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Workgroup Consultation Response Proforma

GC0169: Material changes arising from Grid Code Modification GC0136

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to grid.code@nationalenergygyso.com by **5pm on 10 April 2025**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Jess Rivalland jessica.rivalland@nationalenergygyso.com or grid.code@nationalenergygyso.com

| Respondent details | Please enter your details | |
|--|--|--|
| Respondent name: | Antony Johnson | |
| Company name: | National Energy System Operator | |
| Email address: | Antony.Johnson@nationalenergygyso.com | |
| Phone number: | 07966 734856 | |
| Which best describes your organisation? | <input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other |

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (*this will be shared with industry and the Panel for further consideration*)

☐ **Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration*)

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For reference the Applicable Grid Code Objectives are:

- a) *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- b) *Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);*
- c) *Subject to sub-paragraphs E3.2(b)(i) and E3.2(b)(ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;*
- d) *To efficiently discharge the obligations imposed upon the licensee by this license* and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and*
- e) *To promote efficiency in the implementation and administration of the Grid Code arrangements*

* See Electricity System Operator Licence

For reference, (for consultation questions 6 & 7) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:

- a) *fostering effective competition, non-discrimination and transparency in balancing markets;*
- b) *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
- c) *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
- d) *contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
- e) *ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
- f) *facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*

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- g) *facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

What is the EBR?

The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.

The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe's security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the ESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem.

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions

| | | |
|---|--|---|
| 1 | Do you believe that the Original Proposal better facilitate the Applicable Objectives versus the current baseline? | Mark the Objectives which you believe the Original Solution better facilitates than the current baseline: |
| | | Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D <input type="checkbox"/> E |
| | | Yes we support the Original Solution especially against Grid Code Objectives A, B, C and D. This modification addresses a number of issues following the implementation of the EU Connection Network Codes (namely the Requirements for Generators (RfG), Demand Connection Code (DCC) and HVDC Code). Any change which improves clarity of the Grid Code to the end User is seen as positive and it is for this reason that we support the Proposed Solution. |
| 2 | Do you support the proposed | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

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| | | |
|---|---|--|
| | implementation approach? | Yes, we fully support the implementation approach, in particular how the changes and discussion have been reflected in Annex 4 of the Workgroup Consultation. |
| 3 | Do you have any other comments? | No |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | <input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No Click or tap here to enter text. |
| 5 | Does the draft legal text satisfy the intent of the modification? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes – Further to the dialogue and discussion with NESO Subject Matter Experts and the wider Workgroup, we are comfortable that the draft legal text satisfies the intent of the modification. |
| 6 | Do you agree with the Workgroup's assessment that the modification does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes. As there is a change to Balancing Code 3 (Frequency Control Process), which has a small impact on Balancing, we would agree with the Workgroup's assessment on page 5 of the consultation and that this modification has an impact on the Electricity Balancing Regulation. |
| 7 | Do you have any comments on the impact of the modification on the EBR Objectives? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text. |

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| Specific Workgroup Consultation questions | | |
|---|---|--|
| 8 | Do you agree there are no cross-code impacts regarding the changes to GC5.2 for DCUSA and CUSC? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | | Based on our discussions within the workgroup and externally, we do not believe there will be any cross code changes as a result of this modification. |
| 9 | Do you believe this modification will not have any impact on the Balancing and Settlement Code (BSC). If you do not believe this to be the case, please state your reasons why? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | | No, we do not believe this modification will have an impact on the BSC. |