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## Second Code Administrator Consultation

### GC0164: Simplification of Operating Code No.2

**Overview:** This modification seeks to help Users to clearly identify their obligations under Operating Code No.2 (OC2) by making it more accessible, easy to navigate and understand. This is the first modification resulting from the Alignment, Simplification and Rationalisation Workstream (ASRW) of the Digitalised Whole System Technical Code project.

#### Modification process & timetable

1	<b>Proposal Form</b> 12 October 2023
2	<b>Workgroup Consultation</b> 07 June 2024 – 08 July 2024
3	<b>Workgroup Report</b> 20 November 2024
4	<b>Second Code Administrator Consultation</b> 27 February 2026 – 27 March 2026
5	<b>Second Draft Final Modification Report</b> 15 April 2026
6	<b>Final Modification Report</b> 05 May 2026
7	<b>Implementation</b> 10 BD after Decision

**Have 5 minutes?** Read our [Executive summary](#)

**Have 100 minutes?** Read the full second Code Administrator Consultation

**Have 180 minutes?** Read the full second Code Administrator Consultation and Annexes

**Status summary:** On 25 September 2025, the Panel reviewed feedback from the Second Code Administration Consultation and requested the Workgroup to revise issues raised in the modification legal text before issuing a second consultation. The Workgroup have addressed this and are now consulting on this proposed change.

**This modification is expected to have a: Low impact** on Restoration Service Providers, Generators, Interconnector Owners, Transmission Owners, Non-Embedded Customers, Network Operators and The National Energy System Operator (NESO)

**Modification drivers:** Efficiency and Transparency

<b>Governance route</b>	Standard Governance modification assessed by a Workgroup	
<b>Who can I talk to about the change?</b>	<b>Proposer:</b> Frank Kasibante, NESO <a href="mailto:frank.kasibantel@neso.energy">frank.kasibantel@neso.energy</a>	<b>Code Administrator Chair:</b> Deborah Spencer <a href="mailto:deborah.spencer@neso.energy">deborah.spencer@neso.energy</a>
<b>How do I respond?</b>	Send your response proforma to <a href="mailto:grid.code@neso.energy">grid.code@neso.energy</a> by <b>5pm on 27 March 2026</b>	

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## Executive Summary

This modification seeks to simplify the text in Operating Code 2 (OC2) within the Grid Code to help Users identify and understand the obligations placed upon them.

### What is the issue?

OC2 within the Grid Code is widely agreed to be overly complex, poorly structured, and difficult for Users to navigate. The text makes it difficult for Users to understand and comply with current processes or understand their own and others' obligations. It also contains Appendices which are more logically located in other sections of the Grid Code.

### What is the solution and when will it come into effect?

**Proposer's solution:** To simplify the text in OC2 ensuring any amendments have no material impact on any User or the NESO.

**Implementation date:** 10 Business Days following the Authority decision.

### What is the impact if this change is made?

Ease of use of OC2 which will help Users understand and implement their obligations correctly and for the NESO to administer the Grid Code. It is believed also, that simplifying the text could encourage potential market entrants and innovative industry entrants.

**Workgroup conclusions:** The Workgroup concluded unanimously that the Original better facilitated the Applicable Objectives than the Baseline.

## Interactions

This modification has an interaction with the Electricity Balancing Regulation Article 18 Terms and Conditions due to changes to the Data Registration Code. There is also an interaction with <sup>1</sup>[GC0183](#), which makes changes to Operating Code 2.

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<sup>1</sup> [GC0183 Generator and Interconnector Availability During a Severe Space Weather Event](#)

## What is the issue?

### What is the defect the Proposer believes this modification will address?

The Grid Code<sup>2</sup> is widely agreed to be overly complex, poorly structured, difficult to navigate and complicated for Users to understand the obligations placed upon them. The Digitalised Whole System Technical Code (dWSTC) project<sup>3</sup> was set up to address some of the challenges of using the technical codes and is an opportunity to support the Energy Codes Reform (ECR) objective of code simplification.

The Operational Planning and Data Provision (OC2) is one section within the Grid Code where the complexity of the text could make it difficult for the reader to understand and comply with current processes or understand their own and others' obligations. It also contains Appendices which are more logically located in other sections of the Grid Code.

### Why change?

The dWSTC project was established to create an accessible and agile code system which is easier for both new and established market participants to access, understand and navigate than the current codes. The intention is to achieve this by removing inefficiencies in operating and maintaining the codes and encouraging new industry entrants. This will also set up the codes for further development to match the current pace of change in the industry.

