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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	
<b>Respondent name:</b>	Jonathan Lakey	
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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 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:

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(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 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

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**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;*
- 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.

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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 versus the current baseline?	Mark the Objectives which you believe the Original solution better facilitates than the current baseline:		
		<table border="1"> <tr> <td>Original</td> <td> <input type="checkbox"/>i           <input type="checkbox"/>ii           <input type="checkbox"/>iii           <input type="checkbox"/>iv           <input type="checkbox"/>v           <input checked="" type="checkbox"/>None         </td> </tr> </table>	Original	<input type="checkbox"/> i <input type="checkbox"/> ii <input type="checkbox"/> iii <input type="checkbox"/> iv <input type="checkbox"/> v <input checked="" type="checkbox"/> None
		Original	<input type="checkbox"/> i <input type="checkbox"/> ii <input type="checkbox"/> iii <input type="checkbox"/> iv <input type="checkbox"/> v <input checked="" type="checkbox"/> None	
<p>i) NEGATIVE: There does not appear to be a standardised method to assess the impact of GICs on electricity assets. Without clear guidance it may be prohibitively expensive to undertake an assessment and without common standards, the variable results of any assessment could make them practically useless.</p> <p>ii) NEGATIVE: During a space weather event the reduction of output by some parties due to a non market factor may result in high prices for consumers. There is also an economic incentive to not declare a reduction in output due to GICs to capitalise on this market event.</p>				

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		<p>iii) NEUTRAL: The proposal will increase the security of the electricity system but only if there is a consistent standardised approach.</p> <p>v) NEGATIVE: Introducing new requirements for users, which may be expensive and complex, does not increase the efficiency of the grid code.</p>
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>The current proposal lacks clear assessment guidance. NESO should provide clear assessment guidance as part of this modification so that users can better understand the impact.</p>
3	Do you have any other comments?	<p>There does not seem to be a standardised approach to assessing the impact of GICs on the electricity system. This should be agreed before users are held to the requirements of GC0183 so that the impact of the modification can be understood.</p> <p>What happens If a party does not reduce output during a space weather event based on their assessment, but ends with reduced output due to GICs?</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input checked="" type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation</a> Section)</p> <p><input checked="" type="checkbox"/> No</p> <p>NESO could be required to carry out a GB NETS GIC assessment and use the results to issue data for</p>

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		each user. This could then be used alongside NESO guidance to undertake a standardised availability assessment.
5	Does the draft legal text satisfy the intent of the modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Legal text puts the onus on the Generator to carry out GIC assessments to be able to declare availability during Severe Space Weather Events. However, there is no standard way to undertake these assessments particularly on a discrete asset. The field is not mature enough to expect users to provide accurate information. Inaccurate information would then prevent NESO from being able to maintain the functionality of the NETS.</p>
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 <p>n/a – responder is not familiar with Article 18 of the Electricity Balancing Regulation</p>

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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 checked="" type="checkbox"/> No <p>As the modification is concerned with timescales of a few hours, OC2 is not the ideal method of implementation. The only timescales &lt;24hrs concern publishing on REMIT. Ideally, users would declare their output capacity at set GIC levels so that they could reduce to these levels following a notification.</p>
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>It is likely that TOs (incl. OFTOs) may be more affected by GICs than Generators and Interconnectors. This would impact Generators and Interconnectors ability to export which would likely have to be managed via the balancing mechanism.</p>
9	As currently drafted, there is no change to BC1, however, do you believe the changes as proposed in OC2	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>n/a – responder is not familiar with Article 18 of the Electricity Balancing Regulation</p>

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	would have an impact on EBR Article 18 terms and conditions?	
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