

## Workgroup Consultation

### GC0109:

Publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc. (“System Warning Alerts”) issued by or to the Network Operator(s).

**Overview:** GC109 seeks to publish on BMRS any System Warning Alerts that are not currently shared with market participants.

#### Modification process & timetable

- 1 • **Proposal form**  
• 21 February 2018
- 2 • **Workgroup Consultation**  
• 25 November 2020 - 16 December 2020
- 3 • **Workgroup Report**  
• 20 January 2021
- 4 • **Code Administrator Consultation**  
• 1 February 2021 - 1 March 2021
- 5 • **Draft Modification Report**  
• 17 March 2021
- 6 • **Final Modification Report**  
• 9 April 2021
- 7 • **Implementation**  
• 10 working days after Authority decision

Have 5 minutes? Read our [Executive summary](#)

Have 20 minutes? Read the full [Workgroup Consultation](#) document

Have 30 minutes? Read the full Workgroup Consultation document and annexes

**Status summary:** The Workgroup are seeking your views on the work completed to date to form the final solution(s) to the issue raised.

**This modification is expected to have a: Medium impact** on Transmission Owners (including OFTOs and Interconnectors), Distribution Network Operators, Transmission System Users, the ESO, ELEXON and Generators.

#### Governance route

This modification is being assessed by a Workgroup and Ofgem will make the decision on whether it should be implemented.

The Proposer sought urgent treatment of GC0109 at the June 2018 Grid Code Review Panel (GCRP). The GCRP, by majority, recommended urgency and provided this recommendation to Ofgem on 4 July 2018. Ofgem, in their [decision letter](#) of 13 August 2018, did not grant Urgency<sup>1</sup>. However, Ofgem encouraged the ESO to explore ways to increase transparency around system warnings as soon as possible, and potentially outside of the industry codes process if appropriate.

<sup>1</sup> Ofgem stated in their decision letter on Urgency “We do not consider that the arguments raised by the Proposer in the request are substantiated with sufficient evidence or explanation of how failure to consider GC109 on an urgent basis would result in a significant commercial impact on market participants”

<b>Who can I talk to about the change?</b>	<b>Proposer:</b> Garth Graham, SSE Generation <a href="mailto:garth.graham@sse.com">garth.graham@sse.com</a> Phone: 01738 456000	<b>Code Administrator Chair:</b> Paul Mullen <a href="mailto:paul.j.mullen@nationalgrideso.com">paul.j.mullen@nationalgrideso.com</a> Phone: 07794 537028
<b>How do I respond?</b>	Send your response proforma to <a href="mailto:grid.code@nationalgrideso.com">grid.code@nationalgrideso.com</a> by <b>5pm on 16 December 2020</b>	

## Executive Summary

GC0109 seeks to require the ESO to publish on BMRS any GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc. (“System Warning Alerts”) issued by or to the ESO that are not currently required to be shared with market participants.

## What is the issue?

There are various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc., issued by or to the Network Operator(s), which currently are not shared in a timely manner to other market participants or may not be available at all to other market participants.

## What is the solution and when will it come into effect?

### Proposers solution:

<p><b>Grid Code Changes</b> - Obligation in Grid Code for Network Operators to issue all System Warning Alerts<sup>2</sup> issued<sup>3</sup> or received (including whether they ‘activate’ or ‘deactivate’ an action) to market participants via ELEXON.</p>	<p><b>Publish on BMRS</b> - All System Warning Alerts to be sent by the ESO to ELEXON and issued on BMRS</p>	<p><b>Timing</b> – Window of 15 minutes (on a reasonable endeavours basis) from the ESO issuing the System Warning Alert to ELEXON for publication on the BMRS.</p> <p>Window of 20 minutes (on a reasonable endeavours basis) from the ESO receiving the System Warning Alert to ELEXON for publication on the BMRS.</p>
--	--	---

No alternative solutions proposed at this stage.

### Implementation date:

10 working days after Authority decision.

## What is the impact if this change is made?

The Proposer believes that publication of these System Warning Alerts will provide enhanced transparency for market participants so they have confidence that the operation of the NETS is robust.

Estimates suggest there are minimal costs and process impacts on the ESO to send the additional System Warning Alerts to ELEXON. No system costs are envisaged for ELEXON based on the implementation options being brought forward.

