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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:	Graeme Vincent	
Company name:	SP Energy Networks	
Email address:	Graeme.vincent@spenergynetworks.co.uk	
Phone number:	Click or tap here to enter text.	
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>Original</td> <td> ☒i ☐ii ☒iii ☐iv ☐v </td> </tr> </table>
Original	☒ i ☐ ii ☒ iii ☐ iv ☐ v	
Click or tap here to enter text.		
2	Do you support the proposed implementation approach?	☒ Yes ☐ No
		Click or tap here to enter text.
3	Do you have any other comments?	No
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
		We note that the legal text places an obligation on NESO to 'validate and check' and therefore wondered if there were an opportunity to reflect these requirements into the compliance processes for all Users. We note that there is an existing requirement under the European Compliance Processes in relation to compliance testing for

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		operational metering but this only applies to Network Operators and Non-embedded customers (ECP.A.8.2) and therefore does not apply to the majority of expected connections (generation). We also note that there isn't a corresponding requirement under the Compliance Process in relation to operational metering, so again will not apply across all Users. Reflecting these requirements into the compliance process would then ensure that the polarity is checked as part of the commissioning and compliance processes and prevent future connections or modifications being made with inconsistent polarity to that expected by NESO conventions.
		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 To ensure that all parties adhere to the same convention then providing it is an Electrical Standard is appropriate.
7	Do you have any specific comments on the draft Metering Polarity Electrical Standard (Annex 05)?	Having had the opportunity to contribute during the working group stage we have no specific additional comments to make at this time.

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8	Do you believe the compliance timescales of 540 days (18 months) after implementation is appropriate for this modification?	Yes, the timescales seem more than reasonable.
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 believe that this is a valid concern given that on the signing of a BCA, this effectively determines which Electrical Standards (or version thereof) apply and therefore there is potential that if the BCA includes reference to the Standard then it would not be possible for the User to comply with it or for it to be enforced. This is equally applicable to all Users and not just Generators.
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?	As long as the published NESO Guidance Note is considered as guidance only and not as a de facto Grid Code requirement which needs to be complied with then there should be no conflict.