

Public

## Code Administrator Consultation Response Proforma

### GC0168: Submission of Electro Magnetic Transient (EMT) Models

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 **08 June 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>	Alan Creighton	
<b>Company name:</b>	Northern Powergrid	
<b>Email address:</b>	Alan.creighton@northernpowergrid.com	
<b>Phone number:</b>	07850 015515	
<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

Public

**I wish my response to be:**

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

Public

**For reference, (for consultation question 5) 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?**

## Public

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	Please provide your assessment for the proposed solutions against the Applicable Objectives versus the current baseline.	Mark the Objectives which you believe the proposed solutions better facilitate than the current baseline:
		Original <input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None
		WAGCM1 <input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input type="checkbox"/> v <input type="checkbox"/> None
		Click or tap here to enter text.

Public

2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input checked="" type="checkbox"/> WAGCMI <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		<p>Given that stakeholders could incur costs to comply with the new obligation to provide EMT models for legacy generation assets and Dynamic Reactive Compensation Equipment, it seems reasonable to align the implementation date of the requirement to provide the models with the financial cost recovery arrangements. It is important to note that in the case of LEEMPS where NESO require EMT models, that the obligation falls to the relevant network operator, and it seems reasonable that the associated costs of providing the models can be recovered from NESO customer base rather than DNO customer base.</p>
3	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		<p>We support an implementation approach that aligns the implementation of the technical requirement to provide EMT models with the implementation of the cost recovery mechanisms e.g. CUSC arrangements for directly connected</p>

Public

		Generators together with the associated DCUSA arrangements for LEEMPS.
4	Do you have any other comments?	<p>Yes. We have provided comments embedded in the following versions of the legal text:</p> <ol style="list-style-type: none"> <li>1 GC0168 – Planning Code – Original amc a. These comments are predominantly of an editorial nature.</li> <li>2 GC0168 – Planning Code – WAGCMI amc b. In addition to the editorial comments in relation in item 1, which will apply to this version of the legal text, there is a technical comment in the marked up version. This relates to whether NESO should be able to request EMT models before the cost recovery arrangements are in place, or whether NESO can request the models, but the timescales for Users to provide them do not apply until the cost recovery arrangements are in place.</li> <li>3 GC0168 – Planning Code – Original GC0139 Approved amc. When drafting GC0139, the workgroup was keen to simplify the confusing requirements in PC. A in relation to the network operator’s regular data exchange with NESO. This was largely achieved by replacing the requirements of PC.A from the network operators’ perspective with new clear requirements in a new PC.9 and PC.G. We are keen that the clarified approach in</li> </ol>

Public

		<p>GC0139 is maintained when GC0168 is implemented, and whilst it is encouraging that the GC0168 workgroup has considered the possibility that GC0139 might be approved before GC0168, we are not convinced that the proposed changes in this version of the legal text are correct. We have proposed some alternative legal text and identified areas that do need further consideration. In addition, the comments referenced in item 1 will also be applicable.</p> <p>4 GC0168 – Planning Code – WAGCM1 GC0139 Approved. Whilst we have not included a marked version of the legal text, the issues raised in item 1, 2 and 3 above will be applicable.</p>
5	Do you agree with the Workgroup’s assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <hr/> <p>Click or tap here to enter text.</p>

Public

	conditions held within the Code?	
--	----------------------------------	--