

#### **Annex 4 – GC0175 Summary of Code Administrator Consultation Legal Text Queries**

Legal text changes within the text are highlighted in yellow in the table below for ease in comparison.

At the Grid Code Review Panel on 30 January 2025, the Panel agreed to the following legal text amendments:

- Proposed changes highlighted in blue were determined by the Panel to be minor. Under GR.22.4(iii), the Panel and the Proposer agreed these changes were minor and instructed the Code Administrator to make the changes.
- Changes highlighted in green were determined by the Panel to be typographical; under GR.22.4(i), the Panel instructed the Code Administrator to make the changes.
- Proposed changes not highlighted were deemed to not be required.

Proposed changes	Text consulted on at Code Administrator Consultation	Proposed Changes
<p><b>Glossary and Definitions – Designated Information Exchange System</b></p> <p>Change from Control Room to Trading Point or Control Point, to cover Generator requirements under CC.6.5.9.</p> <p>Restructuring of definition with same content included</p>	<p><u>A facsimile machine or an <b>Electronic Communication Platform</b>, as agreed between each <b>User</b> with respect to their <b>Control Centre</b> or Control Room and <b>The Company</b>, that facilitates the exchange of information between a <b>User</b> and <b>The Company</b>.</u></p>	<p><u>A facsimile machine or, as agreed between each <b>User</b> with respect to their <b>Control Centre</b>, <b>Trading Point</b> or <b>Control Point</b> and <b>The Company</b>, an <b>Electronic Communication Platform</b> that facilitates the exchange of information between a <b>User</b> and <b>The Company</b>.</u></p>
<p><b>CC.5.2.1 (l)</b></p> <p>After Designated Information Exchange System: removal of additional space, reinstatement of 'a' within 'as', unbolding of 'as'.</p> <p>Deletion of additional 'in' before CC.6.5.9.</p>	<p><u>confirmation of access to the <b>Designated Information Exchange System</b> <del>as list of the telephone numbers for the <b>Users</b> facsimile machines referred to</del> referenced <b>in</b> in CC.6.5.9; and</u></p>	<p><u>confirmation of access to the <b>Designated Information Exchange System</b> <del>as list of the telephone numbers for the <b>Users</b> facsimile machines referred to</del> referenced in CC.6.5.9; and</u></p>
<p><b>CC.6.5.9</b></p> <p>Unbold 'and' within 'Plant and Apparatus'</p>	<p><u>Facsimile Machines</u></p> <p>CC.6.5.9 Each <b>GB Code User</b> and <b>The Company</b> shall provide a facsimile machine or machines:</p>	<p><u>Facsimile Machines <b>and Electronic Communication Platform</b></u></p> <p>CC.6.5.9 Each <b>GB Code User</b> and <b>The Company</b> shall provide a facsimile machine or machines:</p>

