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Workgroup Consultation Response Proforma

GC0182: Standardisation of Power Flow Metering Polarity

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 May 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

Respondent details	Please enter your details	
Respondent name:	Andrew Urquhart	
Company name:	SSE Generation	
Email address:	andrew.urquhart@sse.com	
Phone number:	01738 456000	
Which best describes your organisation?	☐ Consumer body ☐ Demand ☐ Distribution Network Operator ☒ Generator ☐ Industry body ☐ Interconnector	☐ Storage ☐ Supplier ☐ System Operator ☐ Transmission Owner ☐ Virtual Lead Party ☐ Other

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 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 questions 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;*

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- 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 Workgroup Consultation questions

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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: <table border="1"> <tr> <td data-bbox="617 551 866 678">Original</td><td data-bbox="866 551 1415 678"> ☒i ☐ii ☒iii ☒iv ☐v </td></tr> </table> i. Having more accurate metering information will allow NESO to more efficiently balance the system supported by better forecasting. More accurate information will also flow into better modelling by NESO strategic planning teams. ii. No change iii. Increased efficiency in commissioning due to reduced need for polarity amendments. iv. No change v. Improved standardisation of metering requirements, reducing ambiguity and administrative effort, albeit with relatively limited and incremental efficiency benefits.	Original	☒ i ☐ ii ☒ iii ☒ iv ☐ v
Original	☒ i ☐ ii ☒ iii ☒ iv ☐ v			
2	Do you support the proposed implementation approach?	☒Yes ☐No We welcome the pragmatic approach to the implementation date, allowing sufficient time for industry parties to achieve compliance. We also welcome that the modification does not mandate		

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		how polarity is achieved (e.g. through physical wiring or digital adjustments on site). The key requirement is that the polarity data received by NESO is correct and consistent.
3	Do you have any other comments?	As a matter of good industry practice, we do not support the use or inclusion of guidance notes within connection offers. Guidance notes are typically subject to weaker governance arrangements and cannot be readily influenced by affected parties. This risks introducing requirements outside of the formal code governance framework. Where a requirement is necessary for compliance, this should be established through the appropriate code modification process. We also question the impact that incorrect metering polarity may have had on non-operational processes, such as the CSNP. Have the 800 incorrect metering points been assessed and corrected for in NESO's strategic planning processes? If not, this could materially impact the outcomes of the CSNP and SSEP and should be clarified.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	☐ Yes (the request form can be found in the Workgroup Consultation Section) ☒ No Click or tap here to enter text.
5	Does the draft legal text satisfy the intent of the modification?	☒ Yes ☐ No

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		We consider the legal text to be appropriate and proportionate to the intent of the modification. No material issues have been identified. The approach of implementing the requirements via the Electrical Standards framework appears reasonable, providing an efficient route for updates while relying on existing governance and compliance arrangements.
		Click or tap here to enter text.

Specific Workgroup Consultation questions

6	Do you believe it is appropriate to include the metering polarity requirements as an Electrical Standard? If not, please state your rationale.	☒ Yes ☐ No
7	Do you have any specific comments on the draft Metering Polarity Electrical Standard (Annex 05)?	No comment
8	Do you believe the compliance timescales of 540 days (18 months) after implementation	Yes this is an appropriate timescale and we welcome the NESO listening to feedback and evolving the implementation approach.

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	is appropriate for this modification?	
9	There is a concern on signing the BCA this Standard may not actually exist and creates the potential for there to be a minor conflict between the BCA and the Grid Code concerning Generators. Do stakeholders agree that this is a reasonable low risk approach?	We do not consider there to be a legal conflict. While the BCA may reference the forthcoming standard, this does not create a standalone compliance obligation ahead of the Grid Code change. The Grid Code remains the governing framework and legal basis for compliance. We recognise there may be some potential for confusion during this interim period, which underpins our concerns regarding the inclusion of such linkages within the BCA.
10	If OFGEM reject the GC0182 but NESO still have the Guidance Note published on the website, will that be a conflict to OFGEM's decision and give the industry a false impression that there is still a meter polarity standard to follow?	Yes. While this would not create a direct legal conflict, retaining such guidance following rejection of GC0182 risks giving the industry a false impression that a metering polarity standard remains expected. This could blur the distinction between Ofgem's formal decision and NESO's preferred approach, creating uncertainty for stakeholders and potentially resulting in the guidance being treated as a de facto requirement despite not being approved through the formal governance process.