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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 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 or grid.code@neso.energy

Respondent details	Please enter your details	
Respondent name:	Kevin Cowan	
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Phone number:	+44 (0) 117 366 1539	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input 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
		No comment for (iv) & (v)	
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
		<p>Is 10 days considered sufficient for Generators to make the necessary procedural changes?</p> <p>NESO should look to ensure industry are aware of this modification, including public webinars.</p>	
3	Do you have any other comments?	<p>Active vs Passive responses:</p> <p>NESO have included a provision that if no notification is provided then the declaration shall be deemed as to be unchanged from previous values. Clarity is needed on what the previous values referred to are – is this a previous unavailability declaration, or e.g. the latest physical notification from a BMU? Its unlikely that a previous declaration will apply in all circumstances as sites may be on planned or unplanned outage that didn't apply at the last declaration. With this provision a lot of sites may not respond actively and lean on these deemed provisions. How would NESO distinguish in its planning between a site that has actively made a choice (but not responded as it does not need to) vs one that has just missed the ask?</p> <p>Hard compliance with the declaration OC 2.5.1b & 2.5.2b</p> <p>It is our view there should be a provision allowing for deviation from compliance in the event of a safety risk to plant/personnel. Note that the text in the workgroup consultation indicates this is unresolved, awaiting NESO/proposer view. There are precedents in the Grid Code e.g. in BC sections such as BC 2.9.2.1 where Users can reject various instructions based on "...safety</p>	

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		<p>grounds (relating to personnel or plant)..." so such a provision would not be novel. In the WG it was suggested that suitable wording may be "...unless there is a risk of harm to personnel or damage to plant, in which case The Company shall be notified without undue delay".</p> <p>Revisions to declarations – There is no provision to allow for generators to make a new declaration as the situation changes, for example in response to unplanned generator outages or changes to the forecast impact of the space weather (e.g. strength, location, duration). For example G5 level spans a large range of severity so if an event proves to be more severe than originally envisaged, this may challenge the basis for the original output useable declaration. We expect NESO would prefer to have the most up-to-date information.</p> <p>Length of the declaration – Related to the above, the declaration appears to be an open-ended obligation, with the declaration only stood down following a cessation notification from NESO. A declaration may be suitable for the first hours of a possible window but not after a more extended period. NESO should clarify what the obligation is here.</p> <p>Templates for the declaration – We would like to see an example of a declaration template so we can understand how this is being implemented.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request	<p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

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	for the Workgroup to consider?	
5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Although noting above comments for question 3.
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 type="checkbox"/> No
		No comment

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 type="checkbox"/> Yes <input type="checkbox"/> No
		No strong opinion either way. Note that BC likely more relevant based on the overall timescales envisioned (hours, not weeks/months).
8	Do you believe it is appropriate to have a	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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	consequential modification in the STC to ensure TOs declare their asset capability during a space weather event in a similar way to Network Operators?	This should be communicated to any affected parties as soon as possible.
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 type="checkbox"/> Yes
		<input type="checkbox"/> No
		No comment