

Public

Ref: FOI/25/149

National Energy System Operator
Faraday House
Gallows Hill
Warwick
CV34 6DA

InformationRights@neso.energy
www.neso.energy

19 November 2025

Dear requester

Request for Information

Thank you for your request for information which we received on 22 October 2025. Your request has been considered under the Environmental Information Regulations 2004 (EIR).

Request

You asked us:

Under the Environmental Information Regulations 2004, I am requesting information concerning NESO's monitoring and enforcement of Grid Code compliance since 2019, noting that following the 2019 blackout NESO announced it would implement 5-yearly re-testing of the Grid Code compliance of connected generators. Please provide, for each calendar year from 2019 to the present (or the first year in which the new policy was implemented), the following information:

1. *Compliance monitoring and testing activity*
 - *The number of generation or storage sites whose Grid Code compliance has been tested, audited or re-assessed by NESO (including tests under the Operational Notification and Compliance Process and the new five-yearly Compliance Repeat Plan introduced by modification GC0141).*
 - *The number of sites found to be non-compliant in whole or in part, and a brief description of the nature of those non-compliances (e.g. frequency response, reactive power capability, fault-ride-through performance, model validation, etc).*
 - *The number of sites for which NESO has issued Limited Operational Notices, rectification plans, or other restrictions as a result of non-compliance findings.*

2. *Follow-up and enforcement outcomes*

- *Any information held on rectification actions, timescales, or confirmation of restored compliance following NESO's findings.*
- *Any financial or operational penalties, referrals to Ofgem, or other formal enforcement actions arising from non-compliance with the Grid Code during this period.*
- *Whether any aggregated compliance statistics are compiled or published internally (for example, for the NESO board or Ofgem).*

3. *Policy or procedural documentation*

- *The most recent version of any internal procedure, methodology, or guidance describing how NESO plans and conducts Grid Code compliance audits or monitoring, including for existing plant beyond initial connection testing.*

Our response

We confirm that we hold information in scope of your request.

1. Compliance monitoring and testing activity

- The number of generation or storage sites whose Grid Code compliance has been tested, audited or re-assessed by NESO (including tests under the Operational Notification and Compliance Process and the new five-yearly Compliance Repeat Plan introduced by modification GC0141).***
- The number of sites found to be non-compliant in whole or in part, and a brief description of the nature of those non-compliances (e.g. frequency response, reactive power capability, fault-ride-through performance, model validation, etc).***
- The number of sites for which NESO has issued Limited Operational Notices, rectification plans, or other restrictions as a result of non-compliance findings.***

The latest version of the Grid Code can be accessed via the NESO website: [The Grid Code | NESO](#).

- The provisions contained in CP.5 to CP.7 of the Grid Code detail the process to be followed in order for a GB Code User's Plant and Apparatus to become operational. This process includes the requirements that must be met for the Energisation Operational Notification (EON), Interim Synchronising Operational Notification (ION) and Final Operational Notification (FON) to be issued.
- Section CP.8. sets out the requirements for the Compliance Repeat Plan.
- Section CP.9 sets out the requirements in relation to non-compliance (for existing connections) that result in a Limited Operational Notification (LON).

New connections

Information on the Operational Notification and Compliance Process (ONCP) facilitated by NESO is available on this webpage: [Compliance Process | National Energy System Operator](#). The ONCP includes the requirements of the Compliance Processes section of the Grid Code and the specific requirements of Bilateral Agreements.

All new generators are required to demonstrate compliance with the Grid Code before a Final Operational Notice is issued.

213 FONs have been issued for generation or storage sites from 2019 to the date of this response.

Existing connections

Information on the Code Modification referred to in your request is available here: [GC0141: Compliance Processes and Modelling amendments following 9th August Power Disruption | National Energy System Operator](#).

The GC141 modification approved by Ofgem on 12 December 2022 requires all users to submit a compliance statement, self-certification of compliance and updated planning and forecast data every 5 years. NESO will notify users no later than 4 years and 6 months after the date their FON was issued that confirmation of continued compliance as per the requirements of the Grid Code and their Bilateral Connection Agreement is required. If no data is received by the 5th Calendar year of the user having received a FON, NESO will consider the user to be non-compliant and therefore issue a Limited Operational Notification (LON) as per CP.9 of the compliance process.

