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Draft Final Modification Report

GC0169: Material changes arising from Grid Code Modification GC0136

Overview: This modification is designed to address a number of non-specialist changes identified following Grid Code Modification [GC0136: Non-material changes to Grid Code following implementation of the EU Connection Codes](#).

Modification process & timetable

1	Proposal Form 06 March 2024
2	Workgroup Consultation 20 March 2025 – 10 April 2025
3	Workgroup Report 16 July 2025
4	Code Administrator Consultation 30 July 2025 – 05 September 2025
5	Draft Final Modification Report 17 September 2025
6	Final Modification Report 07 October 2025
7	Implementation 10 Business Days after Authority decision

Have 5 minutes? Read our [Executive summary](#)

Have 60 minutes: Read the [Draft Final Modification Report](#)

Have 120 minutes? Read the full Draft Final Modification Report and Annexes.

Status summary: The Draft Final Modification Report has been prepared for the recommendation vote at Panel.

Panel recommendation: The Panel will meet on 25 September 2025 to carry out their recommendation vote.

This modification is expected to have a: **Low impact** on NESO, Grid Code Users, and Transmission Licensees

Modification drivers: Efficiency, Governance, and Transparency

Governance route	Standard Governance modification with assessment by a Workgroup	
Who can I talk to about the change?	Proposer: Antony Johnson antony.johnson@neso.energy	Code Administrator Chair: Jess Rivalland Jessica.rivalland@neso.energy

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Executive Summary

The modification is needed to address outstanding issues identified during Grid Code modification [GC0136](#), ensuring consistency and clarity in definitions and terms related to the Grid Code. The proposed solution includes assessing specific terms, improving certain clauses, and ensuring alignment with existing regulations.

What is the issue?

The proposed change to the Grid Code is essential for maintaining consistency, clarity, and addressing unresolved issues arising from Grid Code modification GC0136.

What is the solution and when will it come into effect?

Proposer's solution: Key updates include enhancing the Glossary and Definitions for terms like Caution Notice, adjusting the definition of SHETL (Scottish Hydro-Electric Transmission Limited), and reviewing the requirements in OC (Operating Code) 9.6.4. Additionally, a review of the requirements in BC (Balancing Code) 2.13 regarding interconnector transfer times and associated defined terms was also undertaken as part of this modification and further checks were made to ensure alignment with Engineering Recommendation G99. As part of this modification, a review of some of the paragraphs in the General Conditions (GC) was also undertaken.

Implementation date: 10 Business Days after Authority decision.

What is the impact if this change is made?

The low impact of this modification on NESO, Grid Code Users, and Transmission Licensees arises as the proposed changes to the Grid Code are designed to provide greater clarity, consistency, and understanding to Users rather than any new requirements. In this respect, the modification is seen as having a low impact on the industry.

Workgroup conclusions: The Workgroup concluded unanimously that the Original Solution better facilitates the Applicable Grid Code Objectives than the Baseline.

Code Administrator Consultation: The Code Administrator Consultation received 1 non-confidential response and 0 confidential responses.

Panel recommendation: Panel will meet on 25 September 2025 to carry out their recommendation vote.

Interactions

Initially, the Workgroup looked at potential interactions between the Distribution Code, Engineering Recommendation G99, and the Balancing and Settlement Code (BSC), but concluded that the only interaction as a result of this modification is on the Electricity Balancing Regulation (EBR).

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What is the issue?

This modification is necessary and arises from the outstanding issues identified outside the scope of Grid Code modification GC0136 (Non-material changes to Grid Code following implementation of the EU Connection Network Codes).

Why change?

The change is necessary to ensure consistency and clarity of the Grid Code arising from the outstanding issues identified in Grid Code modification GC0136.

What is the solution?

