

Eleclink Limited
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London
W2 6BD

Claire Gault
National Energy System Operator
Faraday House
Gallows Hill
Warwick
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BY EMAIL ONLY

Friday, 29 August 2025

Dear Claire,

RE: GC0183 workgroup consultation

Eleclink Limited ("**Eleclink**") welcomes the opportunity to respond to this consultation in relation to proposed Grid Code modification GC0183.

Eleclink is a 1000MW HVDC electricity interconnector between Great Britain and France, which commenced full commercial operations in May 2022. Eleclink has responded to individual questions raised in the consultation paper in the pro forma provided, included below.

If you have any questions regarding the response, please contact the Eleclink Regulation team – regulation@eleclink.co.uk.

Yours Sincerely,



Patrick Murphy
Regulatory Manager

Eleclink Limited

Eleclink Limited
4 Kingdom Street,
London, W2 6BD

Registered number 7595420
Registered in England

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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:	Patrick Murphy	
Company name:	Eleclink Limited	
Email address:	patrick.murphy@eleclink.co.uk	
Phone number:	Click or tap here to enter text.	
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

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 versus the current baseline?	Mark the Objectives which you believe the Original solution better facilitates than the current baseline:
		<div>Original</div> <div> <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 </div>
		Click or tap here to enter text.

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2	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>At a principles-based level, Eleclink are supportive of the NESO's efforts to obtain information from market participants where there is a material risk that space weather events could impact upon the functioning of the electrical system. However, we are concerned that the proposed modification is seeking to come into effect within 10 business days following a decision from the Authority, and that this timeframe would not provide industry with sufficient time to implement the desired changes.</p> <p>To date, Workgroup discussions – which Eleclink have been an active member of – have predominantly focused on the specific legal wording of the Grid Code changes being sought. It is Eleclink's view that there has been no due consideration given for the practical implementation of the code modification being sought, such as, any business requirements that Generators and/or Interconnectors may have to implement changes to their respective IT systems, or information on what support will be provided to ensure the successful implementation of the requirements being sought.</p> <p>By way of example, at present, Eleclink do not readily obtain information and/or NESO market instructions from the BMRS system. As such, internal procedural and IT system changes will be required to fully implement the requested code modification. This raises a series of questions:</p> <p>(1) in the event the code modification is approved and implemented, from where within the BMRS system will notifications be published? It is crucial that all technical and non-technical requirements are fully documented (notification location, data format) and transparent for</p>
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		<p>both existing and future market parties, so that notifications are received and responded to, as appropriate;</p> <p>(2) what precise information and in what format(s) will the NESO expect responses from market participants to take? For example, will there be a standardised formal template with mandatory and/or optional information fields that will need to be populated; and</p> <p>(3) what support mechanism(s) will be put in place for market parties to test the notification sharing process end-to-end? We will need to ensure that notifications are being received and responded to as expected.</p> <p>To help address these concerns, Eleclink have identified existing routes for the sharing information between the NESO and market participants that could be leveraged and should be considered for the provision space weather notifications:</p> <ol style="list-style-type: none"> 1. In addition to the NESO issuing notifications on BMRS, notifications could be issued via the Operational & Safety Messaging System (OSMS). This system is actively used for the receipt of notifications from the NESO and the issuance of secure responses. 2. Market participants publish their Space Weather Output Usable Declaration within the eGAMA portal. We assume that the NESO should be able to readily update the existing submission template within the eGAMA portal to include new optionality for space weather notifications.
3	Do you have any other comments?	<p>Eleclink has two further areas of concern that it wishes to raise regarding the proposed modification. These are:</p>