The NESO received feedback from some parts of the industry, indicating that simplification of codes would deliver benefits to their organisations.

OC2 has been selected as an initial focus for simplification by the Alignment, Simplification & Rationalisation Workstream (ASRW) because it is both somewhat outdated and not among the most frequently utilised sections of the Code. This provides an ideal opportunity to test the application of simplification principles, such as streamlining and clarifying text, incorporating diagrams, adopting plain English, eliminating unnecessary duplication, refining definitions, and ensuring legal enforceability within the constraints of current resources. Moreover, simplifying OC2 is

<sup>2</sup> [The Grid Code](#)

<sup>3</sup> [Digitalised Whole System Technical Code](#)

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expected to enhance both existing and prospective Users' understanding of its requirements and provisions.

The GC0164 Workgroup established by the Grid Code Review Panel has developed the improvements proposed by the ASRW which are presented in this second Code Administrator Consultation for consideration. The proposal represents the first attempt to incorporate Grid Code simplifications flowing from the dWSTC project.

### What is the solution?

The modification is not intended to change any obligations placed on Users in the current OC2 text. The primary aim is to make OC2 easier to understand and apply. The process followed within this modification might prove helpful while considering streamlining and improving other codes. As part of the process of simplifying and rationalising OC2, extensive use was made of diagrams, avoiding duplication and using plain English. In addition, the opportunity was taken to move some sections of legal text out of OC2 and place them into other sections of the code where this was deemed as more appropriate. For example, the section on Generator Performance Charts has been moved from OC2 Appendix 1 into the Planning Code and any changes to definitions used in OC2 have been applied to the Glossary and Definitions. It is important here to note that where changes have been made to other sections of the Grid Code (e.g., the Planning Code and Glossary and Definitions) these are consequential updates because of the rationalisation of OC2 and do not attempt to rationalise or simplify the Planning Code or Glossary and Definitions. These changes are summarised in more detail below and the full legal text is available in **Annex 04**.

Collaboration with electricity industry stakeholders is essential in gaining a better insight as to what adds most value in attempting to simplify the Grid Code, and the formal modification of OC2 will be a key building block in the process. While every effort was made by the Proposer to engage industry stakeholders during this work, this was a challenge at times due to limited engagement, which may have been due to resource constraints and prioritisation of other work. The ASRW provided industry parties with the opportunity to provide early and detailed input towards the structure, content, breadth, and depth of redrafting OC2, and had developed some proposed legal text before the proposal entered this formal code modification process. The GC0164 Workgroup agreed to retain one set of definitions instead of creating a separate set for each simplified section of the Grid Code.

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The Proposer recommended that, in addition to the specific code modification, the Workgroup could consider how effective the process of proposal development has been, and whether it is suitable for wider adoption in relation to Grid Code alignment, simplification and rationalisation modifications.

Due to the nature of this modification, i.e. seeking to make OC2 clearer by reviewing and re-writing sections of the Code without altering the requirements, it has been challenging to clearly present the changes made. The tables below contain a summary, but a more detailed comparison of the current version of OC2 with that proposed is available in **Annex 05**.

### Summary of the changes to OC2

Section of OC2	What has changed
1. The Introduction, Objective, and Scope	Have been rewritten in plain English and the text has been rationalised.
2. Descriptions of procedures	Have been simplified and rationalised. Sections describing timelines have been amended to include diagrams to make them more comprehensible.
3. Text	Flowcharts have been used to remove repetitive text.  Overall text length (number of words) has been reduced
4. Generator performance charts	Are proposed to be relocated in the Planning Conditions
5. All sections	Changes have been made to improve readability and make text more concise

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## Summary of changes to the Data Registration Code

Section of the Data Registration Code	What has changed
OC2 references	Have been updated
Schedule 1	Power Generating Module Performance Chart has been introduced.

## Summary of the Changes to the Planning Code

Section of the PC	What has changed
1. PC.A.3.2.2(f)	Sub item (vi) 'Generator Performance Chart(s) shall be in the format indicated in the Planning Code Appendix G' was added to introduce location of the charts in the Appendix G.
2. APPENDIX G	Introduced as new location of Performance Chart Examples

## Summary of the changes to the Glossary and Definitions

Section of the Glossary and Definitions	What has changed
National Electricity Transmission System	'NETS' has been added as an abbreviated form of the <b>'National Electricity Transmission System'</b> .