A copy of the 'Compliance Repeat Plan – Guidance Notes' (May 2025) is provided with this response.

Compliance revalidation in accordance with the Compliance Repeat Plan has been completed for 20 sites. Compliance revalidation is in progress for another 28 sites.

No sites with a completed compliance revalidation through the Compliance Repeat Plan have been found to be non-compliant.

The Compliance Repeat Plan is not the only way in which NESO may be made aware that an existing connection site is non-compliant with the Grid Code. Customers that have been issued a FON and become aware of non-compliance (or suspected non-compliance) against any of the requirements of the Grid Code must notify NESO immediately through the [Non-Compliance Self-Reporting \(NCSR\) Process](#). Non-compliance can also be reported by Transmission Owners.

From 2019 to the date of this response, 8 Limited Operational Notifications (LONs) have been issued due to non-compliance with the Grid Code. LONs have been issued due to non-compliance with Grid-Code CP.8.2, specifically in relation to Reactive Power Non-Compliance, Unstable Oscillations, Frequency event and Model Issues.

2. Follow-up and enforcement outcomes

- a. Any information held on rectification actions, timescales, or confirmation of restored compliance following NESO's findings.**
- b. Any financial or operational penalties, referrals to Ofgem, or other formal enforcement actions arising from non-compliance with the Grid Code during this period.**
- c. Whether any aggregated compliance statistics are compiled or published internally (for example, for the NESO board or Ofgem).**

Of the 8 sites issued a LON for non-compliance since 2019:

- 3 sites have resolved the issues, and a FON has been reissued
- 2 sites remain on a LON
- 2 sites have been disconnected and projects terminated.

CP9 of the Grid Code provides information on the timescales of a LON.

The EIR requires a public authority to provide recorded information held at the time of the request (unless an exemption or exception applies). NESO does not hold recorded information in scope of Q2b or 2c. However, for information:

- NESO does not issue financial penalties in relation to non-compliance with the Grid Code.
- Grid Code CP 9.5.2 and CP10 provide information on derogations i.e., the process by which a User may be referred to Ofgem if they are unable to resolve an issue within the time scales allowed for when a LON is issued.
- NESO does not and is not required to compile statistics on compliance with the Grid Code.

The exception at Regulation 12(4)(a) of the EIR allows us to refuse a request or parts of a request where we do not hold the information at the time when a request is received. We are not required to create new information in order to respond to an EIR request. All EIR exceptions are subject to a public interest test (PIT) however the Information Commissioner's Office (ICO) recognises that it is not possible to carry out a meaningful PIT where information is not held.

3. Policy or procedural documentation

- ***The most recent version of any internal procedure, methodology, or guidance describing how NESO plans and conducts Grid Code compliance audits or monitoring, including for existing plant beyond initial connection testing.***

The 'Compliance Repeat Plan – Guidance Notes' (May 2025) is enclosed with this response. A link to the Non-Compliance Self-Reporting (NCSR) Process has been provided in response to question 1.

This concludes our response to your request.

Next steps

If you are dissatisfied with our handling of your request, you can ask us to review our response. If you want us to carry out a review, please let us know within 40 working days and quote the reference number at the top of this letter. You can find our procedure here: [Freedom of Information and Environmental Information Regulations | National Energy System Operator](#). The ICO's website also provides guidance on the internal review process: [What to do if you are dissatisfied with the response | ICO](#).

If you are still dissatisfied after our internal review, you can complain to the Information Commissioner's Office (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website: www.ico.org.uk/foicomplaints. Alternatively, they can be contacted at: Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Thank you for your interest in the work of the National Energy System Operator (NESO).

Regards,

The Information Rights Team, National Energy System Operator (NESO)

Compliance Repeat Plan- Guidance Notes

8th May 2025

GC141- Compliance Processes and Modelling amendments – Guidance Notes

Contents

Foreword	3
Introduction.....	4
Grid Code Compliance.....	5

GC141- Compliance Processes and Modelling amendments – Guidance Notes

Foreword

These Guidance Notes have been prepared by the National Grid Electricity System Operator (NESO) to describe to Generators and other Users on the system how the Grid Code Compliance Repeat Plan is intended to work.

Throughout this document National Grid refers to National Energy System Operator (NESO) unless explicitly stated otherwise. These Guidance Notes are prepared, solely, for the assistance of Generators who have already been issued a Final Operational Notification (FON) through the compliance process. In the event of dispute, the Grid Code and Bilateral Agreement documents will take precedence over these notes.

