

Public

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:	Simon Baxter, Unjulia Sarna	
Company name:	National Grid Ventures (NGV), representing IFA, IFA2, NSL, Viking Link and Nemo Link	
Email address:	Simon.baxter@nationalgrid.com Unjulia.sarna@nemolink.co.uk	
Phone number:	-	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input checked="" 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

Public

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 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

Public

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.

Public

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?	<p>Mark the Objectives which you believe the Original solution better facilitates than the current baseline:</p> <table border="1"> <tr> <td>Original</td> <td> <input checked="" type="checkbox"/>i <input type="checkbox"/>ii <input checked="" type="checkbox"/>iii <input checked="" type="checkbox"/>iv <input type="checkbox"/>v <input type="checkbox"/>None </td> </tr> <tr> <td colspan="2">-</td> </tr> </table>	Original	<input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None	-	
Original	<input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None					
-						
2	Do you support the proposed implementation approach?	<p> <input type="checkbox"/>Yes <input checked="" type="checkbox"/>No </p> <p>Clarity on Process, Systems, and Formats for Declarations</p> <p>We request further clarity on the process, IT systems, and format for submitting Space Weather Output Usable Declarations, especially for interconnectors.</p> <p>Interconnector Owners must develop processes to rapidly assess and declare asset availability during space weather events, potentially requiring new internal protocols and IT system updates.</p>				

Public

		A test environment or dry run prior to implementation might be useful additions to the approach.
3	Do you have any other comments?	<p>Declaration Timing</p> <p>The requirement to submit a Space Weather Outage Declaration within three hours of a Prepare Notification may be challenging for Interconnectors operating across jurisdictions (where operational decisions depend on EU TSOs). We would appreciate if NESO could clarify whether flexibility will be considered for cross-border coordination.</p> <p>If Interconnector Owners are unable to respond within the required timescales (especially for notifications issued with short notice), there may be compliance risks or operational conflicts.</p> <p>REMIT and Market Communications</p> <p>NESO will need to provide guidance on REMIT and market communications. We request further engagement on the alignment of these requirements with European codes and cross-border operational practices. Given the cross-border nature of Interconnectors, NESO should coordinate with EU TSOs to ensure consistent responses and avoid market fragmentation.</p> <p>Under the current drafting of this modification, NGV will have very little information to assess the impact on our flow schedule if we are informed of an imminent space weather event. At the time of issuing, the Outage Declaration would not be Precise (pending a subsequent 'Possible' Notification). This information could become precise and hence Inside Information from the point of (or very soon after) the 'Possible' Notification being issued. NESO should consider how the Declaration is worded and its interaction with REMIT obligations, given that NESO may effectively become in possession of Inside Information prior to any capability reduction being published on the REMIT portal (even if this is acceptable on a basis of confidentiality such that NESO can discharge its official duties).</p> <p>Additionally, we must be wary of sharing false or misleading information with the market to avoid breaching our obligation to avoid market manipulation under REMIT. Circumstances where some level of capability may or may not happen, which is contrary to REMIT Notice, expose us to risk, if the notification is deemed to be likely to influence market behaviour/prices but the Event/reduction in output doesn't occur. Guidance on and consideration for this scenario is necessary.</p> <p>Partial Availability</p> <p>We have taken the draft legal text to mean that partial flow reductions will be permitted. This is critical for managing market expectations and contractual obligations. We think there should be flexibility to deviate from the notification once issued or issue an amendment. The notification will be our best estimate expected at the time, and so we might want to amend the Space Weather Output Usable Declaration (based on analysis) and be able to offer a higher flow level to the market during/after the event. The Grid Code text needs to be clear about requirements, and flexibility to deal with potential scenarios.</p>

Public

		<p>Potential Conflict with Force Majeure and Asset Protection</p> <p>We seek confirmation that the requirements do not conflict with force majeure or asset protection protocols.</p> <p>Planned Outage Classification</p> <p>The proposal states that declared outages will be treated as Planned Outages. We would like NESO to confirm how this will interact with existing outage planning and reporting frameworks. It is unclear what the relevance is of classifying this as a Planned Outage. If it is for a particular reason, we suggest to state what that is.</p> <p>Asset Vulnerability Guidance</p> <p>If possible, NESO should provide technical criteria (e.g. the level of dc current expected to be flowing in the transformer neutral) or thresholds to help Interconnectors assess asset vulnerability to space weather. A standardised approach would support consistency and reduce uncertainty.</p> <p>If the information is available, NESO should offer access to data or detail impacts on previous Space Weather events (based on severity of event and asset characteristics).</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<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>N/A</p>
5	Does the draft legal text satisfy the intent of the modification?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>The term 'Possible' Notification implies a tentative state but is for an event that is expected to happen and trigger outages or output reductions in a matter of 20-60minutes. We think 'Imminent' in the title better reflect the urgency. We note that 'Imminent' is used in the definition description.</p> <p>The phrase 'Space Weather Expected Notification' implies the event hasn't happened yet, although the description states that it has.</p> <p>Interconnector Operators need more clarity around the meaning of "undue delay", as this is quite vague and open to interpretation. NESO-provided guidance on their expectations around "undue delay" would be useful, clarifying whether 'within 3 hours from the Notification being published' seen as no "undue delay"?</p>

Public

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

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
		We agree that there is logic to it all being contained within the same Code to avoid the end-to-end process becoming harder to follow.
8	Do you believe it is appropriate to have a consequential modification in the	<input type="checkbox"/> Yes
		<input type="checkbox"/> No
		We do not have a view.

Public

	STC to ensure TOs declare their asset capability during a space weather event in a similar way to Network Operators?	
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
		-