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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>	Alan Creighton	
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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 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 type="checkbox"/>v  <input type="checkbox"/>None </td> </tr> </table> <p>Click or tap here to enter text.</p>	Original	<input checked="" type="checkbox"/> i <input checked="" 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 checked="" 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 checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Northern Powergrid is supportive of the principle of introducing a harmonised set of standards.</p>		
3	Do you have any other comments?	Please see our response to Question 5.		
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 Section</a>)  <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>		
5	Does the draft legal text satisfy the intent of the modification?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>We have provided detailed comments on the Glossary and Definitions and on the General Conditions draft legal text. As drafted the legal text does not meet what</p>		

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		<p>we understand to be the intent of the document. In summary our main concerns are:</p> <ol style="list-style-type: none"> <li>1 It is unclear to us as to which category of Users would need to comply with the different types of standards / specifications (i.e. Electrical Standard, Technical Specification, Relevant Electrical Standard and Applicable Electrical Standard).</li> <li>2 It is also unclear to us when such standards / specifications would apply e.g. for new Connection Points or new plant installed as a modification to an existing Connection Point.</li> <li>3 Our expectation was that for all CUSC Modifications Offers issued after the implementation date, the Applicable Electrical Standards would apply to new plant and apparatus irrespective of whether the User is a GB Code User or a EU Code User. The legal text indicates that the Relevant Electrical Standards would continue to be applicable to GB Code Users.</li> <li>4 We understand that the intention is not to apply either an updated Relevant Electrical Standard or the new Applicable Electrical Standard retrospectively. We agree with this.</li> <li>5 There is a lack of clarity as whether a User's obligation to comply with a particular standard is set out in the CUSC (via their Bilateral Agreement) or the Grid Code. As drafted there is likely to be a conflict between proposed Grid Code obligations and CUSC Bilateral Agreement obligations. We are of the view that the required set of standards should be set out in only in the CUSC Bilateral Agreement as that is a bespoke</li> </ol>
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		<p>agreement that can be tailored to the Connection Point and reflect the different standards that might be applicable to different plant items at a Connection Point which were installed at different points in time.</p> <p>6 As a principle, any User that needs to comply with either the Relevant Electrical Standard or Applicable Electrical Standard should have the opportunity to range a change. We are not convinced the proposed legal text does this. For example GC11.1 means that DNO with a modification at an existing Connection Point with a Completion Date, in say 2027, i.e. after the GC0103 implementation date, would need to comply with the Relevant Applicable Standard, but unable to raise a change to them.</p> <p>7 The proposal not to include a list of the new Applicable Electrical Standard in the Grid Code does not facilitate visibility or transparency.</p> <p>Attached are marked up versions of Glossary and Definitions and the General Conditions, which form an integral part of our consultation response.</p> <p>We would be willing, once the intent of the modification is clear, to assist the workgroup to draft the legal text so that the intent was clearly codified.</p>
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	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

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	and conditions held within the Code?	
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### 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 be provided to the TOs and will not be addressed by this Workgroup].</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We have started to review the proposed document and have included a version with some initial comments on the first few pages. These generally relate to areas where further clarification would help. We will participate fully in the appropriate Electrical Standards governance process assuming that GC0103 is approved by Ofgem. However given the length of the document and its scope, which covers multiple areas of SME expertise, we think that it would be helpful to circulate the draft for comment before following the Grid Code Electrical Standards governance process to allow more time for engagement with Users who will need to comply with the new Applicable Electrical Standard.</p>
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