## What is the impact of this change?

Proposer's assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(i) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;	<b>Neutral</b>

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(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);	<b>Positive</b>  Users will find it easier to find information, saving time in determining compliance requirements.
(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;	<b>Neutral</b>
(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	<b>Neutral</b>
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements	<b>Positive</b>  A more usable version of OC2 will make it easier for Users to implement their obligations correctly and for the NESO to administer the Grid Code.  Establishing a streamlined modification process for code alignment, simplification and rationalisation will help deliver more wide-ranging efficiency improvements to the codes, including Energy Code Reform.



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Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories	
Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	<b>Positive</b> Clearer obligations and easier implementation of them will help improve system reliability.
Lower bills than would otherwise be the case	<b>Positive</b> Lower Grid Code administration overheads across the industry will help to reduce bills.
Benefits for society as a whole	<b>Neutral</b>
Reduced environmental damage	<b>Neutral</b>
Improved quality of service	<b>Positive</b> Simplification of OC2 will result in more efficient use in complying with and understanding OC2.

## Legal text

The legal text for this change can be found in **Annex 04**.

Please see the below table which indicates a summary of legal text changes with the interactions and additional changes required for if GC0183 is approved prior to a GC0164 decision.

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Legal text document	Summary of changes under GC0164	Additional changes if GC0183 is approved prior to GC0164 decision
Glossary and Definitions	Simplification of NETS definitions and change to references	Addition of definitions introduced under <a href="#">GC0183</a> (provided for context as these are referred to in OC2)
Operating Code 2	Complete change to document for simplification	Addition of text written in <a href="#">GC0183</a>
Operating Code 5	Change to references	N/A
Operating Code 7	N/A	Addition of text written in <a href="#">GC0183</a> including a change to a reference in this clause
Balancing Code 1	Change to references	Addition of text written in <a href="#">GC0183</a> including a change to a reference in this clause
Balancing Code 2	Change to references	N/A
European Compliance Processes	Change to references	N/A
General Conditions	Change to references	N/A
Data Registration Code	Addition of Power Generating Module Performance Chart and checkbox Change to references	N/A
Planning Code	Addition of Generator Performance Chart examples in Appendix G	N/A

## Workgroup considerations

### Workgroup Discussion ahead of the Workgroup Consultation

The Workgroup convened 12 times to discuss the perceived issue, detail the scope of the proposed defect, discuss the proposed solution, and assess the proposal in terms of the Applicable Code Objectives.

The modification initially followed the Standard Governance route, but it was agreed by the Authority after Workgroup 1 that GC0164 should proceed to a Self-Governance route. The Authority assessed the modification proposal and decided that the intended changes to OC2 bore no material impact to Grid Code Users.

Grid Code Panel members met on 25 January 2024 and agreed that GC0164 would follow the Self-Governance route and that the Terms of Reference should be updated accordingly. The Terms of Reference can be found in **Annex 02**.

Due to a proposed change to the Data Registration Code (DRC) highlighted during the first Code Administrator Consultation, the Grid Code Panel, directed the Code Administrator to retract the Self-Governance statement under GC.2.4.11 and advised that the modification would follow the Standard Governance route. Further details can be found in the Workgroup discussions following Panel send back section on page 18.

The Proposer delivered a presentation comparing the existing legal text with the revisions proposed by the Alignment, Simplification and Rationalisation Workstream (ASRW). Workgroup members undertook a detailed, page-by-page review of these suggested amendments, carefully evaluating each change to ensure it met the intended objectives. In cases where modifications were deemed to have potentially significant impacts, or where the original language was already sufficiently clear, the group elected to retain the existing text.

A member of the Workgroup raised concerns regarding the potential risks associated with altering or removing content from the existing OC2, cautioning that reducing detail might increase the risk of ambiguous interpretation. In response, the Proposer clarified that the primary objective was to streamline and clarify OC2's language, ensuring the text remains both concise and unambiguous.

A Workgroup member further emphasised the importance of considering the broader implications of any changes to definitions, particularly their potential impact on other sections of the Grid Code and related industry codes. The Proposer acknowledged this point, clarifying that there is no intention for the amendments to have a material effect

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elsewhere. Should the process of revising definitions prove too complex, the Proposer suggested that this task could be addressed separately at a later stage.