<p>Deletion of space before 'Electronic Communication Platform' subheading</p> <p>Rephrasing of first paragraph under 'Electronic Communication Platform' including correction of references from 'GB Grid Code User' to 'GB Code User' and unbolding of comma after first reference to GB Code User</p> <p>Minor changes in (a)</p> <p>Remove 'The Company and' in (b) as the obligation is not on The Company. Change 'the' to 'their' in (b) and (c). Bolding of a bracket.</p> <p>Bold 'C' within 'Control Point' in (c) and make plural</p> <p>Change of wording from 'will' to 'shall' within last paragraph</p> <p>Add full stop at end of clause</p> <p>Formatting of font colour to black</p>	<div data-bbox="792 193 1330 528"> <ul style="list-style-type: none"> <li>(a) in the case of <b>GB Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at its <b>Trading Point</b>;</li> <li>(b) in the case of <b>The Company</b> and <b>Network Operators</b>, at the <b>Control Centre(s)</b>; and</li> <li>(c) in the case of <b>Non-Embedded Customers</b> and <b>DC Converter Station</b> owners at the <b>Control Point</b>.</li> </ul> </div> <p>Each <b>GB Code User</b> shall notify, prior to connection to the <b>System</b> of the <b>GB Code User's Plant and Apparatus</b>, <b>The Company</b> of its or their telephone number or numbers, and will notify <b>The Company</b> of any changes. Prior to connection to the <b>System</b> of the <b>GB Code User's Plant and Apparatus</b>, <b>The Company</b> shall notify each <b>GB Code User</b> of the telephone number or numbers of its facsimile machine or machines and will notify any changes.</p> <p><u><b>Electronic Communication Platform</b></u></p> <p><u>On a date agreed between <b>The Company</b> and <b>GB Grid Code User</b>, <b>The Company</b> shall provide the <b>Electronic Communication Platform</b> which will be accessible to each registered <b>GB Code User</b>. Each <b>GB User</b> shall provide access facilities at the following locations:</u></p> <div data-bbox="604 1070 1330 1302"> <ul style="list-style-type: none"> <li><u>(a) in the case of <b>GB Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at its <b>Trading Point</b>;</u></li> <li><u>(b) in the case of <b>The Company</b> and <b>Network Operators</b>, at the <b>Control Centre(s)</b>; and</u></li> <li><u>(c) in the case of <b>Non-Embedded Customers</b> and <b>DC Converter Station</b> owners at the <b>Control Point</b>.</u></li> </ul> </div> <p><u>The <b>GB Code User</b> will ensure the facilities required to access the <b>Electronic Communication Platform</b> are maintained at</u></p>	<div data-bbox="1541 193 2087 528"> <ul style="list-style-type: none"> <li>(a) in the case of <b>GB Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at its <b>Trading Point</b>;</li> <li>(b) in the case of <b>The Company</b> and <b>Network Operators</b>, at the <b>Control Centre(s)</b>; and</li> <li>(c) in the case of <b>Non-Embedded Customers</b> and <b>DC Converter Station</b> owners at the <b>Control Point</b>.</li> </ul> </div> <p>Each <b>GB Code User</b> and <b>The Company</b> shall provide a facsimile machine or machines:</p> <div data-bbox="1352 632 2087 863"> <ul style="list-style-type: none"> <li>(a) in the case of <b>GB Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at its <b>Trading Point</b>;</li> <li>(b) in the case of <b>The Company</b> and <b>Network Operators</b>, at the <b>Control Centre(s)</b>; and</li> <li>(c) in the case of <b>Non-Embedded Customers</b> and <b>DC Converter Station</b> owners at the <b>Control Point</b>.</li> </ul> </div> <p>Each <b>GB Code User</b> shall notify, prior to connection to the <b>System</b> of the <b>GB Code User's Plant and Apparatus</b>, <b>The Company</b> of its or their telephone number or numbers, and will notify <b>The Company</b> of any changes. Prior to connection to the <b>System</b> of the <b>GB Code User's Plant and Apparatus</b>, <b>The Company</b> shall notify each <b>GB Code User</b> of the telephone number or numbers of its facsimile machine or machines and will notify any changes.</p> <p><u>On a date agreed between <b>The Company</b> and a <b>GB Code User</b>, <b>The Company</b> shall provide an <b>Electronic Communication Platform</b> accessible to that <b>GB Code User</b> and that <b>GB Code User</b> shall provide access facilities at the following locations:</u></p> <p><u>(a) in the case of <b>GB Generators</b>, at the <b>Control Point</b> of each</u></p>
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Move 'Electronic Communication Platform' into subheading at top of C.6.5.9	all times	<p><b>Power Station</b> and at <b>their Trading Point(s)</b>;</p> <p>(b) in the case of <b>Network Operators</b>, at their <b>Control Centre(s)</b>; and</p> <p>(c) in the case of <b>Non-Embedded Customers</b> and <b>DC Converter Station</b> owners at their <b>Control Point(s)</b>.</p> <p>The <b>GB Code User</b> shall ensure the facilities required to access the <b>Electronic Communication Platform</b> are maintained at all times.</p>
<p>ECC.5.2.1 (l)</p> <p>Addition of 'in' before ECC.6.5.9</p> <p>Removal of additional space</p>	<p>confirmation of access to the <b>Designated Information Exchange System</b> as <del>a list of the telephone numbers for the Users</del> <u>facsimile machines referred to in</u> <u>referenced</u> ECC.6.5.9; and</p>	<p>confirmation of access to the <b>Designated Information Exchange System</b> as <del>a list of the telephone numbers for the Users</del> <u>facsimile machines referred to in</u> <u>referenced in</u> ECC.6.5.9; and</p>
<p>ECC.6.5.9</p> <p>Amendments in line with suggested changes to CC.6.5.9 including unbolding of comma after first reference to EU Code User</p> <p>Rephrasing of first paragraph under 'Electronic Communication Platform'</p> <p>Remove 'The Company and' in (b) as the obligation is not on The Company.</p>	<p><u>Facsimile Machines</u></p> <p>ECC.6.5.9 Each <b>User</b> and <b>The Company</b> shall provide a facsimile machine or machines:</p> <p>(a) in the case of <b>Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at its <b>Trading Point</b>;</p> <p>(b) in the case of <b>The Company</b> and <b>Network Operators</b>, at the <b>Control Centre(s)</b>; and</p> <p>(c) in the case of <b>Non-Embedded Customers</b> and <b>HVDC Equipment</b> owners at the <b>Control Point</b>.</p>	<p><u>Facsimile Machines</u> and <u>Electronic Communication Platform</u></p> <p>ECC.6.5.9 Each <b>User</b> and <b>The Company</b> shall provide a facsimile machine or machines:</p> <p>(a) in the case of <b>Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at its <b>Trading Point</b>;</p> <p>(b) in the case of <b>The Company</b> and <b>Network Operators</b>, at the <b>Control Centre(s)</b>; and</p> <p>(c) in the case of <b>Non-Embedded Customers</b> and <b>HVDC Equipment</b> owners at the <b>Control Point</b>.</p>