Proposer's solution

At a high level, the Proposer's Solution aims to address the following issues:

- a. Address the non-specialist issues raised following Grid Code modification GC0136. These are detailed in **Annex 4** of this Code Administrator Consultation and in summary include the following elements:
- b. Glossary and Definition changes – Caution Notice / Consistency of International System of Units (SI units) / Interconnector Scheduled Transfer / Intraday Cross-Zonal Gate Closure Time;
- c. Glossary and Definition changes – Change the SHETL and SP Transmission (SPT) definition to that of a plc;
- d. OC9.6.4 – Clarification required to OC9.6.4 based on the feedback received as part of Grid Code Modification GC0136;
- e. BC2.13 – Interconnector Scheduled Transfer / Intraday Cross-Zonal Gate Closure Time / relationship with Glossary and Definitions;
- f. General Conditions (GC) – Re-word Paragraph GC5.2 and GC5.4 and confirm if clauses GC11.2 and GC15.1 can be simplified; and
- g. Ensure consistency between Grid Code and G99.

As part of the solution, all of the above issues were considered and discussed by the Workgroup. A detailed summary of these issues and how they were resolved is covered in **Annex 4**.

One of the clauses requiring attention and as identified as part of GC0136 relates to BC2.13. The issue relates to the terms “Intraday Cross-Zonal Gate Closure Time” and “Interconnector Scheduled Transfer” which are not defined terms in the Grid Code. The Workgroup assessed whether these should be defined terms or simply undefined but

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upon investigation it was revealed that these corrections had already been implemented into the Grid Code through another modification which had taken place between the conclusion of [GC0136](#) and the baseline used to derive the GC0169 draft Legal Text. The Workgroup agreed that these terms (as per the current live version of the Grid Code) should remain undefined.

As part of this modification, some changes have been made to BC3.7.3(a) which removes some superfluous text to aid clarity. As this text forms part of the Balancing Code, an assessment was undertaken as part of the modification to see if there would need to be any changes to Annex GR.B of the Governance Rules and hence if there is a change to the Terms and Conditions relating to Balancing Service Providers which fall under Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195) which is not believed to be the case.

One specific point worth noting, is that as part of Grid Code Modification GC0136, a Stakeholder referred to CP.A.3.2.1 mentioning that the reference to an open loop response should be changed to a closed loop response. When the GC0169 proposal was being developed, NESO considered this to be a complex issue as it would require specialist knowledge, and it would fall outside the scope of GC0169. The issue was referred to the NESO Technical Compliance department who addressed the matter with the Stakeholder and this was resolved and formally clarified at the Grid Code Review Panel through [Action 460](#). It has therefore not been considered further by the GC0169 Workgroup.

Workgroup considerations

The Workgroup convened 6 times to discuss the identified issue within the scope of the defect, develop potential solutions, and evaluate the proposal in relation to the Applicable Grid Code Objectives.

Consideration of the Proposer's solution

The Workgroup reached a consensus that the modification will necessitate changes to Balancing Code 3, which will have an effect on the EBR. The Proposer confirmed that whilst the proposed changes will have an impact on the EBR no changes are needed to Annex GR.B of the Governance Rules. However, in accordance with the rules of the EBR, it is essential for the GC0169 Code Administrator Consultation to run for a minimum period of a month.

The Workgroup assessed **Annex 4** – Summary of Changes post GC0136 concerning the scope of GC0169, and several points were noted. It was highlighted that the bold terms in BC2.1.3 had already been corrected through an earlier Grid Code modification post

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GC0136. In addition, the issue identified in CP.A.3.2.1 of the Compliance Processes was identified as a specialist issue falling outside the Terms of Reference of GC0169 and was addressed separately through Action 460 of the Grid Code Review Panel.

GC5.1 and GC5.2 has been streamlined to specify the parties to whom the obligations apply, for example Network Operators, Non-Embedded Customers, and Interconnectors, rather than listing all those it does not apply to, such as Generators and Suppliers.

