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Grid Code Modification Proposal Form

GC0192: Alignment of Load Block Unique Identifier Range with ESEC

Overview: This modification proposes to align the unique identifier range in the Grid Code definition of Load Block with the Electricity Supply Emergency Code (ESEC), removing an inconsistency that currently exists between the two documents.

Modification process & timetable

1. **Proposal Form**
   14 October 2026
2. **Code Administrator Consultation**
   03 November 2026 – 03 December 2026
3. **Draft SG Final Modification Report**
   09 December 2026
4. **Final SG Modification Report**
   17 December 2026
5. **Appeals**
   29 December 2026 – 19 January 2027
6. **Implementation**
   03 February 2027

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: Low impact
National Energy System Operator, Distribution Network Operators, independent Distribution Network Operators.

Modification Category: Harmonisation

Proposer's recommendation of governance route	**Proposer's view on modification priority**
Self-Governance modification to proceed to Code Administrator Consultation	Not Applicable

Who can I talk to about the change?	**Proposer:**	**Code Administrator Contact:**
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What is the issue?

The unique identifier range in the Grid Code definition of Load Block does not align with the range specified in the Electricity Supply Emergency Code (ESEC)[1], which is a document owned by the Department for Energy Security and Net Zero (DESNZ). The term Load Block was introduced into the Grid Code as part of the modification GC0176, which was approved by Ofgem earlier this year. The Grid Code currently designates each Load Block with a unique identifier in the range of 'A' to 'E', 'G' to 'N' or 'P', while the ESEC designates each Load Block with a unique identifier in the range of 'A' to 'E', 'G', 'H', 'J' to 'N', 'P' or 'Q'.

Specifically, the Grid Code includes 'I', which is not included in the ESEC, and omits 'Q', which is included in the ESEC.

Therefore, the Grid Code definition does not reflect the ESEC Load Block unique identifier range.

Why change?

The unique identifier range in the Grid Code definition of Load Block should align with the range specified in the ESEC, which has been in place for a number of years and is accepted by wider industry participants such as Energy Suppliers and Ofgem. Maintaining different ranges could create uncertainty as to which Load Block identifiers apply when the two documents are read together.

Updating the Grid Code will remove this inconsistency, ensuring that the range of unique identifiers in the Grid Code are in alignment with the range of unique identifiers in the ESEC.

What is the Proposer's solution?

We propose that the Grid Code definition of Load Block should be amended to align its unique identifier range with the range specified in the ESEC. There will be no changes to the obligations, simply the identifier letter denoting the obligation.

[1] https://www.gov.uk/government/publications/electricity-supply-emergency-code

The existing range of 'A' to 'E', 'G' to 'N' or 'P' will be replaced with 'A' to 'E', 'G', 'H', 'J' to 'N', 'P' or 'Q'. This will remove 'I', include 'Q' and eliminate the inconsistency between the Grid Code and the ESEC.

As the proposed legal text already requires amendment to the Load Block definition in the Glossary and Definitions, we propose to take this opportunity to correct the alphabetical ordering of the defined terms Load Angle, Load Block and Loaded. Load Angle will be placed before Load Block and Loaded will be placed after Load Block so that the defined terms appear in alphabetical order. This is a housekeeping change and does not alter the meaning or application of the defined terms.

What is in and out of scope?

In scope is the amendment of the unique identifier range in the Grid Code definition of Load Block to remove 'I' and include 'Q', aligning it with the range specified in the ESEC. In scope is reordering the defined terms Load Angle, Load Block and Loaded within the Glossary and Definitions so that they appear in alphabetical order.

Out of scope are any other changes to the Load Block definition or to the allocation, sequencing, operation or application of Load Blocks.

Draft legal text

Draft legal text has been developed and is provided separately with this Proposal Form. The proposed amendment updates the unique identifier range in the Grid Code definition of Load Block to remove 'I' and include 'Q', aligning it with the range specified in the ESEC. The proposed legal text also reorders the defined terms Load Angle, Load Block and Loaded so that they appear in alphabetical order.

What is the impact of this change?

This modification is expected to have no impact on NESO, Distribution Network Operators and independent Distribution Network Operators.

The substantive change is limited to aligning the unique identifier range in the Grid Code definition of Load Block with the range specified in the ESEC. The modification also includes a housekeeping amendment to place the defined terms Load Angle, Load Block and Loaded in alphabetical order. Neither change alters the allocation, sequencing,

operation or application of Load Blocks, or the meaning or application of Load Angle and Loaded.

The modification will remove an inconsistency that currently exists between the Grid Code and the ESEC, reducing uncertainty as to which Load Block identifiers apply when the two documents are read together.

