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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:	Alan Creighton	
Company name:	Northern Powergrid	
Email address:	alan.creighton@northernpowergrid.com	
Phone number:	07850 015515	
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*)

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☐ **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)

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

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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;*
- 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.*

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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

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:	
		Original	☒ i ☐ ii ☒ iii ☐ iv ☐ v
		Click or tap here to enter text.	
2		☒ Yes	

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	Do you support the proposed implementation approach?	☐ No We have responded 'yes', however, it would seem reasonable to include checking the operational metering polarity as part of the Compliance Process to confirm that equipment has been commissioned in accordance with the Electrical Standard. This may require changes to the CP part of the grid Code.
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.
25	Does the draft legal text satisfy the intent of the modification?	☐ Yes ☒ No We have made comments and suggestions that are embedded in the attached versions of the legal text, which form part of our consultation response. Whilst there are two versions of the General Conditions (GC) presented in the consultation

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		pack, one with the proposed GC0103 changes and one without, it is worth noting that GC0103 also propose changes to CC.6.2.1.2 and ECC.6.2.1.2, hence for completeness there should be GC0103 aligned versions of the CC and ECC, not just the GC.
		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)?	Yes. We have made comments and suggestions that are embedded in the attached versions of the legal text, which form part of our consultation response.
8	Do you believe the compliance	This period seems reasonable.

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	timescales of 540 days (18 months) after implementation 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?	The date that the Bilateral Agreement is signed dictates which version of the Electrical Standards is the one that applies to that connection. If, at that date, there is no Electrical Standard relating to Metering Polarity Convention for Power Flow data, then there would be no requirement to for User to comply with such a standard. We think this would be the case irrespective of the proposed change to CC/ECC6.5.6.4 (f) as the Grid Code would require for compliance with an Electrical Standard which simply didn't exist.
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 NESO Guidance Note is a guidance note that effectively has no status and need not be complied with. Provide that this is clear in the guidance note then there should be no conflict.

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	the industry a false impression that there is still a meter polarity standard to follow?	
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