code User who has a CUSC Contract with NESO and owns or operates a Power Station comprising one or more Generating Units or Power Park Modules which has a maximum output of greater than 400W but less than 1MW and connected below 110kV (equivalent to a Type A Power Generating Module).</p> <p>Non-Embedded Customers and BM Participants in respect of Closed Distribution Systems and Aggregators.</p>	<p>Applicable Grid Code requirements: CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.2.2, CC.6.3, CC.6.5, CC.7.9, CC.8, CC.A.3, CC.A.4, CC.A.6, CC.A.7 <i>DRSC if they are also providing Demand Response Services and their equipment was purchased on or after 7 September 2019 and connected to the System on or after 18 August 2019.</i> CP.A.3 OC5.4, OC5.5, OC5.A.1, OC.5.A.2, OC5.A.3. OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators), OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only) OC10 OC12 BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1 BC2 (in particular BC.2.9) BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7, In satisfying the above Grid Code requirements, Generators with a CUSC Contract who own or operate</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
distribution systems and third parties providing demand response where they qualify as defence service providers pursuant to Article 4(4).			a Power Station comprising a Type A Power Generating Module would meet one or more of the requirements of the System Defence Plan in the same way as a Generator who owns or operates a Type B Power Generating Module. Note that a Generator in respect of a Type A Power Generating Module will have to meet those requirements of the Grid Code as applicable to Type A Power Generating Modules. However, where a Generator in respect of a Small Power Station comprises Type A Power Generating Modules, then the requirements on Small Power Stations are less onerous than those of Large Power Stations but this does not exclude those specific requirements applicable to Type A Power Generating Modules. The requirements will also vary if the Type A Power Generating Module is Embedded or Directly Connected.
		Any Generator who does not have a CUSC Contract (i.e. Embedded) and owns or operates a Power Station comprising one or more Generating Units or Power Park Modules which have a maximum output of greater than 400W but less than	Not applicable unless the Generator in respect of that Power Station has a contract with NESO to provide a Defence Service.

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
		1MW and connected below 110kV (equivalent to a Type A Power Generating Module).	
Type A and Type B Power Generating Modules referred to in paragraph 3, demand facilities and closed distribution systems providing demand response may fulfil the requirements of this Regulation either directly or indirectly	New and Existing	BM Participants including Virtual Lead Parties.	<i>ECC.6.5, ECC.7.9, BC1, BC2,</i>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
through a third party under the terms and conditions set out in accordance with Article 4(4).			
This Regulation shall apply to energy storage units of a SGU, a defence service provider or	New	Any EU Code Generator which has a CUSC Contract with NESO and which owns and operates Electricity Storage Modules would be classified as a Storage User as defined under the GC0096 Grid Code proposals.	Applicable Grid Code requirements: ECC6.1.2, ECC.6.1.4, ECC.6.2.2.2, ECC.6.3, ECC.6.5, ECC.7.9, ECC.8, ECC.A.3, ECC.A.4, ECC.A.6, ECC.A.7 ECP.A.3, ECP.A.5, ECP.A.6 OC5.4, OC5.5

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
restoration service provider which can be used to balance the system, provided that they are identified as such in the system defence plans restoration plans or service contract.			<p>OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators), OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only) OC10 OC12 BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1 BC2 (in particular BC.2.9) BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7, , Electricity Storage Modules are treated in the same way as Power Generating Modules. Generators who have a CUSC Contract with NESO who own and/or operate Electricity Storage Modules would therefore be within the scope of NCER.</p>
	Existing	Any CUSC Party who owns or operates Storage plant	<p>Applicable Grid Code requirements: CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.2.2, CC.6.3, CC.6.5, CC.7.9, CC.8, CC.A.3, CC.A.4, CC.A.6, CC.A.7 CP.A.3 OC5.4, OC5.5, OC5.A.1, OC.5.A.2, OC5.A.3. OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators), OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only) OC10</p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
			<p><i>OC12</i> <i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i> <i>BC2 (in particular BC.2.9)</i> <i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7,</i></p>
Defence Service Provider with a legal contract to provide a defence service.	New	Any non CUSC party which has a contract with NESO is to provide a Defence Service would need to satisfy the appropriate requirements of the Grid Code through a contractual mechanism.	<p>Applicable Grid Code requirements as defined contractually: <i>ECC6.1.2, ECC.6.1.4, ECC.6.2.2.2, ECC.6.3, ECC.6.5, ECC.7.9, ECC.7.10, ECC.7.11</i> <i>ECC.8, ECC.A.3, ECC.A.4, ECC.A.6, ECC.A.7</i> <i>ECP.A.3, ECP.A.5, ECP.A.6</i> <i>OC5.4, OC5.5</i> <i>OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators),</i> <i>OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only)</i> <i>OC10</i> <i>OC12</i> <i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i> <i>BC2 (in particular BC.2.9)</i> <i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7.</i></p>