### Term of Reference (f) discussion

Workgroup members also discussed item (f) in the Terms of Reference “Consider whether it is appropriate to have two sets of Grid Code definitions, one set to use with OC2 and a second (existing) set to be used for all other parts of the Grid Code”. Workgroup members agreed that having two sets of Glossary and Definitions would cause confusion and therefore it was sensible to have one single set that covers the entire Grid Code.

### Legal Text Discussions

During legal text discussions in Workgroup meeting 4, a Workgroup member sought clarification regarding references to Generator Performance Charts in the newly created Appendix G section of the Planning Code.

The Proposer confirmed there was reference in OC2 regarding Generator Performance Charts, and that the key question was where in the Planning Code the reference should be introduced.

This was discussed and Workgroup members agreed that the Generator Performance Charts should be moved to a new Appendix G within the Planning Code. A new reference text was proposed and drafted in PC.A.3.2.2(f) as a result of the discussion.

A recommendation was put forward to include a legal text reference table previously distributed by the Proposer to the Workgroup, highlighting the changes made to OC2 in the Annexes. This addition was intended to enhance industry stakeholders’ understanding of the proposed modification. The Proposer agreed and subsequently prepared a comparative document outlining the differences between the current and revised versions of OC2. This resource aims to assist readers who were not directly involved in the GC0164 process in evaluating the changes in relation to the stated objectives. The reference table is available in **Annex 05**.

## Workgroup Consultation Summary

The Workgroup Consultation was held between 07 June – 08 July 2024 and received 3 responses. The full responses and a summary of the responses can be found in **Annex 06**.

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### **Applicable Objectives<sup>4</sup> Met:**

Respondent one believed the original proposal better facilitated Grid Code objectives (a), (b), (c) and (d).

Respondent two believed the original proposal better facilitated Grid Code objective (e).

Respondent three believed the original proposal better facilitated Grid Code objectives (a), (c) and (e).

**Implementation approach:** All three respondents supported the implementation approach.

**Alternatives:** None of the respondents wished to raise an alternative.

### **Have the changes to OC2 made it easier to understand than the existing version?:**

Respondents one and three agreed that the changes proposed had made it easier to understand than the existing version. Respondent two however advised that it was difficult to form a view.

### **Would the Grid Code obligation remain the same if this version was implemented?:**

Respondents one and three confirmed that the Grid Code obligation would remain unchanged. Respondent two noted that some requirements have been changed/removed, adding changes may not have been intentional and were due to editorial changes.

### **The Workgroup view is there should only be one set of Glossary and Definitions applicable to the entire Grid Code, do you agree?:**

Respondents two and three supported the view that a single, consolidated set of Glossary and Definitions should apply across the entire Grid Code, noting that the existence of multiple definitions for the same term would introduce unnecessary confusion. Conversely, respondent one disagreed, considering this approach a significant error that could impede the progress of the dWSTC project.

### **The Generators Performance Charts will move from the Operating Code to the Planning Code under this Proposal, do you agree with this change?:**

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<sup>4</sup> On 01 October 2024, the Electricity System Operator (ESO) was formally rebranded as the National Energy System Operator (NESO). Concurrently, the ESO Licence was updated, transitioning the objectives from alphabetical to Roman numeral enumeration.

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All respondents agreed with this change, one respondent added that there are some further areas of OC2 which relate to the Generator Performance Chart which could be moved into the Planning Code.

### **To help quantify the industry resources required to implement this type of change, the consultation asked respondents to indicate the number of hours spent reading and responding to the consultation:**

Respondent one advised it was difficult to quantify a number as they had spent more than one hundred hours overall working on the dWSTC project and GC0164 modification. Respondents two and three advised they had spent approximately 5 and 10 hours reading and responding to the consultation. Details of the responses and summary can be found in **Annex 06**.

## **Post Workgroup Consultation Discussion**

During the review of the legal text, several amendments were highlighted by a Workgroup member; the Proposer agreed to make the necessary changes and shared the updates with Workgroup members for their review.

## **Terms of Reference Overview**

### **a) Implementation and costs**

It was suggested that Workgroup members share details of the time and effort invested during the modification process, this information could then be taken into consideration when deciding on similar projects in the future.

The Workgroup Consultation received three responses regarding time and effort invested, with reported hours ranging from one to approximately one hundred, reflecting varying levels of involvement among respondents.

