Public

Code Administrator 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 **06 November 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 Urquhrt	
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)*

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;*

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.

Public

Please express your views in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions			
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives against the current baseline.	Mark the Objectives which you believe the proposed solution(s) better facilitates than the current baseline:	
		Original	☒i ☐ii ☒iii ☐iv ☒v ☐None
		SSE supports the introduction of a common operational metering polarity convention and agrees that the proposal better facilitates Applicable Objectives (i), (iii) and (v) compared with the current baseline. The introduction of a formal Electrical Standard should improve consistency in metering signals provided to NESO, reduce the need for manual polarity corrections and workarounds and support more efficient system operation and administration.	
2	Do you support the proposed implementation approach?	☒Yes ☐No	
		SSE supports the proposed implementation approach. The use of a 540-day implementation period provides stakeholders with sufficient time to incorporate the new requirements into project development and compliance processes. SSE also supports the decision to apply the Electrical Standard prospectively through Completion Date and operational metering installation or modification triggers rather than requiring	

		retrospective compliance across existing operational assets. SSE welcomes the clarification provided through the additional applicability scenarios included in the Code Administrator Consultation document. These significantly improve understanding of when the obligations will apply to GB Code Users and EU Code Users.
3	Do you have any other comments?	SSE welcomes the Workgroup's decision to replace the term "upgrade" with the defined Grid Code term "Modification", which provides greater consistency with existing Grid Code terminology. However, SSE considers that additional implementation guidance would be beneficial regarding the types of operational metering changes intended to trigger compliance with the Electrical Standard. In particular, further clarification would assist users in understanding whether activities such as: • like-for-like operational metering replacement; • current transformer replacement; • operational metering refurbishment; • SCADA signal reconfiguration; or • software-based polarity corrections are intended to constitute a Modification for the purposes of CC.6.5.6(f) and ECC.6.5.6.4(f). SSE supports the use of a formally governed Electrical Standard rather than reliance on guidance documents

		or connection agreement wording. SSE considers this provides a clearer and more transparent governance framework for future updates.
4	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	☒Yes ☐No
		SSE agrees with the Workgroup's assessment that GC0182 does not impact Electricity Balancing Regulation Article 18 terms and conditions. The proposal introduces a technical operational metering polarity convention and associated compliance arrangements but does not materially affect balancing service procurement, balancing products or balancing market arrangements.