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## 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](mailto: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](mailto:grid.code@neso.energy)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Abbas Mahmood	
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<b>Phone number:</b>	07436 246103	
<b>Which best describes your organisation?</b>	<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 type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" type="checkbox"/> Other

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**I wish my response to be:**

(Please mark the relevant box)	<input checked="" type="checkbox"/> <b>Non-Confidential</b> ( <i>this <u>will be shared</u> with industry and the Panel for further consideration</i> )
	<input type="checkbox"/> <b>Confidential</b> ( <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

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**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;*
- 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.

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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		
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives against the current baseline.	Mark the Objectives which you believe the proposed solution better facilitates than the current baseline:
		<div>Original</div> <div> <input type="checkbox"/>i           <input type="checkbox"/>ii           <input type="checkbox"/>iii           <input type="checkbox"/>iv           <input type="checkbox"/>v             <input checked="" type="checkbox"/>None         </div>
		Click or tap here to enter text.
		The ENA consolidated response focuses on implementation timescales and delivery risks. It does not include a separate assessment of the proposed solution against the Applicable Objectives beyond those considerations.

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2	Do you support the proposed implementation approach?	<div data-bbox="614 421 694 454"><input type="checkbox"/> Yes</div> <div data-bbox="614 495 694 528"><input checked="" type="checkbox"/> No</div> <div data-bbox="614 645 1407 2016"> <p>The electricity networks consider that the proposed January 2027 implementation date is not realistically achievable due to the required development of CIM profiles, including extensions and deviations to CGMES 3.0 and LTDS CIM, and the associated DNO, TO and vendor implementation lead times.</p> <p>The networks propose that the first DNO submission under GC0139 (including all CIM and non-CIM data exchanges) should be made in January 2028, assuming NESO provides the required data to DNOs by September 2027. Both NESO and DNOs would continue existing Grid Code data exchange arrangements until the full GC0139 requirements have been implemented.</p> <p>The January 2027 implementation date presents significant delivery risks, including:</p> <ul style="list-style-type: none"> <li>• Lack of clear technical requirements and uncertainty in scope;</li> <li>• The need to develop and agree CIM extensions and a stable GC0139 profile, including alignment with LTDS;</li> <li>• Vendor readiness and tooling constraints;</li> <li>• Industry-wide CIM resource capacity pressures,</li> </ul> </div>
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		<p>particularly alongside LTDS submissions in 2026; and</p> <ul style="list-style-type: none"> <li>• Process, tooling, interoperability and boundary coordination challenges, including dependencies on eMIDS and sufficient time for testing.</li> </ul> <p>Without resolution of these issues and adequate time for profile development, vendor implementation and interoperability testing, a January 2027 implementation is unlikely to be achievable.</p>
3	Do you have any other comments?	<p>The electricity networks consider that the proposed January 2027 implementation date is not realistically achievable due to the required development of CIM profiles, including extensions and deviations to CGMES 3.0 and LTDS CIM, together with DNO, TO and vendor implementation lead times.</p> <p>The networks propose that the first DNO submission under GC0139 Grid Code modifications, including all CIM and non-CIM data exchanges, should be made in January 2028, assuming NESO provides the required data to DNOs by September 2027. Both NESO and DNOs would continue existing Grid Code data exchange arrangements until the full GC0139 requirements have been implemented.</p>

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		<p>This proposed timeline is subject to the following assumptions:</p> <ul style="list-style-type: none"> <li>• Timely recruitment of CIM experts to develop the GC0139 required CIM profiles and related artefacts;</li> <li>• The technical CIM requirements set in the proposed GC0139 legal text being accurate and acceptable to develop required CIM profiles;</li> <li>• Vendors' timely implementation of GC0139 CIM profiles; and</li> <li>• Successful CGMES v3.0 and GC0139 interoperability testing in accordance with the implementation programme.</li> </ul> <p>The networks consider that the current January 2027 implementation date presents significant delivery risks, including:</p> <ol style="list-style-type: none"> <li>1. Lack of clear technical requirements and uncertainty in scope Guidelines for CIM implementation are not yet clearly defined and require development. This includes uncertainty around required CIM objects, data granularity, modelling depth and necessary extensions. This lack of clarity leads to inconsistent interpretation across DNOs, difficulty in planning, and inability to accurately estimate resource and budget requirements. Without early,</li> </ol>
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		<p>comprehensive guidance developed by the ENA GC0139 CIM Working Group, DNOs cannot mobilise effectively, increasing the risk of misaligned implementations and delayed delivery.</p> <p>2. CIM extensions, profile definition and alignment with LTDS</p> <p>GC0139 implementation requires CGMES v3.0 extensions and deviations to be developed and agreed across DNOs, TOs and NESO. These must be finalised before vendors can implement solutions. There is also a key dependency on alignment with LTDS CIM work. Until a stable, agreed GC0139 CIM profile exists, including refreshed gap analysis against LTDS, technical development cannot begin.</p> <p>3. Vendor readiness and tooling availability</p> <p>CIM product vendors require early visibility of the final profile, clear development timelines and defined test windows. Vendors are already supporting LTDS development and may face constraints in resourcing GC0139 development in parallel. Vendor delays would directly impact DNO deliverability.</p> <p>4. Industry-wide resource capacity constraints</p>
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		<p>Stakeholders have identified significant pressure on internal resources, including limited CIM expertise, competing LTDS deadlines in 2026, uncertainty regarding GC0139 workload, and the risk of overstretching a small pool of CIM experts across Great Britain. GC0139 and LTDS reforms draw on the same scarce skills, creating substantial risk of missed milestones across both programmes.</p> <p>5. Process, tooling and boundary coordination challenges</p> <p>Once requirements are confirmed, DNOs will need to develop and adapt export and import functionality, internal model management, asset to CIM mapping logic, and undertake interoperability testing and trial model exchanges. Additional coordination challenges include management of Interface Boundary Point data jointly with TOs, dependency on the NESO eMIDS project which is not yet embedded into BAU, ongoing change control and governance, and uncertainties around tooling readiness and multiple test cycles. Significant operational setup is required, and insufficient time for testing makes January 2027 unrealistic.</p>
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		For these reasons, the networks do not support the proposed January 2027 implementation approach and consider January 2028, subject to the dependencies outlined above, to be a more realistic and deliverable timeline.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  The electricity networks 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. The networks' concerns relate solely to implementation timelines and delivery risks.