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Code Administrator 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 **20 October 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 grid.code@neso.energy

Respondent details	Please enter your details	
Respondent name:	Nina Sanghera	
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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 checked="" 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 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, (for consultation questions 4 & 5) 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 Code Administrator Consultation questions			
1	Please provide your assessment for the proposed solution against the Applicable Objectives versus the current baseline?	Mark the Objectives which you believe the proposed solution better facilitates than the current baseline:	
		Original	<input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None
		We offer qualified support for this modification and believe that, on balance, it better facilitates the Applicable Grid Code Objectives, (i) and (iii). We	

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		<p>recognise the importance of the modification's purpose to provide NESO with timely and critical information about the operational status and intentions of generators and interconnectors.</p> <p>Objective (i): The provision of a 'Space Weather Output Usable Declaration' will enable NESO to operate the system more efficiently during a space weather event by having a clear view of the assets available.</p> <p>Objective (iii): The obligation on generators to declare their intended position can enable NESO to proactively manage potential scenarios.</p> <p>We consider AO (iv) and (v) to be neutral versus the baseline.</p> <p>Our 'qualified' support relates to concerns regarding the practicality of implementation, the need for clear guidance on the methodology generators should use to assess the operational and compliance impact of the proposed obligations, and clarity as to the status of REMIT notifications made under the obligations.</p>
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>We have concerns regarding the proposed 10-business days implementation timeframe. While we recognise the urgency driven by the current solar cycle, the short implementation period may not be sufficient for parties to adequately identify their position in such events.</p> <p>We are also concerned about the clarity of the obligations placed on generators and the practical implications of the proposed implementation</p>

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		<p>timeline. In our view, there are aspects of the proposed obligation that require further guidance and a uniform framework to ensure compliance.</p> <p>The expectation for impacted parties to be in a position to fulfil this obligation within 10-business days could be unworkable for both small and large generators. While we understand the need for urgency on this change, we believe that the current proposed timeline is insufficient.</p> <p>We ask that the implementation timeline for this change is revised to include a period of time to allow impacted parties to embed this change into their practices.</p>
3	Do you have any other comments?	<p>We are concerned that there is a need for clarity of the REMIT obligations. Generators should be provided with the appropriate action(s) they should take in various scenarios. For example, if a generator was 'off' at the time of notification, there should be guidance on whether they are still required to declare their position.</p> <p>The consultation states that the modification does not require generators to perform formal GIC risk assessments. However, to ensure consistent and effective compliance with the new obligations, it would be beneficial for NESO to provide clear guidance on the key operational factors, such as locational factors that generators should consider when making their declaration. We also have some reservations as to the act of declaring on REMIT an "intended position" which may or may not materialise. This could create more ambiguity and</p>

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		<p>not necessarily reflect an accurate picture of a generator's position during an event.</p> <p>Overall, we are concerned that the solution could lead to inconsistency in responses and information. It would be helpful for Ofgem to provide clarity on the expectations for REMIT notifications and NESO should provide guidance to parties on the risk factors to ensure consistency and efficient reporting.</p>
4	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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We agree with the Workgroup's assessment that the modification does impact the EBR Article 18 terms and conditions.</p>
5	Do you have any comments on the impact of GC0183 on the EBR Objectives?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>This proposal promotes visibility and helps maintain system security which is consistent with the EBR objectives.</p>