These Guidance Notes are based on the Grid Code, Issue 6, Revision 16, effective from the 05 January 2023. They reflect the changes brought about by Grid Code workgroup modification GC0141 as approved by the regulator on 12th December 2022.

The modification was introduced on the back of the power disruption that occurred on the 9th of August 2019, with the intention of making the compliance process more robust.

The Electricity Customer Connections Manager (see contact details) will be happy to provide clarification and assistance required in relation to these notes and on Grid Code compliance issues. NESO welcomes comments including ideas to improve the compliance process while maintaining the level of confidence.

For further information please refer to our FAQ's which can be found on our website.

Feedback should be directed to the NESO Electricity Connection Compliance team at box.ecc.compliance@neso.energy

Disclaimer: This document has been prepared for guidance only and does not contain all the information needed to comply with the specific requirements of a Bilateral Agreement with NESO. Please note that whilst these guidance notes have been prepared with due care, NESO does not make any representation, warranty or undertaking, express or implied, in or in relation to the completeness and or accuracy of information contained in these guidance notes, and accordingly the contents should not be relied on as such.

GC141- Compliance Processes and Modelling amendments – Guidance Notes

Introduction

The events of 9th August 2019 unfolded when a transmission circuit faulted, and fault clearance caused unexpected and significant losses of Users' Plant and Apparatus. The consequence of this high level of generation loss led to the first stage of the low frequency demand disconnection scheme operating, which then led to approximately one million customers losing their electricity supply. Both Ofgem and the Government's Department for Business, Energy & Industrial Strategy (BEIS) investigated, reviewed and published reports with actions on the incident. This modification aims to address the concerns raised in Action 3 of the Ofgem Rep rt_3 and Action 2 of the BEIS report. Both Actions are identical and required, NESO in consultation with large generators and transmission owners, to review and improve the compliance testing and modelling processes for new and modified generation connections, particularly for complex systems. One of the modifications introduced to address the actions are for generators to confirm their compliance every 5 years called as a compliance repeat plan.

GC141- Compliance Processes and Modelling amendments – Guidance Notes

Grid Code Compliance

Compliance Repeat Plan (CP 8)

The NESO considers that whilst Users consider each minor modification to their Plant and Apparatus in isolation, it may not be apparent that the overall performance of the Plant and/or Apparatus in question has changed over its lifetime because of the accumulation of these small changes. Therefore, in relation to grid code compliance part the GC141 modification all users will be required to submit a compliance statement, self-certification of compliance and updated planning and forecast data every 5 years.

The Process will be triggered by NESO via a letter 6 months prior to the 5-year anniversary of having achieved a FON. The letter will outline the dates in which NESO expect feedback in line with CP 8 of the Compliance Process.

In the instance a user has been on a LON and received a new FON then the date will be calculated from the latest FON that has been issued.

Once contact has been made with the customer the compliance team will schedule a meeting with the user to clarify the process and discuss any potential issues.

The data will be submitted in line with the current compliance process, through the DRC Portal and inline with the guidance flowcharts.

The data will be sent for review, and feedback will be provided within 8 weeks.

Once data is received and approved, NESO will send the user confirmation via a letter to advise compliance is passed and no further action is required. The letter shall include the date of the next review.

A diagram showing the process flow can be found in Appendix 1 of this document.

GC141- Compliance Processes and Modelling amendments – Guidance Notes

Data Required (CP.8)

- Relevant Planning Data: This will be in line with what was submitted in preparation to get the FON originally. The data should be accompanied with a cover sheet highlighting any changes or key messages that are relevant to the connection. Refer to Appendix 2 for a table on the planning data requirement.
- A completed Compliance statement: This will be reviewed by an engineer and if require any follow up meetings will be arranged to discuss further.
- A user Self certification certificate – A signed proforma confirming Grid Code compliance in full, to be completed and sent back to NESO.

Older Sites

NESO recognise that some older sites may not have all the data available to send for review. If this is the case NESO will deal with such sites on a case-by-case basis. The aim will be to work with the user to see how we can best demonstrate compliance for the site in question using an appropriate compliance statement.