EU Criteria	New or Existing	List of GB Parties considered to be SGUs for purposes of the System Defence Plan (GB SGU's)	Measures of the System Defence Plan
Defence Service Provider with a legal contract to provide a defence service.	Existing	Any non CUSC party which is to provide a defence service would need to satisfy the appropriate requirements of the Grid Code through a contractual mechanism.	<p>Applicable Grid Code requirements as defined contractually:</p> <p><i>CC6.1.2, CC.6.1.3, CC.6.1.4, CC.6.2.2.2, CC.6.3, CC.6.5, CC.7.9, CC.8, CC.A.3, CC.A.4, CC.A.6, CC.A.7</i></p> <p><i>CP.A.3</i></p> <p><i>OC5.4, OC5.5, OC5.A.1, OC.5.A.2, OC5.A.3.</i></p> <p><i>OC6.1.6, OC6.6.6* (*Note OC6.6.6 applies only to Pumped Storage Generators),</i></p> <p><i>OC.7.4, OC7.6 (OC7.6 – Scotland and Offshore only)</i></p> <p><i>OC10</i></p> <p><i>OC12</i></p> <p><i>BC1.4, BC1.5, BC.1.7, BC1.A.1, BC1.A.2.1</i></p> <p><i>BC2 (in particular BC.2.9)</i></p> <p><i>BC3.3, BC3.4, BC3.5, BC.3.6, BC.3.7.</i></p>

GB parties falling within the remit of the EU NCER.

In GB, those parties who fall under the requirements of the EU NCER are:-

- CUSC Parties; and
- Non-CUSC Parties who have a contractual agreement with NESO to provide one or more measures of this System Defence Plan.

The Connection and Use of System Code

The Connection and Use of System Code (CUSC) defines the arrangements for parties connecting to or using the Transmission System including but not limited to, issues such as connection, charging, Mandatory Ancillary Services and Balancing Services.

It is a mandatory requirement for any party (such as a Generator, HVDC System Owner, Network Operator, Non-Embedded Customer, Aggregator) which: -

- Is directly connected to the Transmission System;
- Owns or operates a Large Power Station (a Large Power Station is defined in the Grid Code);
- Owns or operates an HVDC System and whose Connection Point is at 110kV or above;
- Owns or operates a DC Converter Station and the Installation has a rating of 50MW or more;
- Applies for Transmission Entry Capacity;
- Is a Licensed Supplier;
- Participates in the Balancing Mechanism; or
- Owns or operates a Large Power Station and that Large Power Station comprises one or more Electricity Storage Modules.

To accede to the CUSC and have an agreement with NESO. A condition of signing the CUSC will necessitate the need for that Party to also meet the applicable requirements of the Grid Code. In satisfying the requirements of the Grid Code, any one of these parties will satisfy the requirements of EU NCER.

Network Operators fall under the requirements of the EU NCER as the Regulation (as defined in Article 2(1)) applies directly to them.

A non-CUSC Party would only be required to satisfy the requirements of the EU NCER where that party has a formal binding contract with NESO to provide one or more measures of the System Defence Plan.

Non-CUSC Parties

A non-CUSC Party would include one of the following categories, unless that Party has opted to sign the CUSC:

- A Generator who owns or operates a Licence Exempt Embedded Medium Power Station (LEEMPS);
- A Generator who owns or operates an Embedded Small Power Station;
- A Demand Response Provider who may have a commercial contract with NESO to provide Commercial Ancillary Services but has not signed the CUSC;
- A HVDC System Owner who owns and operates an HVDC System and that HVDC System is Embedded and has a Connection Point below 110kV and has not signed the CUSC;
- A DC Converter Station Owner who owns and operates a DC Converter Station and that DC Converter Station is not connected to the Transmission System and has a rating of less than 50MW and has not signed the CUSC; or
- A Generator who owns or operates an Electricity Storage Module and that Electricity Storage Module is part of an Embedded Medium Power Station or Embedded Small Power Station and that Generator has not signed the CUSC.

For the avoidance of doubt, a Non-CUSC Party would not be bound by the requirements of the EU NCER unless that Non-CUSC Party has a contract with NESO to provide a Defence Service.

Appendix B: High Priority Significant Grid User list

Within GB, a High Priority Significant Grid User is classified as:

- A Large Power Station connected directly to the National Electricity Transmission System; or
- An Embedded Large Power Station.

For the purposes of this Appendix, Embedded and Large Power Station have the same definition as that defined in the Grid Code

Appendix C: List of Network Operators

A list of Network Operators is available from Ofgem's website which is available from the following link.

https://www.ofgem.gov.uk/system/files/docs/2019/08/electricity_registered_or_service_addresses_new.pdf

Appendix D: Glossary

These definitions have been sourced from the Electricity Transmission Licence, the Grid Code Glossary and Definitions, the Network Code Emergency and Restoration and the European Union Emissions Trading Scheme website.

