

Public

Workgroup Consultation Response Proforma

GC0103: The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Codes

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 **12 June 2025**. 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 or claire.goult@neso.energy

Respondent details	Please enter your details	
Respondent name:	Graeme Vincent	
Company name:	SP Energy Networks	
Email address:	Graeme.vincent@spenergynetworks.co.uk	
Phone number:	07753 622336	
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 checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

Public

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (*this will be shared with industry and the Panel for further consideration*)

☐ **Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration*)

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

Public

For reference, 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.

Public

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 Workgroup Consultation questions			
1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives versus the current baseline??	Mark the Objectives which you believe each solution better facilitates than the current baseline:	
		Original	<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
		The existing proposals merely extends the lack of clarity on the use of electrical standards to another subset (applicable electrical standards) without addressing the fundamental issues of where and which Users they apply to. Not including or making reference within the Connection Conditions and European Connection Conditions compounds the current situation by introducing an additional set of terms Relevant Electrical Standards and Applicable Electrical Standards which only appear in the Glossary & Definitions and General Conditions Sections of the Grid Code without any	

Public

		obligation for Users to comply with them (or define what they are) – indeed customers should be complying with the Technical Specifications identified in CC.6.2 and ECC.6.2 and this interaction has not been considered sufficiently.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<p>Whilst we are supportive of the proposal to use a single harmonised standard across onshore TOs we are mindful that there are no clauses within the Grid Code which requires a User to comply with them –these Electrical Standards (and now Applicable Electrical Standards) are simply included within the Glossary & Definitions and General Conditions sections but not anywhere else. (There are limited references when it applies to the NESO communications standards but not in relation to the three onshore TOs standards)</p> <p>We would also note that retaining the legacy Electrical Standards references within the Annex to the General Conditions is not consistent with the treatment of previous versions of the standards as these are not retained within the Grid Code but are superseded by the more recent version. The version which applies at a particular connection site being referenced within the Bilateral Connection Agreement for that User and being applied at the time of connection. For new plant at</p>

Public

		an existing Connection Point then the requirements as set out in CC.6.2.1.2(a)(iii) and ECC.6.2.1.2(a)(iii) would apply and therefore it is not envisaged that changes to the legacy documents will be required and therefore maintaining a change process for them would not be appropriate.
3	Do you have any other comments?	We have provided comment on the proposed Glossary & Definitions legal text in the accompanying document to our response.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input checked="" type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input type="checkbox"/> No
		We are considering raising an alternative request which would provide clarity in relation to the applicability of the standards to Users.
5	Does the draft legal text satisfy the intent of the modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		Currently there is nothing within the Grid Code which requires users to comply with these Harmonised Standards and whilst this modification does indeed bring forward one set of Electrical Standards for the three onshore Transmission Owners, it does not resolve the defect noted above. It simply introduces another series of definitions into the Glossary and Definition section and alters the Governance Rules to cater for the

Public

		<p>new standards but does not fundamentally introduce the concept of where and to which Users these shall apply. This requires a fundamental review of the appropriate clauses within the Connection Conditions and European Connection Conditions sections of the Grid Code (and more specifically CC.6.2 and ECC.6.2) There are requirements for Users to comply with a set of Technical Specifications but not the set of Electrical Standards as referenced in the Annex to the General Conditions or the newly defined Applicable Electrical Standards. Merely including these as definitions (and providing a means for their update) does not place an obligation on Users to comply with them and simply continues to contribute to the lack of clarity in the application of electrical (or should that be technical specifications as the CCs and ECCs expects) within the Grid Code which have existed since these were introduced back in 2005.</p> <p>Simply introducing the definition of Relevant Electrical Standard (RES) with no acknowledgement of the existing Electrical Standard and/or Technical Specification definition is unhelpful and making reference to an out of date (guidance) document which applies only to England and Wales is not appropriate either</p>
--	--	--

Public

		<p>Creating another ungoverned document (with no appropriate TO oversight yet which has a material impact for them) for the Applicable Electrical Standards (AES) is not an appropriate means to include them in the Grid Code. These as previously mentioned should have their origins within the Grid Code and not an opaque, external document whose ownership and governance is unclear.</p> <p>We believe these two (RES and AES) definitions should be considered within the context of the section in which the obligations arise and therefore they may be unnecessary if the drafting of these sections (within the CCs and ECCs) is undertaken in a more considered manner.</p>
6	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>

Specific Workgroup Consultation questions

Public

7	<p>As set out at the bottom of page 12 of the consultation the three GB TOs have prepared a draft “Transmission Owners Relevant Electrical Standards” which can be found at Annex 03. Do you have any views on that document that you’d like to share?</p> <p>[Please note any comments to this question will be provided to the TOs and will not be addressed by this Workgroup].</p>	<div> <input type="checkbox"/> Yes <input type="checkbox"/> No </div> <div> <p>As co-authors of the document it is not appropriate for us to provide further comment.</p> </div>
---	--	--