<p>Additional changes to refer to 'EU Code User' and 'EU Generators' rather than 'GB Code User' and 'GB Generators'</p> <p>Move 'Electronic Communication Platform' into subheading at top of C.6.5.9</p>	<p>Each <b>User</b> shall notify, prior to connection to the <b>System</b> of the <b>User's Plant and Apparatus</b>, <b>The Company</b> of its or their telephone number or numbers, and will notify <b>The Company</b> of any changes. Prior to connection to the <b>System</b> of the <b>User's Plant and Apparatus</b> <b>The Company</b> shall notify each <b>User</b> of the telephone number or numbers of its facsimile machine or machines and will notify any changes.</p> <p><u><b>Electronic Communication Platform</b></u></p> <p><u>On a date agreed between <b>The Company</b> and <b>GB Grid Code User</b>, <b>The Company</b> shall provide the <b>Electronic Communication Platform</b> which will be accessible to each registered <b>GB Code User</b>. Each <b>GB User</b> shall provide access facilities at the following locations:</u></p> <p><u>(a) in the case of <b>GB Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at its <b>Trading Point</b>;</u></p> <p><u>(b) in the case of <b>The Company</b> and <b>Network Operators</b>, at the <b>Control Centre(s)</b>; and</u></p> <p><u>(c) in the case of <b>Non-Embedded Customers</b> and <b>DC Converter Station</b> owners at the <b>Control Point</b>.</u></p> <p><u>The <b>GB Code User</b> will ensure the facilities required to access the <b>Electronic Communication Platform</b> are maintained at all times</u></p>	<p>Each <b>User</b> shall notify, prior to connection to the <b>System</b> of the <b>User's Plant and Apparatus</b>, <b>The Company</b> of its or their telephone number or numbers, and will notify <b>The Company</b> of any changes. Prior to connection to the <b>System</b> of the <b>User's Plant and Apparatus</b>, <b>The Company</b> shall notify each <b>User</b> of the telephone number or numbers of its facsimile machine or machines and will notify any changes.</p> <p><u>On a date agreed between <b>The Company</b> and an <b>EU Code User</b>, <b>The Company</b> shall provide an <b>Electronic Communication Platform</b> accessible to that <b>EU Code User</b> and that <b>EU Code User</b> shall provide access facilities at the following locations:</u></p> <p><u>(a) in the case of <b>EU Generators</b>, at the <b>Control Point</b> of each <b>Power Station</b> and at <b>their Trading Point(s)</b>;</u></p> <p><u>(b) in the case of <b>Network Operators</b>, at their <b>Control Centre(s)</b>; and</u></p> <p><u>(c) in the case of <b>Non-Embedded Customers</b> and <b>DC Converter Station</b> owners at their <b>Control Point(s)</b>.</u></p> <p><u>The <b>EU Code User</b> shall ensure the facilities required to access the <b>Electronic Communication Platform</b> are maintained at all times.</u></p>
<p><b>Operating Code 7 – Appendix 1</b></p> <p>Bolding of defined term 'Designated Exchanged System' in four instances within the table</p>	<p>Please see table within legal text in Annex 2</p>	<p>Please see table within legal text in Annex 5</p>