Balancing Mechanism	As defined in the Glossary and Definitions of the Grid Code.
DESNZ	His Majesty's Government Department for Energy Security and Net Zero.
BM Participant	As defined in the Glossary and Definitions of the Grid Code.
CUSC Contract	As defined in the Glossary and Definitions of the Grid Code.
Defence Service	A capability as detailed in this System Defence Plan as required from a CUSC Party, as a condition of that party meeting the requirements of the Grid Code or a capability provided by a party which has a contract with NESO to provide a Defence Service. A Defence Service is one or more capabilities detailed in this System Defence Plan.
Defence Service Provider	As defined in the Glossary and Definitions of the Grid Code.
EU Code User	As defined in the Glossary and Definitions of the Grid Code.
EU Generator	As defined in the Glossary and Definitions of the Grid Code.
European Regulation (EU) 2016/631	Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a Network Code on Requirements of Generators
European Regulation (EU) 2016/1388	Commission Regulation (EU) 2016/1388 of 17 August 2016 establishing a Network Code on Demand Connection

European Regulation (EU) 2016/1447	Commission Regulation (EU) 2016/1447 of 26 August 2016 establishing a network code on requirements for Grid Connection of High Voltage Direct Current Systems and Direct Current-connected Power Park Modules
European Regulation (EU) 2017/1485	Commission Regulation (EU) 2017/1485 establishing a guideline on electricity transmission system operation
European Regulation (EU) 2017/2195	Commission Regulation (EU) 2017/2195 of 17 December 2017 establishing a guideline on electricity balancing
GB Code User	As defined in the Glossary and Definitions of the Grid Code.
GB Generator	As defined in the Glossary and Definitions of the Grid Code.
GB Synchronous Area	As defined in the Glossary and Definitions of the Grid Code.
Generating Unit	As defined in the Glossary and Definitions of the Grid Code.
Genset	As defined in the Glossary and Definitions of the Grid Code.
HVDC System	As defined in the Glossary and Definitions of the Grid Code.
NESO	The National Energy System Operator is responsible for operating the Onshore Transmission System and, where owned by Offshore Transmission Licensees, Offshore Transmission Systems. The System Operator for Great Britain is currently National Energy System Operator.
National Electricity Transmission System Security	The National Electricity Transmission System Security and Quality of Supply Standard as published on NESO's Website:

and Quality of Supply Standards or NETS SQSS	https://neso.energy/industry-information/codes/security-and-quality-supply-standard-sqss/sqss-code-documents
Non-Embedded Customer	As defined in the Glossary and Definitions of the Grid Code.
Offshore Generating Unit	As defined in the Glossary and Definitions of the Grid Code.
Onshore Generating Unit	As defined in the Glossary and Definitions of the Grid Code.
Power Generating Module	As defined in the Glossary and Definitions of the Grid Code.
Storage User	As defined in the Glossary and Definitions of the Grid Code.
System Operator Transmission Owner Code or STC	The System Operator Transmission Owner Code as published on NESO's Website: https://neso.energy/industry-information/codes/system-operator-transmission-owner-code-stc/stc-code-documents
Total System	As defined in the Glossary and Definitions of the Grid Code.
TSO	A Transmission System Operator is a natural or legal person responsible for operating, ensuring the maintenance of and, if necessary, developing the transmission system in each area and, where applicable, its interconnections with other systems, and for ensuring the long-term ability of the system to meet reasonable demands for the transmission of electricity.
Type A Power Generating Module	As defined in the Glossary and Definitions of the Grid Code.

Type B Power Generating Module	As defined in the Glossary and Definitions of the Grid Code.
Type C Power Generating Module	As defined in the Glossary and Definitions of the Grid Code.
Type D Power Generating Module	As defined in the Glossary and Definitions of the Grid Code.
Unacceptable Frequency Conditions	As defined in the Terms and Definitions of the Security and Quality of Supply Standard

Appendix E: Total Load and Netted Demand Definitions

The ENTSOE System Operations Committee has defined **Total Load** as the sum of all generation on both transmission and distribution systems (active power measured or estimated) and any imports, deducting power used for energy storage (e.g. pumps), house load of power plants and any exports.

Total Load = Σ generation (gross) + imports - exports - energy storage - house load

(noting that energy storage could be a positive or negative value)

If part of the generation is unknown/unavailable (e.g. distributed generation) to the system operator (NESO or Network Operators), the value must be estimated.

Netted Demand is defined as the netted value of active power seen from a given point of the system, computed as (load – generation – storage consumption), at a given instant or averaged over any designated interval of time.

Appendix F: Energy Storage Units

Energy Storage Units within the scope of the requirements of EU NCER are defined in Table A1 of Appendix A.

National Energy System Operator
Faraday House
Gallows Hill
Warwick
CV34 6DA

nationalenergyso.com