### **b) Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text**

A Workgroup member highlighted to the group that other areas within the Grid Code should be reviewed to ensure nothing has been missed, and updates were reflected correctly in OC2. The Proposer agreed to do a full review of the Grid Code and share their findings with members.

The Proposer had previously reviewed the Grid Code to ensure the suggested changes within the legal text would not have any adverse effect but agreed to do a further

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assessment. At a later meeting the Proposer advised Workgroup members that no issues were found after a second review.

- c) Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report

The Proposer engaged with industry through various forums to obtain feedback in relation to the OC2 changes. A Workgroup member highlighted that it was important that feedback be received by industry parties affected by the OC2 changes. It was agreed that the Proposer would attend the OC2 Forum and share the changes made to OC2 and request feedback. Workgroup members also agreed to assist by reaching out to relevant parties to request their input.

During the OC2 Forum on 24 September 2024, the Proposer shared the GC0164 documentation with the forum members. The request was for members to feedback via a questionnaire whether the suggested changes made the document easier to use for industry, those members who responded felt the revised OC2 changes were easier to follow.

The Chair explained that after reaching out to Industry, receiving feedback from Stakeholders at the OC2 forum and welcoming a new Workgroup member, Terms of Reference (c) had been fulfilled. The Workgroup members agreed and noted that the Proposer could not have done more to engage with industry to gain their feedback.

- d) Consider implications to sections linked to the Regulated Sections of the Grid Code

During discussions, a question was raised regarding Term (d), a member asked whether the implications on the Electricity Balancing Regulation (EBR) Terms and Conditions had been considered.

The Proposer explained that this was addressed in earlier Workgroup discussions and confirmed that GC0164 does not have any EBR implications. Another Workgroup member supported this view and added that the modification does not change the obligations within OC2 and should not have any implications.<sup>5</sup>

<sup>5</sup> During the Workgroup period, no issues were identified concerning the Electricity Balancing Regulations (EBR). However, during the First Code Administrator Consultation, it became apparent that an amendment to the Data Registration Code was necessary.

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- e) Consider whether the proposed redrafted OC2 is easier for stakeholders to read and understand and that the existing obligations on all parties set out in the current OC2 version have been retained.

During Workgroup discussions, it was agreed that although the Proposer had tried numerous times to engage with Stakeholders, further engagement was needed to ensure the redraft adequately addresses their concerns.

As set out in the Terms of Reference (e) the Proposer attended the OC2 Forum, sharing the suggested changes and requested feedback from members. Those members who responded agreed the redraft was easier to read and the obligations on all parties set out in the current OC2 had been retained. This was reiterated by Workgroup members during discussion through the modification process.

- f) Consider whether it is appropriate to have two sets of Grid Code definitions, one set to use with OC2 and a second (existing) set to be used for all other parts of the Grid Code.

The Proposer during Workgroup discussion advised that two sets of Grid Code definitions had been considered but was deemed impractical due to the potential confusion it would cause for readers. Workgroup members agreed noting that having two sets of definitions would contradict the overall objective of simplifying the code.

- g) Workgroup to assess and form a view whether there are material changes or not to the modification.

Workgroup members have reviewed the legal text changes and confirmed they agree there have been no material changes.

## First Workgroup Vote

The Workgroup met on 18 October 2024 to carry out their Workgroup Vote. The full Workgroup vote can be found in **Annex 07**.

The table below provides a summary of the Workgroup Members view on the best option to implement this change.

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*



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*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*

The Workgroup concluded unanimously that the Original better facilitated the Applicable Objectives than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	5

Following the changes to the legal text made after the Panel send-back, the Workgroup confirmed their Workgroup Vote at the meeting on 16 September 2025.

## First Code Administrator Consultation Summary

The first Code Administrator Consultation was issued on 02 December 2024, closed on 16 January 2025 and received 4 responses. The full responses can be found in **Annex 10** and a summary of the legal text queries raised can be found in **Annex 11**.

## First Panel recommendation vote

The first Draft Final Modification Report was submitted to the February 2025 Grid Code Review Panel for recommendation. The Panel considered the substantive changes in the legal text and agreed these should be reconsidered by the Workgroup, followed by a second Code Administrator Consultation.

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## Workgroup Discussions following Panel Send Back

The Workgroup reconvened 3 times following the Grid Code Review's Panel for them to reconsider the legal text changes raised in the Code Administrator Consultation.