A Workgroup member also raised a concern about the wording in GC5.2 and its potential conflict with other codes: Distribution Connection and Use of System Agreement (DCUSA), CUSC, and BSC. The Proposer consulted with NESO Legal to check if there are any conflicts, and they suggested there may be some consequential changes with the BSC. These are summarised as follows:

- i) The only potential interaction identified is in BSC Section H, para 9.2.1(a) which relates to communications in general, but we do not believe this will necessitate a change to the BSC.
- ii) In addition to the above draft Legal Text, BSC, Section O, para 1.2.1(c) provides that the Grid Code governs communications between NETSO and a Party in relation to Section Q of the BSC (Balancing Services Activities), but NESO do not believe this to be an issue.
- iii) Lastly, NESO also considered the Communications Requirements document under the BSC, the Proposer having discussed this issue with NESO Legal, did not believe there are any interactions with this section.

The above items were also discussed with Elexon and it was agreed that no changes were needed to the BSC as a consequence of this modification.

The Workgroup made proposals for enhancing clarity and readability in GC5.4, and NESO Legal expressed satisfaction with these revisions.

The Proposer indicated that both a User and National Grid Electricity Transmission (NGET) can propose a modification in relation to the Electrical Standards detailed in GC11.2. The proposed draft Legal Text was assessed by NESO Legal, leading to a few recommended changes. NESO Legal confirmed that that GC15.1 could be deleted as it pertains to a legacy issue.

The definition of 'Caution Notice' in the Glossary & Definitions (G&D) was discussed, with a proposal to align it with the safety rules to avoid inconsistencies. Given its established role in safety rules, the prospect of removing the definition from the Grid Code was also

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considered. It was agreed that the definition could be updated and this has been reflected in the Legal Text.

The Workgroup concurred that the Grid Code updates should ensure alignment for SPT and SHETL in the G&D noting that both organisations are Public Limited Companies (PLCs).

As part of the GC0169 work, it was noted that there are challenges in identifying and correcting incorrect SI units throughout the Grid Code. As a result, it was suggested that only the G&D should be revised in this modification, with plans for future adjustments to address other incorrect SI units in the main body of the Grid Code at a future date. A list of those SI units referenced in the G&D and how they were updated is listed in **Annex 5**.

The consistency between the Grid Code and Engineering Recommendation G99 was discussed, and confirmation was received that the latest version of G99 and the Grid Code align. The Proposer noted that reviewing the Compliance Processes CP.A.3.2.1 was outside the remit of GC0169 due to its requirement for specialised knowledge. This issue was addressed separately via Action 460 of the Grid Code Review Panel (GCRP) and was not discussed in the GC0169 Workgroup.

The concerns regarding Operating Code OC.9.6.4 were unclear, but after discussing the issue within the Workgroup and following up with the stakeholder who originally raised this point, it was agreed that no changes were needed.

The Workgroup discussed the European Connection Conditions ECC.6.3.7.1.4 and agreed with a suggestion by one Workgroup member that some of the text could be removed, as it was deemed superfluous.

In respect of the Proposer's assessment, the identified impact for Grid Code Objectives b) and c) were amended from Neutral to Positive.

The Workgroup have considered interactions between this modification and the Distribution Code G99 and do not believe there are any.

The Workgroup members discussed the costs and implementation associated with the modifications and agreed they are administrative. It was noted that there are no additional costs such as software changes or new obligations on any parties.

The Workgroup members evaluated the need for additional resources and decided that the existing members, in conjunction with NESO Legal, were adequate for the Workgroup discussions.

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Workgroup Consultation Summary

The Workgroup held their Workgroup Consultation between 20 March 2025 – 10 April 2025 and received 4 non-confidential responses and 0 confidential responses. The full responses and a summary of the responses can be found **Annexes 6 and 7**.

Objectives which the Proposer's solution better facilitates the Applicable Grid Code

Objectives than the baseline: One respondent chose objective (a), three respondents chose objective (b), two respondents chose objective (c), three respondents chose objective (d), and three respondents chose objective (e).

Support for solution: All respondents were supportive of the proposed solution. One respondent noted that they believe the solution addresses issues resulting from the EU Connection Network Codes and the proposed changes enhance clarity for the end user.

