

Public

Grid Code Modification Proposal Form																
GC0190: Material Compliance Updates Overview: This modification seeks to correct a number of inconsistencies and mistakes within several sections of the Grid Code that relate to the Compliance function. All changes are clarifications needed which are Material. It seeks to update the relevant sections for clarity and to keep pace with technological change.		Modification process & timetable <table border="1"> <tr> <td>1</td> <td>Proposal Form 09 September 2026</td> </tr> <tr> <td>2</td> <td>Workgroup Consultation 04 January 2027 – 26 January 2027</td> </tr> <tr> <td>3</td> <td>Workgroup Report 29 April 2027</td> </tr> <tr> <td>4</td> <td>Code Administrator Consultation 04 May 2027 – 03 June 2027</td> </tr> <tr> <td>5</td> <td>Draft Final Modification Report 24 June 2027</td> </tr> <tr> <td>6</td> <td>Final Modification Report 05 July 2027</td> </tr> <tr> <td>7</td> <td>Implementation 10 Business Day following Authority Decision</td> </tr> </table>	1	Proposal Form 09 September 2026	2	Workgroup Consultation 04 January 2027 – 26 January 2027	3	Workgroup Report 29 April 2027	4	Code Administrator Consultation 04 May 2027 – 03 June 2027	5	Draft Final Modification Report 24 June 2027	6	Final Modification Report 05 July 2027	7	Implementation 10 Business Day following Authority Decision
1	Proposal Form 09 September 2026															
2	Workgroup Consultation 04 January 2027 – 26 January 2027															
3	Workgroup Report 29 April 2027															
4	Code Administrator Consultation 04 May 2027 – 03 June 2027															
5	Draft Final Modification Report 24 June 2027															
6	Final Modification Report 05 July 2027															
7	Implementation 10 Business Day following Authority Decision															
Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.																
This modification is expected to have a: Medium impact Generators, Transmission System Owners, Interconnectors, Network Operators, National Energy System Operator																
Modification Category: Efficiency																
Proposer's recommendation of governance route Standard Governance modification with assessment by a Workgroup		Proposer's view on modification priority Standard														
Who can I talk to about the change?	Proposer: Amanda Rooney Amanda.rooney@neso.energy	Code Administrator Contact: Grid.code@neso.energy														

Public

Contents

What is the issue?	3
Why change?	3
What is the Proposer's solution?	3
Legal text	5
What is the impact of this change?	5
Proposer's assessment against Grid Code Objectives	5
When will this change take place?	6
Implementation date:.....	6
Proposer's justification of Implementation date:	6
Date decision required by	6
Implementation approach	6
Proposer's justification for governance route.....	7
Proposer's view on prioritisation.....	7
Interactions	9
Industry engagement and feedback	9
Acronyms, key terms, and reference material	9

Public

What is the issue?

Following a review of the Grid Code, NESO has identified a number of legal text inaccuracies. This modification proposes to make changes to the text which will correct those inaccuracies. The changes come from repeated questions and clarification requests coming into NESO's Compliance team. There are a number of small issues which require an understanding of industry processes and input into the optimal new text. The Sections affected will be:

DRC : Data Registration Code

ECC: European Connections Code

ECP: European Compliance Processes

GD: Glossary & Definitions

PC: Planning Code

Why change?

The change is proposed to correct sections of the Grid Code with the aim of achieving an accurate Grid Code, making Compliance easier for all Parties, especially small and new Parties.

What is the Proposer's solution?

A table has been included below summarising the resolutions required to resolve with Workgroup input:

Grid Code Section	Resolution Required
ECC.6.3.7.3.4(iii):	Remove 'in no less than 0.5 seconds'. Add 'within'. The paragraph as presently written is not logical.
ECP.A.3.6.7 (first section)	Remove: The above suite of simulation studies equally apply for Electricity Storage Modules when in an export mode of operation and should also demonstrate transition to an import mode of operation in line with the stated Droop characteristics of the

Public

	Electricity Storage Module when in an import mode of operation. Three simulation studies need to be carried out: Add: The above suite of simulation studies in ECP.A.3.6.1 to ECP.A.3.6.5 equally apply for Electricity Storage Modules when in an export mode of operation. In addition, an Electricity Storage Public 7 Public Module shall also demonstrate transition to import mode of operation in line with the stated Droop characteristics. When in an import mode of operation, three simulation studies need to be carried out:
ECP.A.6.6.3	ECP.A.6.6.3 states '10 minutes' whereas ECC.6.3.9 states '30 minutes'. NESO believes 30 minutes is correct
PC.A.9.6.1.4	"RMS (Root Mean Square) models must be submitted accepted by The Company " Change to 'accepted',
PC.A.9.2.2	Clarify that where Plant and Apparatus is capable of both importing and exporting power, the EMT model should represent both power transfer directions where relevant to GC studies or Bilateral Agreement requirements. This is particularly relevant for BESS (Battery Energy Storage Systems), HVDC (High Voltage Direct Current), interconnectors. The same requirement is applicable for RMS model as well, however the Grid Code doesn't capture it clearly.
PC.A.6.7 (Dynamic Models)	The majority of this section is superseded by PC.A.. 'RMS and/or EMT (Electro Magnetic Transient) models to be provided in accordance with PC.A.9' to enable NESO to apply PC.A.9 to parties where models are not required (e.g. small embedded generators subject to a bilateral agreement), but otherwise suggest removing duplication
PC.A.6.1.3	Clarification- where a requirement is identified a model may be requested