At the Workgroup meeting held on 29 April 2025, Workgroup members considered the feedback received from the Grid Code Review Panel and confirmed that, due to a change now being required to the Data Registration Code (which is referenced in Annex GR.B Table 1), the modification has an interaction with the Electricity Balancing Regulation (EBR). The Workgroup provided this information to the Grid Code Review Panel in June 2025, and the Panel instructed the Code Administrator to retract the Self-Governance Statement under GR.24.11, meaning that the modification should proceed via the Standard Governance process.

All identified typographical and substantive issues were compiled and circulated to Workgroup members in a detailed spreadsheet for their review and input (**Annex 11**).

The Proposer explained that the review process involved going through the legal text and identifying typographical and substantive issues, emphasising the importance of having an independent Workgroup member review their assessment to ensure accuracy and objectivity.

The Workgroup agreed to go through the spreadsheet the Proposer had prepared, which listed the identified issues and their proposed resolutions. This collaborative review aimed to ensure that all necessary changes were accurately captured and addressed.

The following changes were made to the legal text following discussion by the Workgroup:

- **Restoration Contractors:** The Workgroup discussed the references to restoration contractors in the legal text. A Workgroup member clarified that restoration contractors could include Generators or Interconnector owners and agreed to ensure that the text accurately reflected this.
- **Generating Plant:** The Workgroup addressed the references to generating plant in the legal text and discussed the importance of using consistent terminology and agreed to use "Plant and/or Apparatus" to cover all relevant equipment.
- **Typographical Corrections:** The Workgroup identified and corrected various typographical errors in the legal text. This included ensuring proper punctuation, correcting references, and making sure that all text was clear and consistent.

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- Consistency and Clarity: The Workgroup emphasised the need for consistency and clarity in the legal text. They discussed the importance of using precise language and ensuring that all references and terminology were used consistently throughout the document.
- Diagram and chart issues: The Workgroup identified issues with diagrams and charts in the Planning Code, including missing lines and incorrect titles. The Proposer addressed these issues and also provided legal text within the Data Registration Code to ensure Users have a way of submitting information to NESO.

On 16 September 2025, the Workgroup met to finalise the legal text including the interaction with [GC0183](#) and confirm their Workgroup Vote.

### Interaction with GC0183

On 09 July 2025, NESO raised [GC0183: Generator and Interconnector Availability During a Severe Space Weather Event](#). This modification was identified to have an interaction with GC0164, due to proposed changes to OC2 (addition of clauses OC2.4.1.2.4 and OC2.5).

Following agreement of the GC0183 legal text on 10 September 2025, the GC0164 Workgroup met on 16 September 2025 to agree changes to the legal text which would be required if GC0183 was approved prior to GC0164.

Please see the full legal text in **Annex 04** which provides versions of legal text which both include and exclude the additional GC0183 text.

### Panel Send Back of the Second Code Administration Consultation

The Second Code Administrator Consultation was submitted to the Grid Code Panel on 25 September 2025 for their review. During this session, Panel members raised several questions and concerns regarding the consultation.

A Panel member highlighted issues relating to terminology, definitions, graphical presentations, and noted a lack of consistency, which impacted the clarity and overall comprehension of the documentation. Another Panel member expressed that the legal text could be confusing for stakeholders, particularly due to the existence of multiple versions considering the interaction with GC0183 and [GC0174](#). It was recommended that the Panel defer progression of the Second Code Administrator Consultation until formal

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decisions had been reached on GC0183 and GC0174, given that both modifications have implications for GC0164.

In response, the Panel Secretary recommended that members with concerns join the Workgroup to collaboratively address and resolve any outstanding matters, thereby ensuring all issues are fully understood. Consequently, the Grid Code Panel did not approve the progression of the modification until all points raised had been satisfactorily addressed.

The Proposer organised meetings with the concerned Panel members to discuss and resolve all issues raised. It was agreed that the subsequent Workgroup meeting would be scheduled following receipt of the Authority's decisions on GC0183 and GC0174, both of which have implications for GC0164.

Panel members confirmed their intention to attend the next Workgroup on 22 January 2026, where they would present their previous concerns and review the amendments made by the Proposer.

## Workgroup Discussions following Panel Send Back

The Workgroup discussed concerns raised by the Grid Code Panel members regarding the GC0164 modification, particularly the need to address additional feedback on the legal text and its interactions with GC0183 and GC0174. The legal text was updated to reflect Ofgem's recent decisions, and a revised timeline will be presented to the Grid Code Panel in January 2026.

