

GC0169: Material changes arising from Grid Code Modification GC0136 (GC0169)

Decision: The Authority¹ directs² that the proposed modification to the Grid Code be made

Target audience: National Energy System Operator (NESO), the Grid Code Review Panel, Grid Code users and other interested parties

Date of publication: 22 April 2026

Implementation date: 10 working days after the Authority decision

Background

The European Union (EU) Connection Codes which ensure consistent, secure, and efficient grid connection standards across Europe, have been embedded into the Great Britain (GB) Grid Code (GC) as the technical basis for Power Station compliance, system stability requirements and interoperability through the implementation of GC Modifications³ GC0100, GC0101, GC0102 and GC0104. To ensure consistency and clarity in definitions and terms related to the GC, this modification is designed to address a number of outstanding issues identified following GC0136, which made non-material changes to the GC following implementation of the EU Connection Codes. The proposed solution includes assessing specific terms, improving certain clauses, and ensuring alignment with existing regulations.

The modification proposal

NESO (the ‘Proposer’) raised GC Modification GC0169: Material changes arising from Grid Code Modification GC0136 (the ‘Proposal’) on 06 March 2024.⁴

¹ References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

³ [Grid Code Modifications | National Energy System Operator](#)

⁴ [GC0169: Material changes arising from Grid Code Modification GC0136 | National Energy System Operator](#)

The Proposal seeks to address the non-specialist issues raised following GC0136 to ensure consistency and clarity of the GC. Key updates include enhancing the Glossary and Definitions for terms like Caution Notice, adjusting the definition of Scottish Hydro-Electric Transmission Limited (SHETL) and reviewing the requirements in Operating Code 9.6.4. Additionally, a review of the requirements in Balancing Code 2.13 regarding interconnector transfer times and associated defined terms was also undertaken as part of this modification and further checks were made to ensure alignment with Engineering Recommendation G99. As part of this modification, a review of some of the paragraphs in the General Conditions were also undertaken.

The Proposer considers the Proposal positively impacts Grid Code Objectives⁵ (ii), (iii), (iv) and (v) and has a neutral impact on Grid Code Objective (i).

The Workgroup held their Consultation between 20 March 2025 to 10 April 2025 and received four non-confidential responses and no confidential responses. All respondents were supportive of the proposed solution, making no additional comments. One respondent did note that they believe the solution addresses issues resulting from the EU Connection Network Codes and the proposed changes to enhance clarity for the end user.

The Workgroup met on 06 June 2025 to carry out their vote and concluded unanimously that the Original Solution better facilitated the Applicable Grid Code Objectives (AGCO) than the Baseline.

Grid Code Review Panel recommendation

The Panel met on 25 September 2025 to carry out their recommendation vote. The Panel recommended unanimously that the Proposer's solution be implemented.

⁵ See section E3.2 of the [Electricity System Operator Licence](#)

The Panel agreed by majority that AGCO (ii), (iii), (iv) and (v) would be better facilitated by the Proposal.

Our decision

We have considered the issues raised by the modification proposal and in the Final Modification Report dated 07 October 2025. We have considered and taken account of the responses to the industry consultation on the modification proposal which are included in the Final Modification Report⁶. We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the AGCO (ii), (iii), (iv) and (v) and has a neutral impact on (i).
- approving the modification is consistent with our principal objective and statutory duties⁷

Reasons for our decision

We consider this modification proposal will better facilitate AGCO (ii), (iii), (iv) and (v) and has a neutral impact on (i).

(ii) to facilitate 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 prevents nor restricts competition in the supply of generation of electricity);

⁶ [GC0169 Final Modification Report.pdf](#)

⁷ The Authority's statutory duties are wider than matters which the Grid Code Panel Review must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

We agree with the Proposer that the Proposal positively impacts this objective. This is because GC0169 will resolve inconsistencies and gaps in definitions arising from GC0136. Reducing ambiguity in the Grid Code will ensure the consistent interpretation of technical rules necessary to facilitate effective competition.

(iii) subject to paragraphs E3.2(b)(i) and E3.2(b)(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;

We agree with the Proposer that the Proposal positively impacts this objective. This is because GC0169 will enable consistency between the Grid Code, G99 and EU Grid Code requirements, improving the governance that underpins secure system operation.

(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;

We agree with the Proposer that the Proposal positively impacts this objective. This is because GC0169 will tighten the alignment between the Grid Code and related regulatory instruments, making regulatory compliance to codes and standards clearer.

(v) to promote efficiency in the implementation and administration of the Grid Code arrangements

We agree with the Proposer that the Proposal positively impacts this objective. GC0169 will reduce unnecessary complexities arising from unresolved drafting issues and enable efficient administration of the Grid Code by NESO.

Decision notice

In accordance with Standard Condition E3 of the Electricity System Operator Licence, the Authority hereby directs that Grid Code modification proposal Grid Code GC0169: Material changes arising from Grid Code Modification GC0136 be made.

Shilen Shah

Head of Strategic Planning, Codes and Standards

Signed on behalf of the Authority and authorised for that purpose