Support for implementation approach: All respondents were supportive of the chosen implementation approach, making no additional comments.

Alternative Requests: There were no Alternative Requests raised in the consultation responses.

Draft Legal Text: All respondents confirmed that the draft Legal Text satisfied the intent of the modification, with the majority of respondents making no additional comments. One respondent identified editorial points in the draft Legal Text and submitted a marked-up version highlighting those points.

Impact on the Electricity Balancing Regulation (EBR) Article 18 Terms and Conditions

(T&Cs): All respondents confirmed that the proposal does impact the EBR Article 18 T&Cs. One respondent noted that as they believe there is a proposed change to Balancing Code 3, this would have a minor impact on the EBR.

Cross-code impacts regarding the changes to GC5.2 for DCUSA and CUSC: All respondents confirmed that there were no cross-code impacts regarding the changes to GC5.2 for DCUSA and CUSC, making no additional comments.

Impact on the Balancing and Settlement Code (BSC): All respondents confirmed that the proposal does not impact the BSC.

Legal Text

The Legal Text for this change can be found in **Annex 3**.

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What is the impact of this change?

Proposer's assessment against Grid Code Objectives

Relevant Objective	Identified impact
i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;	Neutral By clarifying the Grid Code as indicated in the Proposer's solution, it will improve clarity. This is marginally seen as positive overall but generally considered neutral in respect of this Grid Code objective.
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);	Positive By clarifying the Grid Code as indicated in the Proposer's solution, it will improve clarity. This is marginally seen as positive overall from a competition perspective but generally considered neutral in respect of this Grid Code objective.
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;	Positive By clarifying the Grid Code as indicated in the Proposer's solution, it will improve clarity. This is marginally seen as positive overall but generally considered neutral in respect of this Grid Code objective.
iv. To efficiently discharge the obligations imposed upon the licensee by this license* and to comply with the Electricity Regulation and	Positive As NESO is responsible for Administration of the Grid Code,

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any relevant legally binding decisions of the European Commission and/or the Agency; and	improving clarity is a key objective and therefore we see this modification as positive in respect of this Grid Code objective.
v. To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive As NESO is responsible for Administration of the Grid Code, improving clarity is a key objective and therefore we see this modification positive in respect of this Grid Code objective.

* See Electricity System Operator Licence

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Positive This modification will improve clarity identified from the outstanding issues of Grid Code modification GC0136 . Whilst not having a direct impact on improved safety and reliability of the System, it will improve clarity which we overall see as positive.
Lower bills than would otherwise be the case	Neutral There will be no impact to lower bills as a result of this modification.
Benefits for society as a whole	Positive The Grid Code is a complex document running to many pages. Any change which improves clarity to Stakeholders and User's in addition to resolving any

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	outstanding issues from a previous Grid Code Modification (GC0136) is only seen as positive.
Reduced environmental damage	Neutral There will be no impact to environmental damage as a result of this modification.
Improved quality of service	Positive The Grid Code is a complex document running to many pages. Any change which improves clarity to Stakeholders and User's and hence the quality of service they receive is only seen as positive.

Workgroup Vote

The Workgroup met on 06 June 2025 to carry out their Workgroup Vote. The full Workgroup Vote can be found in **Annex 8**. The table below provides a summary of the Workgroup Members' view on the best option to implement this change.

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

The Workgroup concluded unanimously that the Original Solution better facilitated the Applicable Grid Code Objectives than the Baseline.

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Option	Number of voters that voted this option as better than the Baseline
Original	5

Code Administrator Consultation Summary

The Code Administrator Consultation was issued on 30 July 2025, closed on 05 September 2025 and received 1 non-confidential response and 0 confidential responses. A summary of the response can be found in the table below, and the full response can be found in **Annex 11**.