The Workgroup addressed the concerns raised by the Grid Code Panel regarding the GC0164 modification, with particular focus on the need to incorporate additional feedback on the legal text and its interactions with GC0183 and GC0174. The legal text was duly updated to reflect the most recent decisions by Ofgem, and it was agreed that a revised timeline would be presented to Grid Code Panel in January 2026.

Key areas of discussion included ensuring that code simplification does not result in changes to obligations, enhancing the clarity and consistency of diagrams, eliminating duplication, and aligning terminology with the current Grid Code. The Workgroup reached consensus on specific revisions to formatting, diagrammatic structure, references to performance charts, and the correct integration of related modifications, while prioritising the preservation of the integrity of existing requirements. It was agreed that a further Workgroup would be needed to review these changes.

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On February 11, the Workgroup evaluated the inclusion of a space weather diagram in OC2, emphasising the importance of clarity and consistency. Diagram formatting was standardised and it was agreed that diagrams will be incorporated only where they enhance understanding.

In the Planning Code chart titles were revised to align with defined terms, and references were amended to specify all three chart types individually. The Workgroup decided to retain only two versions of diagrams tailored for different user groups and removed example charts from the DRC, preserving them exclusively in Appendix G. After these revisions, the Workgroup reaffirmed that their previously recorded vote remained the same after the updates to the legal text. The Workgroup agreed that all concerns raised had been resolved and the Second Code Administrator Consultation should be submitted to Grid Code Panel for review.

### Implementation date:

10 Business Days after Authority Decision

### Date decision required by:

As soon as possible.

### Implementation approach:

There are no system changes required as a result of this modification.

## Interactions

<input type="checkbox"/> CUSC	<input type="checkbox"/> BSC	<input type="checkbox"/> STC	<input type="checkbox"/> SQSS
<input type="checkbox"/> European Network Codes	<input checked="" type="checkbox"/> EBR Article 18 T&Cs <sup>6</sup>	<input checked="" type="checkbox"/> Other modifications	<input type="checkbox"/> Other

This modification has an interaction with the Electricity Balancing Regulation Article 18 Terms and Conditions due to changes to the Data Registration Code. There is also an interaction with [GC0183](#) and GC0174, which makes changes to Operating Code 2.

<sup>6</sup> If the modification has an impact on Article 18 T&Cs, it will need to follow the process set out in Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195) – the main aspect of this is that the modification will need to be consulted on for 1 month in the Code Administrator Consultation phase. N.B. This will also satisfy the requirements of the NCER process.

Public

## How to respond

### Code Administrator Consultation questions

- Please provide your assessment for the proposed solution against the Applicable Objectives versus the current baseline.
- Do you support the proposed implementation approach?
- Do you have any other comments?
- Do you agree with the Workgroup's assessment that the modification does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?
- Do you have any comments on the impact of GC0164 on the EBR Objectives?

Views are invited on the proposals outlined in this consultation, which should be received by 5pm on **27 March 2025**. Please send your response to [grid.code@neso.energy](mailto:grid.code@neso.energy) using the response pro-forma which can be found on the [modification page](#)

*If you wish to submit a confidential response, mark the relevant box on your consultation proforma. Confidential responses will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

### Acronyms, key terms and reference material

Acronym / key term	Meaning
ASRW	Alignment, Simplification and Rationalisation Workstream
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
DRC	Data Registration Code
dWSTC	Digitalised Whole System Technical Code
EBR	Electricity Balancing Regulation
ECR	Energy Codes Reform
NESO	National Energy System Operator
OC2	Operating Code No.2
PC	Planning Code
SQSS	Security and Quality of Supply Standards

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STC	System Operator Transmission Owner Code
T&Cs	Terms and Conditions

## Annexes

Annex	Information
Annex 01	GC0164 Proposal Form
Annex 02	GC0164 Terms of Reference
Annex 03	GC0164 ASRW Considerations
Annex 04	GC0164 Legal Text
Annex 05	GC0164 Legal Text Comparison Documents
Annex 06	GC0164 Workgroup Consultation and responses
Annex 07	GC0164 Workgroup Vote
Annex 08	GC0164 Action Log
Annex 09	GC0164 Attendance Record
Annex 10	GC0164 First Code Administrator Consultation Responses
Annex 11	GC0164 Summary of Legal Text queries from First Code Administrator Consultation