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STC Modification Proposal Form																
<h2>CM0106: Interface Substation Compliance Assessment</h2> <p>Overview: Previously in the planning code Transmission Owners (TOs) and Distribution Network Operators (DNOs) agreed on Access Groups and Access Periods. DNOs at week 24 would share schedules which would allow TOs to determine site compliance. Since NESO separation there has been no clear requirement for TOs to submit this information, which this modification aims to remedy.</p>		<h3>Modification process &amp; timetable</h3> <table border="1"> <tr> <td>1</td> <td><b>Proposal Form</b> 06 March 2026</td> </tr> <tr> <td>2</td> <td><b>Workgroup Consultation</b> 05 June - 26 June 2026</td> </tr> <tr> <td>3</td> <td><b>Workgroup Report</b> 30 September 2026</td> </tr> <tr> <td>4</td> <td><b>Code Administrator Consultation</b> 05 - 23 October 2026</td> </tr> <tr> <td>5</td> <td><b>Draft Final Modification Report</b> 17 November 2026</td> </tr> <tr> <td>6</td> <td><b>Final Modification Report</b> 08 December 2026</td> </tr> <tr> <td>7</td> <td><b>Implementation</b> TBC</td> </tr> </table>	1	<b>Proposal Form</b> 06 March 2026	2	<b>Workgroup Consultation</b> 05 June - 26 June 2026	3	<b>Workgroup Report</b> 30 September 2026	4	<b>Code Administrator Consultation</b> 05 - 23 October 2026	5	<b>Draft Final Modification Report</b> 17 November 2026	6	<b>Final Modification Report</b> 08 December 2026	7	<b>Implementation</b> TBC
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<p><b>Status summary:</b> The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.</p>																
<p><b>This modification is expected to have a: Low impact</b> NESO, Transmission Owners (TOs), Network Operators</p>																
<p><b>Proposer's recommendation of governance route</b></p>	<p>Standard Governance modification with assessment by a Workgroup</p>															
<p><b>Who can I talk to about the change?</b></p>	<p><b>Proposer:</b> Stuart McLarnon <a href="mailto:Stuart.McLarnon@neso.energy">Stuart.McLarnon@neso.energy</a></p>	<p><b>Code Administrator Contact:</b> Teri Puddefoot <a href="mailto:teri.puddefoot@neso.energy">teri.puddefoot@neso.energy</a></p>														

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## What is the issue?

Previously in the planning code Transmission Owners (TOs) and Distribution Network Operators (DNOs) agreed on Access Groups and Access Periods. DNOs, at week 24, would share schedules which would allow TOs to determine site compliance. If site was compliance was deemed satisfactory, then TOs would create a compliance report.

Since NESO separation, it is unclear if there is any licence obligation to carry out this work.

## Why change?

The requirement for these schedules was previously in the Planning Code within the Grid Code. These schedules are vital for energy forecasting teams to know which assets will be out of action and when. If these modelling teams do not receive compliance reports, they cannot create an accurate model of what the system will look like over the next years.

## What is the Proposer's solution?

Adding a requirement within the STC referencing an STCP for TOs with multiple DNOs connected to their network, including directly connected Independent Distribution Network Operators (IDNOs), to submit completed compliance reports to NESO. Note that a consequential modification may be required if GC0139 is passed, altering when this information is submitted.

## Draft legal text

Data Registration Code Schedule 11(a) and 17 would be referenced by the STCP, as this information submitted by DNOs in week 24 is what TOs use to determine site compliance and create their compliance reports (see **Annex 01**).

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## What is the impact of this change?

Proposer's assessment against STC Objectives	
Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon Transmission Licensees by Transmission Licences and the Electricity Act 1989;	<b>Neutral</b>
(b) efficient discharge of the obligations imposed upon the licensee by the Electricity System Operator licence, the Energy Act 2023 and Electricity Act 1989;	<b>Neutral</b>
(c) development, maintenance, and operation of an efficient, economical, and coordinated system of electricity transmission;	<b>Positive</b> This modification would allow TOs, DNOs, and NESO to continue to make forecasts as they did before NESO separation
(d) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity;	<b>Neutral</b>
(e) protection of the security and quality of supply and safe operation of the National Electricity Transmission System insofar as it relates to interactions between Transmission Licensees and the licensee*;	<b>Neutral</b>
(f) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC;	<b>Positive</b> This modification clarifies obligations for industry parties

