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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 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:	Borsu Shahnavaz	
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Which best describes your organisation?	<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

I wish my response to be:

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(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;

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- 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

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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="608 495 855 616">Original</td><td data-bbox="855 495 1417 616"> <input checked="" type="checkbox"/>i <input checked="" 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>Click or tap here to enter text.</p> <p>We support the direction of travel of the GC0139 Original Proposal as it delivers a step-change in data exchange, planning, and system visibility. Enhancing the UK's electricity network modelling and planning capabilities to address existing and future challenges and ensure informed decisions.</p>	Original	<input checked="" type="checkbox"/> i <input checked="" 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 checked="" 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 type="checkbox"/>Yes</p> <p><input checked="" type="checkbox"/>No</p> <p>UK Power Networks does not support the proposed implementation approach, as we do not consider the proposed implementation approach to be sufficiently defined or robust and potentially not even achievable at this stage. A number of key issues remain unresolved:</p> <ol style="list-style-type: none"> 1) The proposed implementation timeline does not appear achievable given the current development of the GC0139 full Common Interface Model (CIM)-based data exchange including extensions and deviations are yet to be defined. It is unclear when parties are expected to be fully compliant in practice, and whether the first mandatory use of the new requirements aligns with operational readiness of systems, tools and processes. 2) The proposed implementation does not include a defined trial or transition period. Experience from the Long Term Development Statement (LTDS) indicates that a phased approach incorporating data validation, parallel running, system operator comparison, and vendor testing is required to support a successful deployment. 3) Historical experience with Week 42 data exchange indicates variability in completeness and consistency. As a result, there is a risk that transitioning to a CIM-based 		

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		<p>data exchange could reduce overall data accuracy when compared with the current process.</p> <p>4) The proposal does not explicitly define which extensions, deviations and profiles are required for compliance. Without this information, it is not possible to assess interoperability (IoP) between parties, alignment with other CIM initiatives, or the level of modelling detail expected.</p> <p>5) We have concerns about vendor readiness, the implementation timelines and costs associated with software vendors adopting the new GC0139 data exchange functionality. Software tools are still being developed to align with LTDS CIM data, and ongoing challenges suggest further tool enhancements will be required to support the proposed GC0139 data exchange process.</p> <p>6) There are technical challenges with LTDS CIM implementation, which the LTDS CIM Working Group is actively addressing that require sufficient time to be worked through. Similar technical challenges are anticipated under GC0139, which need to be factored in to delivery timelines to ensure model consistency, and automated validation.</p> <p>7) There is insufficient supporting guidance explaining how parties are expected to transition from existing spreadsheet-based submissions to CIM Power System Models, including validation rules, acceptance criteria and governance arrangements.</p> <p>Until these issues are clarified and resolved, there is a significant risk that the proposed implementation approach will lead to inconsistent models, increased manual intervention and reduced data quality, which is not in consumers interests.</p> <p>Therefore, while we support the strategic direction of the proposal, we do not support the proposed implementation timeline in its current form and believe further technical definition, coordination with related changes, and industry readiness activity are required prior to approval.</p> <p>Taking into account the two-monthly development and governance cycle, the expected duration of software tool development informed by LTDS experience, the need to</p>
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		establish detailed technical requirements for the proposed data exchange, and the importance of allowing for an adequate trial and transition period, an implementation date of January 2028 is considered more realistic and achievable.
3	Do you have any other comments?	<p>The LTDS CIM Working Group had the advantage of a) DNOs only sharing their files with a one or two peer organisations for the purposes of IoP testing, and then with dozens of external stakeholders who quality assured the output and fed back any issues/challenges on the DNOs' behalf.</p> <p>With GC0139, NESO will be expected to accommodate 14 x CIM files, and they will need to import, understand, quality assess and engage the relevant DNO with any questions/concerns/challenges. This is a significant undertaking – especially if the quality of those files varies across DNOs.</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>GC0139 is limited to Planning Code changes that establish biannual planning-timescale data exchanges between DNOs and NESO including CIM/Common Grid Model Exchange Standard (CGMES), Power System Models (PSMs), PSM Scenario/Change Documents and DRC schedules. It does not amend the GB Article 18 Terms and Conditions for balancing service providers or balance responsible parties, nor does it change any balancing products, qualification, procurement or settlement arrangements. Article 18 obligations in Great Britain continue to be hosted within existing code frameworks (e.g., Connection and Use of System Code/Balancing and Settlement Code/Grid Code balancing sections) and updated via Ofgem-approved Article 18 processes as necessary. We therefore agree there is no impact on EBR Article 18 T&Cs.</p>