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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:	Garth Graham	
Company name:	SSE Generation	
Email address:	Garth.graham@sse.com	
Phone number:	01738 456000	
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 checked="" 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)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be

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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 efficient and consistent functioning of day-ahead, intraday and balancing markets;*

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- 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 Applicable Objectives	Mark the Objectives which you believe the Original solution better facilitates than 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

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	versus the current baseline?	Yes, when compared to the baseline, we believe that the Original does better facilitate the Applicable Grid Code Objectives (i), (ii) and (iii); whilst being neutral in terms of (iv) and (v); for the reasoning the proposer has set out (on pages 16-17 of the consultation document).
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments?	<p>SSE Generation has, over the past 15 years or so, been engaged on a number of Governmental type initiatives etc., relating to space weather and generation in GB. In recent times we have actively supported the work that NESO has been undertaking in this topic area; hence why we supported the discussion of this proposal at the July GCDF meeting and provided the briefing to Workgroup colleagues (as shown in Annex 4 to this consultation).</p> <p>Given this lengthy and detailed engagement to date, we support the need for this Original proposal to ensure that the GB electricity sector is prepared (should a severe space weather event occur, or more pertinently, be forecasted to occur) for the eventuality (and what each of the sector participants need to do to help maintain a stable system) noting, in this regard, that it is a realistic possibility that some generation and interconnector assets may cease operations (in order to protect their assets from damage) should a MetOffice forecast, for a severe space weather event, arise.</p>

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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 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Based on this change being focussed on OC2 (and not BC1) we agree with this assessment.

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 Yes, we believe that the proposed legal text should be contained in OC2 (rather than BC1).
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8	Do you believe it is appropriate to have a consequential modification in the STC to ensure TOs declare their asset capability during a space weather event in a similar way to Network Operators?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Yes, from the deliberations in the Workgroup to date, we believe it is appropriate to have a consequential STC Modification to ensure that relevant TOs declare their asset capability ahead of / during a space weather event.</p>
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 checked="" type="checkbox"/> No <p>In our view the proposed changes, to OC2, do not impact on EBR Article 18 terms & conditions.</p>