No Data Received

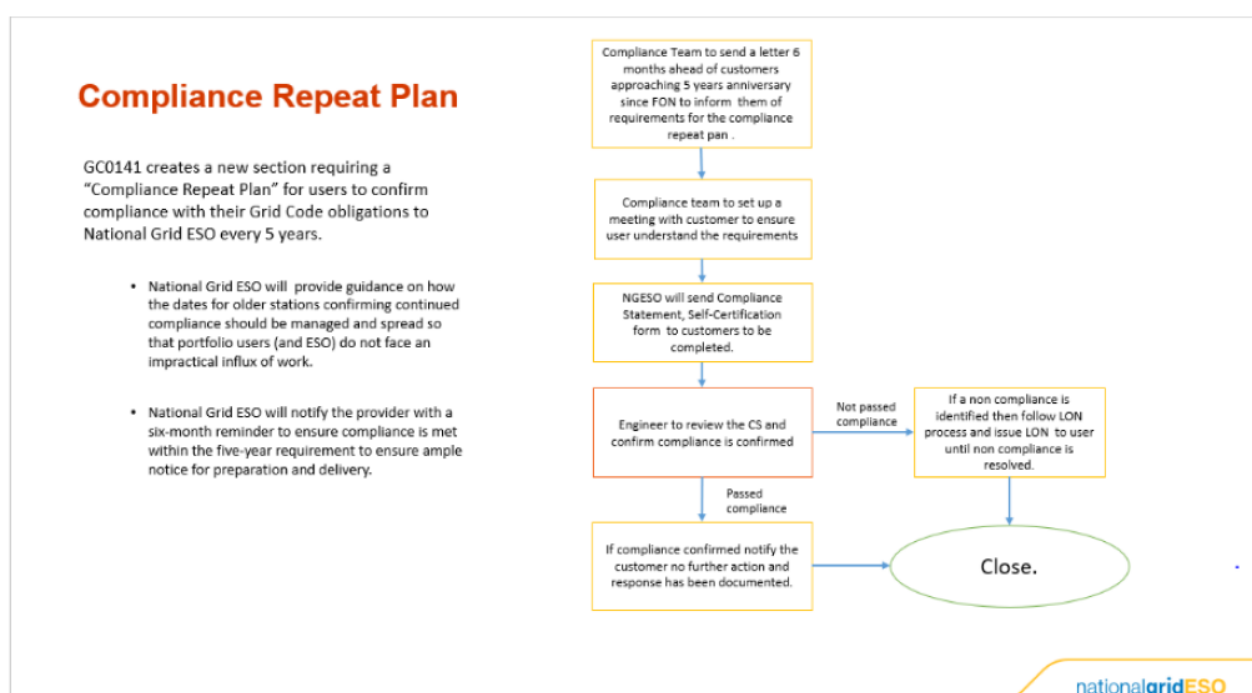
NESO will notify the user no later than 4 years and 6 months after the final Operational Notification that confirmation of continued compliance as per the requirements of the Grid Code and their Bilateral Connection Agreement.

If upon request no data is received by the 5th Calendar year of the user having received a FON, NESO will consider the user to be non-compliant and therefore issue a Limited Operational Notification (LON) as per CP.9 of the compliance process.

GC141- Compliance Processes and Modelling amendments – Guidance Notes

Appendix 1

Process Flow:



GC141- Compliance Processes and Modelling amendments – Guidance Notes

Appendix 2

Planning Data Requirement:

DRC.6.2 The **Schedules** applicable to each class of **User** are as follows:

<u>User</u>	<u>Schedule</u>
Generators with Large Power Stations	1, 2, 3, 4, 9, 14, 15, 16, 19
Generators with Medium Power Stations (see notes 2, 3, 4)	1, 2 (part), 9, 14, 15, 19
Generators with Small Power Stations directly connected to the National Electricity Transmission System	1, 6, 14, 15, 19
Generators undertaking OTSDUW (see note 5)	18, 19
All Users connected directly to the National Electricity Transmission System	5, 6, 9
All Users connected directly to the National Electricity Transmission System other than Generators	10,11,13,17
All Users connected directly to the National Electricity Transmission System with Demand	7, 9
A Pumped Storage Generator , a Generator in respect of one or more Electricity Storage Modules and an Externally Interconnected System Operator and Interconnector Users	12 (as marked)
All Suppliers	12
All Network Operators	12
All BM Participants	8
All DC Converter Station owners	1, 4, 9, 14, 15, 19