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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 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 or claire.goult@neso.energy

Respondent details	Please enter your details	
Respondent name:	Garth Graham	
Company name:	SSE Generation	
Email address:	garth.graham@sse.com	
Phone number:	01738 456000	
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 checked="" 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 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;

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- 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 checked="" type="checkbox"/>iv <input checked="" type="checkbox"/>v <input type="checkbox"/>None </td> </tr> </table> <p>Yes, the Original does better facilitate all five Applicable Objectives for the reasons we set out in the proposal form (as shown on pages 19–22 of the consultation document) which, for the sake of brevity, we don't repeat here.</p>	Original	<input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input checked="" type="checkbox"/> v <input type="checkbox"/> None
Original	<input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input checked="" type="checkbox"/> v <input type="checkbox"/> None			
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>This proposal was first raised in the summer of 2017, so any further delay would mean that realising the benefits (to GB consumers, in the form of lower prices) from this modification would be put off even further, leading to worse outcomes for GB consumers. The proposed implementation date is 10 Business Days after an Authority decision. We support that implementation approach</p>		
3	Do you have any other comments?	<p>As we have evidenced to the Workgroup; by reference to the 'ABC' example (on pages 6–8 of the consultation document), the Winsor Review (on pages 9–12 of the consultation document) and Authority & Harmonisation (on pages 13–15 of the consultation document) including the reference to the GC0117 'minded to'</p>		

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		document; the benefit of this modification is, in our view, beyond contestation.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No <div>Click or tap here to enter text.</div>
5	Does the draft legal text satisfy the intent of the modification?	<input type="checkbox"/> Yes <input type="checkbox"/> No <div>Click or tap here to enter text.</div>
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 <div></div>

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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <div>Annex 03 Draft Transmission Owners Relevant Electrical Standards</div>
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<p>“Transmission Owners Relevant Electrical Standards” which can be found at Annex 03. Do you have any views on that document that you’d like to share? [Please note any comments to this question will be provided to the TOs and will not be addressed by this Workgroup].</p>	<ul style="list-style-type: none"> - The proposed Annex to the General Conditions Part II (a): please clarified that this [(a)] is applicable in all Transmission Areas (similar to the wording in (b) that’s just below (a) on the page) in order to ensure it conform with the Winsor Review requirements. - Reference is made to the <u>relevant</u> standards and <u>Relevant</u> Electrical Standards. It should be noted that based on the new definition to be introduced into the Grid Code by GC0103, this would be “<u>Applicable</u> Standards” and “<u>Applicable</u> Electrical Standards” - For the avoidance of doubt, please clarify that the scope (who it applies to) of this combined (single, GB wide) specification/standard is the same as the previous (three) separate region specific standards; i.e. applicable to all “<i>apparatus owned by the User within the interface zone</i>” anywhere in GB. - Please clarify what is meant by “<i>does not apply to Apparatus owned by the User and connected to Apparatus owned by other Transmission Licensees</i>”. In that circumstance, what would apply (and how does it conform with the Winsor Review requirements)? - The wording in the proposed standard states “<i>The requirements of this document do not apply to Apparatus which are installed by the User to be adopted by the TO.</i>” Please specify (in that circumstance) what
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