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(g) facilitation of access to the National Electricity Transmission System for generation not yet connected to the National Electricity Transmission System or Distribution System; and	<b>Neutral</b>
(h) compliance with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency.	<b>Neutral</b>

\* See Electricity System Operator Licence

<b>Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories</b>	
<b>Stakeholder / consumer benefit categories</b>	<b>Identified impact</b>
Improved safety and reliability of the system	<b>Positive</b> This modification will ensure that obligations for the completion of Compliance Reports are in the correct place. Without these Compliance Reports, system safety and reliability cannot be fully determined.
Lower bills than would otherwise be the case	<b>Neutral</b>
Benefits for society as a whole	<b>Neutral</b>
Reduced environmental damage	<b>Neutral</b>
Improved quality of service	<b>Neutral</b>

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## When will this change take place?

### Implementation date:

10 Working days after Authority Decision

### Date decision required by

10 Working days after Authority Decision

### Implementation approach

N/A

### Proposer's justification for governance route

Governance route: Standard Governance modification with assessment by a Workgroup

This information was already being shared before NESO separation, the requirement for sharing of this information is just moving from the Grid Code to the STC/STCP.

Guidance on governance routes		
Timescales	Route	Who makes the decision (Governance type)
Normal	Proceed to Code Administrator Consultation*	Authority (Standard Governance) or Panel (Self-Governance)
	Assessment by a Workgroup**	
Urgent	Proceed to Code Administrator Consultation	Authority (Standard Governance)
	Assessment by a Workgroup	

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Fast-track	Straight to appeals window, then implementation	Panel (Self-Governance)
<p>* This route is for modifications which have a fully developed solution and therefore don't need to be considered by a Workgroup.</p> <p>** For modifications which need further input from industry to develop the solution.</p>		
<b>Self-Governance Criteria</b>		
<p>It depends on the material effect of the modification as to whether it should be subject to Standard or Self-Governance. If you are proposing that your modification should be subject to Self-Governance, you must explain how it meets the below criteria.</p> <p>The modification is unlikely to discriminate between different STC Parties and is unlikely to have a material effect on:</p> <ul style="list-style-type: none"> <li>Existing or future electricity customers;</li> <li>Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity,</li> <li>The operation of the National Electricity Transmission System</li> <li>Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies</li> <li>The STC Panel's governance procedures or the STC Panel's modification procedures</li> </ul>		
<b>Urgency Criteria</b>		
<p>If you are proposing that your modification is Urgent, you must explain how it meets Ofgem's Urgent criteria (below). When modifications are granted Urgency, this enables the us to shorten the standard timescales for industry consultations. Note that we (Code Admin) must seek Authority approval for this option.</p>		

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Ofgem's current guidance states that an urgent modification should be linked to an imminent issue or a current issue that if not urgently addressed may cause:

- A significant commercial impact on parties, consumers or other stakeholder(s); or
- A significant impact on the safety and security of the electricity and/or gas systems; or
- A party to be in breach of any relevant legal requirements.

### Fast-Track Self-Governance Criteria

This route is for modifications which are minimal changes to the code. E.g. Typos within the codes. If you are proposing that your modification should be subject to Fast-Track Self-Governance, you must explain how it meets the below criteria.

The modification is a housekeeping modification required as a result of an error or factual change, such as:

- Updating names or addresses listed in the STC;
- Correcting minor typographical errors;
- Correcting formatting and consistency errors, such as paragraph numbering, or;
- Updating out of date references to other documents or paragraphs.

## Interactions

<input checked="" type="checkbox"/> Grid Code	<input type="checkbox"/> BSC	<input type="checkbox"/> CUSC	<input type="checkbox"/> SQSS
<input type="checkbox"/> European	<input type="checkbox"/> Other	<input type="checkbox"/> Other	
Network Codes	modifications		

The need for this modification was noted during work on GC0139. A consequential modification may be required if GC0139 is passed, altering when Access Period information is submitted.



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## Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CM	Code Modification
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
STCP	System Operator Transmission Owner Code Procedure
SQSS	Security and Quality of Supply Standards
DNO	Distribution Network Operator
iDNO	Independent Distribution Network Operator
TO	Transmission Owner

## Annexes

Annex	Information
Annex 01	CM0106 DCR Schedule Tables