<sup>2</sup> As proposed to be listed in Grid Code OC7 Appendix 2 – see Annex 4 for more details

<sup>3</sup> Or amended, or updated

## Interactions

There are some parallels with GC0133<sup>4</sup>, as GC0133 also seeks to publish additional data on the state of the GB NETS. However, the scope of GC0133 is much more specific in seeking the publication of the GB System State as inputted by the ESO to the European Awareness System. GC0109 covers a wider range of System Warning or Alerts. (irrespective of whether or not System Warning Alerts have or have not been published).

The Workgroup noted Ofgem's [send back letter](#) on GC0133, and specifically highlighted two points:

- Need more detailed information on how specific market participants could use the system state updates in practice, and a demonstration of what positive steps they could take upon receiving these updates; and
- It does not describe the underlying evidence on the benefits and/or costs e.g., whilst GC0133 refers to “improving wider industry communications”, it does not demonstrate or provide evidence on how GC0133 would lead to those end benefits.

Noting the parallels with GC0133, the Workgroup have therefore considered these points for GC0109 in the “What is the impact of this change?” section of this document.

## What is the impact of this change?

### **Interactions with the Electricity Balancing Guideline (EBGL) Article 18**

The Electricity Balancing Guideline (EBGL) is a European Network Code introduced by the Third Energy Package European legislation in late 2017. The EBGL regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe's security of supply. Article 18 of the EBGL states that TSOs such as the ESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem.

There is a change process outlined in other EBGL Articles 4, 5, 6 & 10 on how a proposal should be submitted, approved by Ofgem, how it should be amended, and that there should be a one month public consultation.

ESO submitted terms and conditions for approval to Ofgem that included different sections of different GB network codes, BSC, CUSC and Grid Code, as well as some of the Standard Contract Terms (SCTs). This means that if any of those sections change through a modification, they will also legally have to go through a change process that meets the criteria set out in EBGL. However, GC0109 does not have any EBGL implications as it does not change the SCTs for Balancing Providers and places no obligation on market participants.

---

<sup>4</sup> <https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0133-timely-informing-gb-nets-system-state>

For Grid Code, it was agreed<sup>5</sup> that even if the Modification is not related to EBGL, a 1 month Code Administrator Consultation would be run – **therefore the Code Administrator Consultation will be run for 1 month.**

## Contents

- **What is the issue?**
- **What is the solution?**
  - Proposer's solution
  - Workgroup considerations
  - Potential solutions
  - Draft legal text
- **What is the impact of this change?**
- **When will the change take place?**
- **How to respond**
- **Acronyms, key terms and reference material**

## What is the issue?

There are various System Warning Alerts issued by or to the Network Operator(s), which currently are not shared in a timely manner to other market participants or may not be available at all to other market participants.

The Proposer considers that there is no timely publication of the various System Warning Alerts and not all market participants currently get these.

## What is the solution?

### Proposer's solution:

<p><b>Grid Code Changes</b> - Obligation in Grid Code for Network Operators to issue all System Warning Alerts<sup>6</sup> issued<sup>7</sup> or received (including whether they 'activate' or 'deactivate' an action) to market participants via ELEXON.</p>	<p><b>Publish on BMRS</b> - All System Warning Alerts to be sent by the ESO to ELEXON and issued on BMRS</p>	<p><b>Timing</b> – Window of 15 minutes (on a reasonable endeavours basis) from the ESO issuing the System Warning Alert to ELEXON for publication on the BMRS.</p> <p>Window of 20 minutes (on a reasonable endeavours basis) from the ESO</p>
--	--	---

<sup>5</sup> <https://www.nationalgrideso.com/document/171976/download>

<sup>6</sup> As proposed to be listed in Grid Code OC7 Appendix 2 – see Annex 4 for more details

<sup>7</sup> Or amended, or updated

		receiving the System Warning Alert to ELEXON. for publication on the BMRS.
--	--	--

The Proposer confirmed that the intention of GC0109 is for all the System Warning Alerts to be made available to all market participants at the same time. If all market participants are not notified at the same time, there may be market effects to the detriment of the smaller players in the market.

The Original Proposal included an indicative list of the items that should be captured within this change – the Original Proposal is set out in Annex 1 of this document.

