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## Workgroup Consultation Response Proforma

### GC0103: The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Codes

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 **12 June 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](mailto:grid.code@neso.energy) or [claire.goult@neso.energy](mailto:claire.goult@neso.energy)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Mike Kay	
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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input 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

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**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 licence\* 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:**

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- 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.

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.

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**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 and/or any potential alternatives better facilitate the Applicable Objectives versus the current baseline??	<p>Mark the Objectives which you believe each solution better facilitates than the current baseline:</p> <table border="1"> <tr> <td>Original</td> <td> <input checked="" type="checkbox"/>i   <input checked="" type="checkbox"/>ii   <input checked="" type="checkbox"/>iii   <input type="checkbox"/>iv   <input type="checkbox"/>v  <input type="checkbox"/>None </td> </tr> </table> <p>In terms of iii, which licensee does the objective apply to? NESO or TOs?</p>	Original	<input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None
Original	<input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input 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>Not as things stand – this modification should also resolve the possible confusion and overlaps with the definition and use of the term Technical Standard. Please see my further comments in the Annex below.</p>		
3	Do you have any other comments?	No		
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 <a href="#">Workgroup Consultation</a> Section) <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>		
5		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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	Does the draft legal text satisfy the intent of the modification?	But it can be improved – I have included my suggestions.
6	Do you agree with the Workgroup's assessment that the modification <b>does not</b> 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	As set out at the bottom of page 12 of the consultation the three GB TOs have prepared a draft "Transmission Owners Relevant Electrical Standards" which can be found at <b>Annex 03</b> . Do you have any views on that document that you'd like to share? <b>[Please note any comments to this question will</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		The draft AES refers to itself as RES, but this should probably be AES.

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	<b>be provided to the TOs and will not be addressed by this Workgroup].</b>	
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## Annex

It seems that the definition of Technical Standard overlaps with both RES and AES – and I have a concern that the necessary full list of Technical Specifications (see CC6.2.1.2.b below) is not being maintained by the Company. And arguably this should probably be the TOs duties.

The following definitions are relevant.

### European Specification

A common technical specification, a British Standard implementing a European standard or a European technical approval. The terms "common technical specification", "European standard" and "European technical approval" shall have the meanings respectively ascribed to them in the Regulations.

### Regulations

The Utilities Contracts Regulations 1996, as amended from time to time.

### Technical Specification

In relation to Plant and/or Apparatus,

- (a) the relevant European Specification; or
- (b) if there is no relevant European Specification, other relevant standards which are in common use in the European Community

Technical Specification is used a few times throughout the Grid Code. Mainly I think it's OK as is - but for example, I don't think this is necessarily appropriate going forward without further consideration:

*CC 6.2.1.2.b **The Company** shall at all times maintain a list of those **Technical Specifications** and additional requirements which might be applicable under this CC.6.2.1.2 and which may be referenced by **The Company** in the **Bilateral Agreement**. **The Company** shall provide a copy of the list upon request to any **User**.*

It seems that NESO is requiring all plant at a User's site to comply with Technical Specifications. Additionally for their plant in the busbar protection zone they have to comply with the Electrical Standards. Is this what is appropriate and intended?