

Public

Code Administrator Consultation Response Proforma

GC0139: Enhanced Planning–Data Exchange to Facilitate Whole System Planning

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 **06 February 2026**.

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

Respondent details	Please enter your details	
Respondent name:	Roddy Wilson	
Company name:	SSEN Transmission	
Email address:	Roddy.Wilson@SSE.com	
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 type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

Public

(Please mark the relevant box)	<input checked="" type="checkbox"/> Non-Confidential (<i>this <u>will be shared</u> with industry and the Panel for further consideration</i>)
	<input type="checkbox"/> Confidential (<i>this will be disclosed to the Authority in full but, unless specified, <u>will not be shared</u> with the Panel or the industry for further consideration</i>)

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, (for consultation question 4) 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;

Public

- 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.

Please express your views in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions

Public

1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives against the current baseline.	<p>Mark the Objectives which you believe the proposed solution better facilitates than the current baseline:</p> <table border="1"> <tr> <td data-bbox="598 495 853 616">Original</td><td data-bbox="853 495 1417 616"> <input checked="" type="checkbox"/>i <input 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>It is our view that GC0139 represents an improvement of current arrangements by formalising a more consistent and structured approach to planning data exchange. In particular, the move from fragmented schedules and bespoke requests towards routine, standardised Power System Models, structured using CIM, supports improved transparency, comparability, and whole-system coordination.</p> <p>We consider that the proposal better supports the Applicable Grid Code Objectives by establishing a clearer framework for how planning information is exchanged between Network Operators, NESO, and Transmission Owners, subject to appropriate governance around data quality, assumptions, and version control.</p> <p>Click or tap here to enter text.</p>	Original	<input checked="" type="checkbox"/> i <input 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 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</p> <p><input type="checkbox"/>No</p> <p>We support the proposed implementation approach and timescales in principle. The proposed January 2027 implementation date, with preparation during 2026, appropriately reflects the scale of change involved and the need for industry readiness.</p> <p>Timely visibility of consequential STC modification activity alongside GC0139 would support effective coordination and implementation planning. Early clarity on final specifications, guidance, and governance arrangements during the transition period will help support effective understanding, assurance, and use of NESO-provided models within existing planning and assessment processes.</p>		

Public

3	Do you have any other comments?	<p>We note that the proposal categorises the expected impact on Transmission Owners as high. While GC0139 does not introduce new submission obligations for Transmission Owners, this classification appears to reflect the material change in the form, timing, and standardisation of planning information provided to TOs, as well as increased dependency on upstream Network Operator inputs and NESO system integration.</p> <p>In this context, we consider it important that appropriate governance arrangements are in place to support transparency of assumptions, version control, and clarity on the treatment of incomplete or late inputs, particularly where routine models are relied upon across multiple planning and assessment processes and may be subject to subsequent clarification or update. Clear articulation of roles and responsibilities across Network Operators, NESO, and Transmission Owners would also support effective implementation and ongoing coordination.</p> <p>We also note that potential cost impacts on Transmission Owners associated with maintaining and interfacing with the data exchange model have been raised during Workgroup discussions, as documented in the Workgroup meeting and summary papers. However, these implications do not appear to be reflected in the cost information presented in the Workgroup Report. Recognition of such considerations within the overall implementation landscape would support a more comprehensive understanding of impacts on Transmission Owners.</p>
4	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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We do not identify any material impact on EBR Article 18, noting that GC0139 relates to the exchange of planning data and models and does not affect electricity balancing markets or cross-border trade arrangements.</p>