## Workgroup Considerations

The Workgroup has convened 8 times to discuss the perceived issue, detail the scope of the proposed defect, devise potential solutions and assess the proposal in terms of the Applicable Code Objectives.

### Consideration of the Proposer's solution

#### Grid Code Changes

The Workgroup agreed four elements to the System Warning Alerts, which influence whether they form part of the GC0109 solution:

<p><b>Category 1: System Warning Alerts that are already defined in the Grid Code and have corresponding BSC requirements for them to be reported to ELEXON and published on the BMRS in accordance with BSC Section Q6.1.14 (System Warnings) and Q6.9.4 (Demand Control Instructions)</b></p>	<p><b><u>System Warnings</u></b></p> <ul style="list-style-type: none"> <li>• System Warning - EMN (Electricity Margin Notice) – definition in Grid Code OC7.4.8.5</li> <li>• System Warning – HRDR<sup>8</sup> (For Margin) – definition in Grid Code OC7.4.8.6(a)</li> <li>• System Warning – HRDR (For Local System Issues) – definition in Grid Code OC7.4.8.6(b)</li> </ul> <p><b><u>Demand Control Instructions</u></b></p> <ul style="list-style-type: none"> <li>• System Warning - Demand Control Imminent – definition in Grid Code OC6.5.2, OC7.4.8.2(c) and OC7.4.8.7</li> <li>• System Warning - Risk of System Disturbance – definition in Grid Code OC7.4.8.8</li> <li>• Demand Control by Demand Disconnection instructed by the ESO – definition in Grid Code OC6.5</li> <li>• Demand Control by voltage reduction instructed by the ESO – definition in Grid Code OC6.5</li> </ul>	<p>Not in Scope – already codified and published on BMRS</p>
---	--	--

<sup>8</sup> “High Risk of Demand Reduction”.

	<ul style="list-style-type: none"> <li>Automatic Low Frequency Demand Disconnection<sup>9</sup> instructed by the ESO – definition in Grid Code OC6.6</li> </ul>	
<p><b>Category 2 - System Warning Alerts which are currently defined in the Grid Code or Distribution Code but for which there is no Grid Code (or BSC) requirement for these to be published.</b></p>	<ul style="list-style-type: none"> <li>Demand Control (including voltage reduction and demand disconnection) - DNO activated – definition in Grid Code OC6.4 and DOC6.6</li> <li>Grid Code Emergency Instruction (to DNO) – definition in Grid Code BC2.9.1.4</li> <li>Grid Code Emergency Instruction (to Generators &amp; Demand – BCA, BEGA, &amp; BELLA) - definition in Grid Code BC2.9.1.3</li> <li>Grid Code Emergency Instruction (to Interconnectors) – definition in Grid Code BC2.9.1.4</li> <li>Distribution Code Emergency Action – defined in Distribution Code DOC7.6</li> <li>System NRAPM – definition in Grid Code BC1.5.5</li> <li>Localised NRAPM – definition in Grid Code BC1.5.5</li> <li>Cancellation of National Electricity Transmission System Warning – definition in Grid Code OC7.4.8.9</li> </ul>	<p>In Scope – requirement to be added to Grid Code</p> <p>System Warning Alerts to be published on BMRS</p>
<p><b>Category 3 - System Warning Alerts which are not currently published and are not referenced in Grid Code</b></p>	<ul style="list-style-type: none"> <li>Voltage Control DNO<sup>10</sup> contracted with the ESO</li> <li>STC Emergency Instruction (to TO)</li> <li>ESEC implementation</li> <li>Capacity Market Warning under EMR</li> <li>Interconnector Emergency Assistance Requests</li> <li>Demand Turn Up<sup>11</sup></li> </ul>	<p>In Scope – requirement to be added to Grid Code</p> <p>System Warning Alerts to be</p>

<sup>9</sup> Following the 9 August 2019 power outage, this was published as a Demand Control Instruction rather than a System Warning. As part of the actions from the 9 August 2019 power outage, there is a proposal being discussed to publish as a System Warning but this is yet to be agreed.

<sup>10</sup> Voltage Control DNO<sup>10</sup> notifications are outside the scope of the Grid Code<sup>10</sup>. The Proposer agreed he would look to review cross code implications from this modification and would raise any additional modifications required in other Codes. The Proposer confirmed a specific modification would be required in the BSC to cover the Voltage Control DNO notifications. Consideration needs to be given to how any System Warning Alerts would be issued across other Codes where relationships and contacts do not currently exist and whether existing arrangements could be utilised in this area.

