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## Workgroup Consultation Response Proforma

### GC0183: Generator and Interconnector Availability During a Severe Space Weather Event

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@neso.energy](mailto:grid.code@neso.energy) by **5pm** on **29 August 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 [claire.goult@neso.energy](mailto:claire.goult@neso.energy) or [grid.code@neso.energy](mailto:grid.code@neso.energy)

Respondent details	Please enter your details	
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<b>Which best describes your organisation?</b>	<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*)

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☐ **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)

**For reference the Applicable Grid Code Objectives are:**

- i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;
- ii. 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);
- iii. Subject to sub-paragraphs \* (i) and (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;
- iv. 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
- v. To promote efficiency in the implementation and administration of the Grid Code arrangements

\* See Electricity System Operator Licence

**For reference, 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

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*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;*
- 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 NESO 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 facilitates the	Mark the Objectives which you believe the Original solution better facilitates than the current baseline:
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	Applicable Objectives versus the current baseline?	Original	<input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None
		<p>The proposal is positive for:</p> <ul style="list-style-type: none"> <li>i. Allows the timely provision of critical operational information related to generator and interconnector owner intentions in response to an impending severe space weather event.</li> <li>ii. NESO and market participants will be informed in a timely manner of the potential market situation in response to an impending severe space weather event.</li> <li>iii. NESO will have timely visibility of information regarding the availability of generation plant and interconnectors should a severe space weather event occur.</li> </ul> <p>The proposal is neutral for iv and v.</p>	
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <p>It is worth noting that outside of the code implementation there are considerations for how quickly the process can be utilised due to potential updates to systems including BMRS for sending notifications.</p>	
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 <a href="#">Workgroup Consultation Section</a> )  <input checked="" type="checkbox"/> No	
		N/A	

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5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.
6	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		See response to question 9 below.

## Specific Workgroup Consultation questions

7	Do you believe that the proposed legal drafting currently developed for OC2 is best included in OC2 or should it be in BC1 bearing in mind the space weather timescales involved?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		The space weather proposals in the Grid Code span the period covered by both OC2 and BC1, and we therefore believe either section to be appropriate for the legal text. However, please see response to question 9.
8	Do you believe it is appropriate to have a consequential modification in the STC to ensure TOs declare their asset	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Yes. Grid Code only captures Users and for a full understanding of the possible effects of imminent space weather with respect to equipment outages it is

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	capability during a space weather event in a similar way to Network Operators?	also important to capture obligations in the STC in order to understand what TO impacts there may be.
9	As currently drafted, there is no change to BC1, however, do you believe the changes as proposed in OC2 would have an impact on EBR Article 18 terms and conditions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Although the drafting is in OC2, the implications of this modification may have an impact on the price stack resulting from generators redeclaring their availability in the event of imminent space weather. The consequences of this therefore have an impact on the balancing mechanism and we believe this modification will have an impact on the EBR. To avoid ambiguity, the proposed text in OC2 could be moved to BC1. It would then be clear that there is an EBR implication.</p>