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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>	Bilal Amjad	
<b>Company name:</b>	Northern Powergrid	
<b>Email address:</b>	Bilal.amjad@northernpowergrid.com	
<b>Phone number:</b>	07514 312497	
<b>Which best describes your organisation?</b>	<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:

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

1	Mark the Objectives which you believe the proposed solution better facilitates than the current baseline:
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	Please provide your assessment for the proposed solution(s) against the Applicable Objectives against the current baseline.	Original	<input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None
		The Original Proposal should help DNOs and Users to better understand the interaction between transmission and distribution networks and help ensure that they are better able to develop a co-ordinated and efficient network.	
		<a href="#">Click or tap here to enter text.</a>	
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No	
		<p>Northern Powergrid are leading an ENA GC0139 CIM implementation project which has started to identify all the activities that will be required to implement the proposed GC0139 proposed text. Northern Powergrid agree with the comments provided separately by the ENA GC0139 CIM Working Group.</p> <p>We support the proposed implementation approach, although we believe that the January 2027 implementation date is unrealistic and not achievable, for the reasons given in the response from the ENA GC0139 CIM Working Group. Based on this work, our view is that an implementation date of September 2027 is more realistic.</p>	
3	Do you have any other comments?	The implementation of the functional requirements set out in the legal text in GC0139 will require development of extensions to CGMES v3.0. The development of the LTDS CIM also requires the development of extensions to CGMES v3.0. The nature and scope of the distribution network relevant to the LTDS and the GCode are different, so it is inevitable	

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		<p>that the two GCMES v3.0 extensions will be different, however it is important that the LTDS CIM implementation group and the GC0139 CIM implementation group work together to minimise the differences between these two extension sets – ideally one extension set that meets the needs of the LTDS and the GCode would be created as this would minimise the resources required to implement the data exchanges efficiently. There may be a need to change some aspects of the LTDS and/or the Grid Code in the future to address any issues that arise from the detailed development of the GCMES v3.0 extensions. We are of the view that the GCode GC0139 requirements are based on the reasonable needs of NESO, and it may be more pragmatic to modify the LTDS requirements to align with those in the Grid Code.</p> <p>In terms of comments on the proposed legal text we have three comments:</p> <p>1 In PC.9.3.2.3 there is a requirement for DNOs to provide Power System Difference Models (PSDM). It would help users if, in Appendix G of the Planning Code, there was more detailed description of a PSDM for example:</p> <ul style="list-style-type: none"> <li>a) whether PSMDs are required for committed projects with a commissioning date more than 10 years in the future.</li> <li>b) whether each PSDM is i) specific to a particular development project or accepted generation/demand connection or ii) should relate to a particular year and include all projects and</li> </ul>
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		<p>connections anticipated to be completed in that particular year.</p> <p>2 In PC.G.1.4.4 (b) (i) and PC.G.1.4.5 (b) (i) there is a requirement to provide information on 'Stored energy'. DNO's do not have access to real time data relating to the amount of stored energy from generators, so will not be able provide this information. This item should be removed or caveated by 'where available' to cater for where this information may be available in the future.</p> <p>3 In PC.G.1.4.4 (b) (ii) and PC.G.1.4.5 (b) (ii) there is a requirement to provide information on 'Storage status'. It is unclear what this means. The requirement should be clarified and potentially removed or caveated by 'where available'.</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>Click or tap here to enter text.</p>