<sup>11</sup> This was originally out of scope for GC0109; however, Workgroup on 12 November 2020 agreed to include within the GC0109 scope both because of the actions that the ESO took in summer 2020 due to Covid and the increasing amount of renewables on the NETS

		published on BMRS
<b>Category 4 - System Warning Alerts that the Workgroup and the Proposer do not currently consider needed to be included within the GC0109 solution.</b>	<ul style="list-style-type: none"> <li>• Grid Code Emergency Instruction (to Suppliers and A.N. Others)</li> <li>• Fuel Security Code Direction to TSO, DNO or Generator</li> </ul>	Out of Scope

Further details on each of these items is set out in Annex 3 of this document, including who issues the System Warning Alert, how is it issued, when and where it is published. This builds on the table that was provided within the Original Proposal.

**Workgroup Consultation question:** The Workgroup have set out four categories for the proposed items to be classified (or not) as System Warning Alerts and have noted that Category 1 System Warning Alerts are already published. The Workgroup have proposed that the System Warning Alerts in Categories 2 and 3 will need to be published and are within the scope of GC0109 whilst System Warning Alerts in Category 4 are outside the scope of GC0109. Do you agree with the Workgroup's list and do you think there is any System Warning Alerts that needs to be included or excluded from publication. Please provide the rationale for your response?

### Publish on BMRS

The ESO Workgroup Member confirmed that there is no electronic messaging sent to the whole industry. In certain situations, the ESO may call an impacted User or DNO, then following the call with confirmation via standard fax message as soon as possible. However, other communications are issued direct to ELEXON, for onward publication on BMRS.

The Workgroup discussed whether the ESO should notify ELEXON or market participants directly. The Workgroup concluded that the ESO doesn't necessarily know who all market participants are and therefore discounted simply extending the existing 'mailing list' used for any electronic alerting that is already issued at the time of a particular Warning.

The Workgroup agreed that central to the solution to be implemented would be publishing information that could be picked up by any market participant

ELEXON explained how the BMRS already supports the publication and communication of the Balancing Mechanism and transmission system related information to market participants and could be used to support GC0109. In particular, the BMRS is the primary channel for providing operational data relating to Great Britain's Electricity Balancing and Settlement arrangements. It publishes a wide range of near real-time and historical data about the operation of the Balancing Mechanism and overall composition of the wholesale electricity market, ESO's planning and operational forecasts and REMIT. The BMRS is an



open-data platform, available 24 hours a day and is free to use by any person<sup>12</sup>. The BMRS also supports data push and data pull services. Specifically BMRS:

- Allows any user (which includes all Market Participants) to establish APIs that pull data from the BMRS (in XML format) and request that BMRS pushes data, e.g. through its TIBCO service (i.e. pre-determined messages sent by BMRS in flat text file).
- For System Warnings, ELEXON has an email notification service (i.e. as soon as a warning is published on BMRS an email is sent to all subscribers).

### **The Workgroup agreed that the simplest solution is to place these additional System Warning Alerts on BMRS**

ELEXON summarised four options (the “BMRS Implementation Options”) that could make use of existing or new BMRS functionality.

Options 1 and 2 make use of existing functionality and therefore no system changes would be needed. However, Options 3 and 4 would need system changes and would be assessed by ELEXON in parallel with their wider review of BMRS design and functionality. **The Workgroup agreed that only Options 1 and 2 should be considered for the GC0109 solution.** The Workgroup concluded that Options 3 and 4 should not be considered for the GC0109 solution as waiting for a currently unknown implementation date would introduce further delay. Options 3 and 4 are though presented in this section for information to help the industry understand the possible future direction of travel.