Public

Throughout	Clarify which embedded power stations should be updated to state 'subject to a bilateral agreement with The Company' as it is currently ambiguous.
GD.1	Addition of new defined term to capture static reactive compensation equipment: Static Reactive Compensation Equipment – Plant and Apparatus capable of injecting or absorbing Reactive Power in a controlled manner which includes but is not limited to shunt/series reactors and capacitors.
DRC.6.2	Table requires updates
DRC.Sch 3	Section pre-dates REMIT (Regulation on Wholesale Energy Market), propose delete section and introduce note stating: this Schedule is superseded by EU Regulations
DRC Sch 21 and 22	Add 2 new Schedules for Models (RMS, EMT model) , so it can be referenced on the Portal

Legal text

Legal text to be developed through Workgroups.

What is the impact of this change?

Minimal impact is anticipated to all impacted Users since the proposed change does not seek to introduce any new obligations to Grid Code Users.

Proposer's assessment against Grid Code Objectives

Relevant Objective	Identified impact
(i) To permit the development, maintenance, and operation of an efficient, coordinated, and economical system for the transmission of electricity;	Neutral
(ii) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity	Neutral

Public

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;	Neutral
(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	Neutral
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive Removal of errors will result in a more accurate Grid Code.

* See Electricity System Operator Licence

When will this change take place?

Implementation date:

10 Business Days following Authority Decision.

Proposer's justification of Implementation date:

The standard 10 Business Day window will be sufficient for this proposal.

Date decision required by

As soon as possible.

Implementation approach

The implementation approach will depend on the level of change required by industry following clarifications provided by the Workgroup.

Public

Proposer's justification for governance route

Governance route: Standard Governance modification with assessment by a Workgroup

It has been agreed that the changes proposed on this Modification are material, and therefore Workgroup discussions are desired to ensure the amendments are made in a satisfactory manner for all Users.

Proposer's view on prioritisation

*Proposers should refer to the Ofgem's Guidance on **Code Modification Prioritisation** document, for assistance when completing these sections.*

This Modification is designed to implement corrections to the Codes where inaccuracies or inconsistencies exist. It is not changing or adding any processes or requirements, and therefore we do not consider it to be a High priority.

Prioritisation Criteria	Impact
Alignment with the Strategic Direction Statement Please explain how this modification aligns to the delivery of government policies and developments relating to the energy sector as set out in the <u>Strategic Direction Statement</u> (SDS). This should include an assessment of whether the modification supports delivery of policy priorities set out in the 'Act now', 'Think and plan' or 'Listen and wait' SDS categories.	Partial This Modification is designed to make corrections to the Code documents to accurately reflect the current processes, and not add or change any existing ones. It is therefore not considered urgent or of High priority
Complexity Please explain the expected the level of industry resource, knowledge and/or time required to progress this modification through to implementation. This can include the scope of process or system change required to facilitate the modification, whether cross code changes are	Partial See above

Public

required, the input and expertise required from code parties, and the number of consequential changes that would arise from implementation of the modification.	
Importance Please explain the perceived value, criticality and risk to industry, consumers, and/or other stakeholders of the implementation of the modification, taking account of written guidance that the Authority may provide. This can include its interaction with or enabling of other financial, regulatory, licence and/or compliance obligations, changes to costs for stakeholders, systemic impacts and potential systemic risk arising from non-implementation, and its cross-code impacts.	Partial See above

Proposer Priority Recommendation – (choose one)

High Priority	Standard Priority
☐ High – These modifications require faster development and resolution than the standard timeline. High priority could include a modification that has not been deemed urgent under existing code urgency processes but still requires development and implementation within a specific timeframe.	☒ Standard – Modifications are expected to follow a standard modification timeline. Development may be paused, for example, if the modification is dependent on the outcome of another modification.

Public

Interactions

- | | | | |
|---|---|--|--------------------------------|
| ☐ CUSC | ☐ BSC | ☐ STC | ☐ SQSS |
| ☐ European Network Codes | ☐ EBR Article 18 T&Cs ¹ | ☐ Other modifications | ☐ Other |

Industry engagement and feedback

These errors have been discussed with Parties and Panel in the past, but this package was not presented as a package for feedback. This modification was presented at the Grid Code Development Forum (GCDF) in August 2026, and also at the August Grid Code Review Panel (GCRP). The Panel agreed that these changes were material and required amendments to be made to the proposal.

Acronyms, key terms, and reference material

Acronym / key term	Meaning
BESS	Battery Energy Storage Systems
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
EBR	Electricity Balancing Regulation
ECC	European Connection Conditions
EMT	Electro Magnetic Transient model
EPC	European Compliance Processes
GC	Grid Code
GCDF	Grid Code Development Forum
GCRP	Grid Code Review Panel
HVDC	High Voltage Direct Current
PC	Planning Code

Public

REMIT	Regulation on Wholesale Energy Market
RMS	Root Mean Square
SQSS	Security and Quality of Supply Standards
STC	System Operator Transmission Owner Code
T&Cs	Terms and Conditions