Additional space added after '/' in two instances between Designated Information Exchange System/Telephone, to ensure Telephone is on one line, for ease of reading		
<b>BC2.A.3.2 (a)</b> Addition of a space after 'GC6' Reinstatement of space after Designated Information Exchange System Rephrasing to make it clear that the intent is to share all information in the Annexure except from specific fax related data	The <del>fax must be transmitted</del> submission should be submitted to <b>The Company</b> (to the relevant location in accordance with GC6) <u>via the Designated Information Exchange System</u> and must contain all the sections from the relevant part of Annexure 1 and from either Annexure 2 or 3 (as applicable) but with only the data changes set out. The "notification time" must be completed to refer to the time of <u>submission to the Designated Information Exchange System</u> <del>transmission</del> , where the time is expressed as London time.	The <del>fax must be transmitted</del> submission should be submitted to <b>The Company</b> (to the relevant location in accordance with GC6) <u>via the Designated Information Exchange System</u> and must contain all <del>the sections from the</del> relevant <del>part of information from</del> Annexure 1 and from either Annexure 2 or 3 (as applicable) but with only the data changes set out. The "notification time" must be completed to refer to the time of <u>submission to the Designated Information Exchange System</u> <del>transmission</del> , where the time is expressed as London time.
<b>BC2.A.4.2 (b)</b> Change from 'notification' to 'submission' for consistency	Upon receipt of the acknowledging <del>fax</del> <u>submission</u> , the <b>User</b> will, if requested re- <del>transmit</del> <u>submit</u> the whole or the relevant part of the <del>fax</del> <u>notification</u> .	Upon receipt of the acknowledging <del>fax</del> <u>submission</u> , the <b>User</b> will, if requested re- <del>transmit</del> <u>submit</u> the whole or the relevant part of the <del>fax</del> <u>submission</u> .
<b>BC.1.4.1 (a)</b>	Submission of <b>BM Unit Data</b> and <b>Generating Unit Data</b> by <b>Users</b> to <b>The Company</b> specified in BC1.4.2 to BC1.4.4 (with the exception of BC1.4.2(f)) is to be by use of electronic data communications facilities, as provided for in CC.6.5.8 or ECC.6.5.8 (as applicable). However, data specified in BC1.4.2(c) and BC1.4.2(e) only, may be submitted by telephone or <u>via the Designated Information Exchange System</u> <del>fax</del> .	Query from respondent: Is it the intent that immediately post implementation Generators can't provide this information via Fax? I thought that the intent was to have a phased implementation.  NESO has advised that no change is required to the consulted legal text as the phased implementation is covered under the

BC2.6.1 (f)	Submissions of revised MVAR capability may be made <del>by</del> <u>via</u> <u>the Designated Information Exchange System</u> <del>facsimile transmission</del> , using the format given in Appendix 3 to BC2.	definition of Designated Exchange System: 'A facsimile machine or an Electronic Communication Platform...'
BC2.6.1 (h)	Submissions of revised availability of <b>Frequency Sensitive Mode</b> may be made <u>via the Designated Information Exchange System</u> <del>by facsimile transmission</del> , using the format given in Appendix 4 to BC2. This process should only be used for technical restrictions to the availability of <b>Frequency Sensitive Mode</b> .	
BC2.A.3.2	The following provisions apply to <del>faxed</del> -submission of revised MVAR data <u>submitted via the Designated Information Exchange System</u> :	