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		<p>1. The code modification is seeking to compel market participants to publish REMIT updates in all instances where a 'Space Weather Output Useable Declaration' is sent to the NESO.</p> <p>It is Eleclink's view that following the issuance of a 'Space Weather Prepare Notification' by the NESO, market parties will broadly take one of two actions:</p> <ul style="list-style-type: none"> (i) Maintain its prior position, with no change. (ii) Deviate from its prior position (i.e., de-load an interconnector in part or in full, change its generation profile) <p>Whilst Eleclink are of the view that type (ii) scenarios may constitute a REMIT notifiable event, it is unclear to Eleclink under which aspect(s) of the regulation on wholesale energy market integrity and transparency (the "REMIT regulation") a market party would be required or compelled to publish a REMIT update for type (i) scenarios. That being, the NESO have issued a space weather notification (which is information in the public domain) and the Interconnector/Generator has not changed course, meaning that that there is no inside information that would need to be disclosed to the broader market.</p> <p>Eleclink do not believe it is for the Grid Code to determine what should be a REMIT notifiable event, or for the NESO and/or Grid Code to go beyond the existing REMIT regulatory requirements. By way of example, the REMIT regulation allows for market participants to delay disclosure of inside information so as not to prejudice its legitimate interests. This could lead to a situation where Ofgem views a delayed disclosure as appropriate and in accordance with the REMIT requirements, but the</p>
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		<p>delay is deemed as not being in accordance with the new Grid Code requirements.</p> <p>In the event the code modification continues to seek to compel market participants to publish a REMIT notification, it is Eleclink's view that clarity must be sought from Ofgem and that appropriate guidance is formally issued by Ofgem to prevent any misalignments or confusion on the requirements of market participants.</p> <p>2. The proposed legal wording of Operating Code 2 clause OC2.5.1(b). This point is discussed further in Eleclink's response to question 5.</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>Eleclink do not wish to raise an Alternative Workgroup proposal at this time. However, this it to be reconsidered following the Workgroup Consultation.</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>In accordance with the Workgroup Consultation document, this code modification is <i>"aimed at providing greater visibility [to the] NESO of the operational status of key assets in the event of a space weather event"</i>. Eleclink believe that this intent is recognised within the definition of the 'Space Weather Output Usable Declaration' (see the Workgroup Glossary Definitions document), whereby this declaration is a Generators/Interconnectors <i>"best estimate of the expected (un)availability of their specified Plant"</i>.</p>

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		<p>As such, Eleclink believe that there is a disconnect between an Output Usable Declaration being submitted on the proviso that it is a 'best estimate', and condition OC2.5.1(b) of Operating Code 2, which following the submission of this best estimate, would then require a Generator/Interconnector to maintain that position, until a future point where they may be able to issue a new submission to the NESO (i.e., in situations where the 3-hour window for market participants to issue a Space Weather Output Usable Declaration to the NESO has passed, and further updates cannot be made to the NESO).</p> <p>Whilst Eleclink understand the importance of providing 'best estimate' information to the NESO, Eleclink believe that internal decisions reached by companies within the 3-hour reporting window may need to be made at pace without perfect information being available to them.</p> <p>As such, there could be perfectly reasonable situations where following the NESO's 3-hour window for the submission of Space Weather Output Usable Declaration, market parties may need to deviate away from their previously notified 'best estimate' position and take an alternative course of action due to evolving nature of such situations. For example, a safety concern with the asset could be subsequently identified, requiring the interconnector to de-load.</p> <p>Based on the current wording of clause OC2.5.1.(b), deviating away from the best estimate position provided in a Space Weather Output Usable Declaration would be a Grid Code non-compliance, which Eleclink believe is unreasonable.</p>
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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 type="checkbox"/> Yes
		<input type="checkbox"/> No
		Eleclink have no view on whether the legal wording is best suited to OC2 or BC1.
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 type="checkbox"/> Yes
		<input type="checkbox"/> No
		Eleclink have no view.
9	As currently drafted, there is no change to BC1, however, do you	<input type="checkbox"/> Yes
		<input type="checkbox"/> No

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	believe the changes as proposed in OC2 would have an impact on EBR Article 18 terms and conditions?	Eleclink have no view.
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