Code Administrator Consultation summary	
Question	
Do you believe that the GC0169 Original Proposal better facilitates the Grid Code Applicable Objectives?	The respondent stated that the change would better facilitate objectives i), ii), iii) and iv).
Do you support the proposed implementation approach?	The respondent supports the implementation approach.
Do you have any other comments?	None.
Legal text issues raised in the consultation	
No legal text issues were raised	
EBR issues raised in the consultation	
No EBR issues were raised	

NESO response to EBR issues raised in the Code Administrator Consultation

NESO was not asked to provide a response due to there being no EBR issues raised in the Code Administrator Consultation.

Panel Recommendation vote

The Panel will meet on 25 September 2025 to carry on their recommendation vote.

They will assess whether a change should be made to the Grid Code by assessing the proposed change and any alternatives against the Applicable Objectives.

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Panel comments on EBR impacts

The Panel will discuss when they meet on 25 September 2025 to carry out their recommendation vote.

When will this change take place?

Implementation date

10 Business Days after Authority decision.

Date decision required by

There is no specific back stop date required for this modification.

Implementation approach

The implementation approach will seek to identify what issues can be addressed from within the expertise of the Workgroup. A number of the Workgroup have experience of Grid Code modification [GC0136](#) and [Engineering Recommendation G99](#). In lieu of this, this modification has been established as a combined Grid Code / Distribution Code Working Group.

Interactions

<input type="checkbox"/> CUSC	<input type="checkbox"/> BSC	<input type="checkbox"/> STC	<input type="checkbox"/> SQSS
<input type="checkbox"/> European Network Codes	<input checked="" type="checkbox"/> EBR Article 18 T&Cs ¹	<input type="checkbox"/> Other modifications	<input checked="" type="checkbox"/> Other

Interaction with the Electricity Balancing Guideline (EBR), however no changes are needed to Annex GR.B of the Governance Rules.

¹ If your modification amends any of the clauses mapped out in Annex GR.B of the Governance Rules section of the Grid Code, it will change the Terms & Conditions relating to Balancing Service Providers. The modification will need to follow the process set out in Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195). All Grid Code modifications must be consulted on for 1 month in the Code Administrator Consultation phase, unless they are Urgent modifications which have no impact on EBR Article 18 T&Cs. N.B. This will also satisfy the requirements of the NCER process.

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Acronyms, key terms and reference material

Acronym / key term	Meaning
BC	Balancing Code
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CP	Compliance Processes
CUSC	Connection and Use of System Code
DCC	Demand Connection Code Network Code (Commission Regulation (EU) 2016/1388)
DCUSA	Distribution Connection and Use of System Agreement
GCRP	Grid Code Review Panel
EBR	Electricity Balancing Guideline
ECC	European Connection Conditions
ECP	European Compliance Processes
G99	Engineering Recommendation G99 - Requirements for the connection of generation equipment in parallel with public distribution networks on or after 27 April 2019
GC	General Conditions
G&D	Glossary & Definitions
HVDC	High Voltage DC Network Code (Commission Regulation (EU) 2016/1447)
NGET	National Grid Electricity Transmission
OC	Operating Code
RfG	Requirements for Generators Network Code (Commission Regulation (EU) 2016/631)
SI Unit	International System of Units
SHET	Scottish Hydro-Electric Transmission

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SHETL	Scottish Hydro-Electric Transmission Limited
SPT	SP Transmission
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions

Annexes

Annex	Information
Annex 1	GC0169 Proposal form
Annex 2	GC0169 Terms of Reference
Annex 3	GC0169 Legal Text
Annex 4	GC0169 Summary of changes post GC0136 in scope of GC0169
Annex 5	GC0169 Discussion of changes relating to SI units
Annex 6	GC0169 Workgroup Consultation responses
Annex 7	GC0169 Workgroup Consultation summary
Annex 8	GC0169 Workgroup Vote
Annex 9	GC0169 Workgroup Attendance Record
Annex 10	GC0169 Workgroup Action Log
Annex 11	GC0169 Code Administrator Consultation Response