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** The modification is limited to updating the unique identifier range in the Grid Code definition of Load Block and does not affect the development, maintenance or operation of the transmission system.
(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);	**Neutral** The modification does not change the commercial arrangements, rights or obligations of market participants and is not expected to affect competition in the generation or supply 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** The modification is limited to aligning the unique identifier range in the Grid Code definition of Load Block with the

	range specified in the ESEC. It does not change the operation or application of Load Blocks and is not expected to materially affect the security or efficiency of the electricity generation, transmission or distribution systems.
(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** The modification is limited to updating the unique identifier range in the Grid Code definition of Load Block and is not expected to materially affect the discharge of NESO's licence or regulatory obligations.
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements	**Positive** The modification removes an inconsistency between the unique identifier range in the Grid Code definition of Load Block and the range specified in the ESEC. It also corrects the alphabetical ordering of related defined terms in the Glossary and Definitions. Together, these amendments improve the clarity, consistency and usability of the Grid Code and supports its

	efficient implementation and administration.

**** See Electricity System Operator Licence***

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories	
Stakeholder / consumer benefit categories	**Identified impact**
Improved safety and reliability of the system	**Neutral** The modification is limited to aligning the unique identifier range in the Grid Code definition of Load Block with the range specified in the ESEC. It does not change the allocation, sequencing, operation or application of Load Blocks and is not expected to materially affect system safety or reliability.
Lower bills than would otherwise be the case	**Neutral** The modification updates the unique identifier range in the Grid Code definition of Load Block and does not introduce any operational, process or system changes. Therefore, it is not expected to have a material impact on costs to industry or consumers.
Benefits for society as a whole	**Neutral** The modification removes an inconsistency between the unique identifier ranges specified in the Grid Code and the ESEC. However, it does not change the operation or application of Load Blocks and is not expected to result in a direct or material societal impact.
Reduced environmental damage	**Neutral** The modification is limited to updating the unique identifier range in the Grid Code definition of Load Block. It does not change the operation of electricity

	system or introduce arrangements expected to have a material environmental impact.
Improved quality of service	**Neutral** The modification improves the clarity and consistency of the Grid Code by aligning its Load Block unique identifier range with the range specified in the ESEC. However, it does not change the operation or application of Load Blocks and is not expected to directly affect the quality of service provided to consumers.

When will this change take place?

Implementation date:

03 February 2027.

Proposer's justification of Implementation date:

To remove the inconsistency between the unique identifier ranges specified in the Grid Code and the ESEC at the earliest practicable opportunity.

Date decision required by

None

Implementation approach

Grid Code legal text update only. No changes to systems, processes or operational arrangements are required as a result of this modification. Any consequential amendment to the Distribution Code would be progressed separately through the relevant Distribution Code governance process.

Proposer's justification for governance route

Governance route: Self-Governance modification to proceed to Code Administrator Consultation

The modification is narrow in scope. It aligns the unique identifier range in the Grid Code definition of Load Block with the range specified in the ESEC and corrects the alphabetical ordering of the defined terms Load Angle, Load Block and Loaded. These

amendments do not change the allocation, sequencing, operation or application of Load Blocks, or the meaning or application of the defined terms.

The issue, proposed solution and required legal text are clearly defined. Therefore, a Workgroup is not considered necessary to develop the solution further. Proceeding directly to Code Administrator Consultation will provide industry stakeholders with the opportunity to review and comment on the proposed amendment.

We do not consider that this modification will discriminate between Grid Code Parties or materially affect customers, competition, operation of the transmission system, sustainable development, safety, security of supply, the management of network emergencies, or Grid Code governance procedures.

Therefore, self-governance is considered proportionate to the limited scope and expected low impact of the modification.

Interactions

☐CUSC	☐BSC	☐STC	☐SQSS
☐European Network Codes	☐ EBR Article 18 T&Cs[1]	☒Other modifications	☒Other ☐DRC Portal

This modification interacts with the ESEC because it aligns the unique identifier range in the Grid Code definition of Load Block with the range specified in the ESEC.

The term Load Block is also defined in the Distribution Code, which currently contains the same unique identifier range as the existing Grid Code definition. The term Load Block was introduced into the Distribution Code through the joint Grid Code / DCode working group on modifications GC0176 (Grid Code) and DC/25/06. An equivalent amendment to the Distribution Code is likely to be required to maintain alignment between the Grid Code, Distribution Code and ESEC. We propose to highlight this to the Distribution Code Review Panel for consideration.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DCode	Distribution Code
DESNZ	Department for Energy Security and Net Zero
DRC	Digitalised Registration and Connections
EBR	Electricity Balancing Regulation
ESEC	Electricity Supply Emergency Code
NESO	National Energy System Operator
SDS	Strategic Direction Statement
SQSS	Security and Quality of Supply Standard
STC	System Operator–Transmission Owner Code
T&Cs	Terms and Conditions

Annex	Title
Annex 01	Legal Text

Reference material

- NESO Grid Code - The Grid Code | NESO
- Electricity Supply Emergency Code (April 2026) - Electricity Supply Emergency Code - March 2026
- Distribution Code of Great Britain, Issue 62 (27 August 2026) - THE DISTRIBUTION CODE