#### **Option 1 - Extend the existing BSC System Warnings interface between the ESO and BMRS**

*BSC Section Q6.1.14 already requires the ESO to send BMRS details of System Warnings (as defined in OC7). The ESO does this by using a predefined free-text ‘System Warnings’ file (defined in the [Interface Definition Document](#)). Once received, BMRS publishes the content of the System Warnings file on the [BMRS](#). This ‘simple’ option would rely on the ESO expanding its use of the BSC ‘System Warnings’ interface to report on all the different warnings, instructions and notices required by GC0109.*

Pros	Cons
<ul style="list-style-type: none"> <li>• An established means for the ESO to report OC7 System Warnings to BMRS.</li> <li>• The ESO already uses this to report events other than OC7 System Warnings, e.g. Emergency Instructions or system outages</li> <li>• Uses a simple free text file, which provides the ESO with the</li> </ul>	<ul style="list-style-type: none"> <li>• System Warnings page on BMRS is basic – it only shows current or recent messages, which cannot be filtered, and does not provide a record of historical messages<sup>13</sup> that can be searched</li> <li>• Delay between the point the ESO or Network Operator sends a warning, instruction or notice to its primary recipient and the point at which details</li> </ul>

<sup>12</sup> Whilst BMRS can be easily viewed from most internet browsers, where a user wishes to pull data or have data pushed to it from BMRS, the participant would need to have its own system set up to receive this information and translate it into a readable format

<sup>13</sup> Historical system warnings can be accessed by registering to use the ELEXON portal

<p>flexibility to populate it as appropriate</p> <ul style="list-style-type: none"> <li>• Although the BSC minimum requirement is to publish within 5 minutes, in practice, data sent to BMRS can be published quicker</li> </ul>	<p>of that warning, instruction or notice are sent to and then published by BMRS</p> <ul style="list-style-type: none"> <li>• BSC System Warnings interface only supports communication between the ESO and BMRS. A BSC Modification, BSC system changes and DNO system changes would be required to enable DNOs to use this interface too</li> <li>• BSC Modification and/or Change Proposal may be required to clarify the use of the BSC System Warnings interface, i.e. that it is used for more than OC7 System Warnings</li> </ul>
---	--

### Option 2 – Continue with existing REMIT interface, extending it to the system warnings etc.

*The ELEXON Portal and BMRS support market participants' REMIT reporting by enabling them to send details of inside information to the BMRS using the [defined XML schemas](#). BMRS then publishes details of the REMIT inside information on its [REMIT webpage](#), which is accessible by anyone with an Internet connection. The ESO (and DNOs) could use the 'Other market information' XML schema to report on any of the warnings, notifications or instructions envisaged by GC0109.*

Pros	Cons
<ul style="list-style-type: none"> <li>• REMIT XML schemas are an established file format used by ESO and other market participants. DNOs may use the ELEXON Portal and the REMIT XML schemas too.</li> <li>• The REMIT XML schemas provide a structured file format, so REMIT messages contain certain defined data items, e.g. Market Participant, event status, event start date/time, event stop date/time, remarks.</li> <li>• The 'Remarks' data item is a 500-character free-text field that gives the sender the flexibility to provide information as appropriate.</li> <li>• The BMRS' REMIT webpage provides users with tools to review and filter current and historical events (the BMRS User Requirement Specification requires that inside information remains on the website for at least three years, though in</li> </ul>	<ul style="list-style-type: none"> <li>• BMRS would publish the warnings, instructions and notices identified by the proposer amongst other REMIT messages rather than on a dedicated webpage</li> <li>• There would be a delay between the point ESO or Network Operator sends a warning, instruction or notice to its primary recipient and the point at which details of that warning, instruction or notice are sent to and then published by BMRS.</li> </ul>

<p>practice details of events are published indefinitely).</p> <ul style="list-style-type: none"> <li>• The BSC requirement is to publish Inside Information Data as soon as reasonably practicable. In practice Inside Information Data sent to BMRS is published quickly – within seconds.</li> <li>• Users can already setup APIs to pull REMIT data published on BMRS, subscribe to receive TIBCO messages which push REMIT data to users or configure an RSS reader to view REMIT data which is also published as an RSS feed.</li> <li>• No BSC Changes required.</li> </ul>	
--	--

**Option 3 – Enhanced solution – update the BMRS’ System Warnings webpage or build a new dedicated webpage(s) that provides a record of current and historical warning, instructions and notices, and a searchability function**

*An enhanced solution could also establish new interfaces between ESO and BMRS, so different warnings, instructions and notices are reported using dedicated data flows. These dedicated data flows could ensure specific information is reported in respect of the different types of event or that the different events are published in dedicated tables or on separate, dedicated webpages.*

Pros	Cons
<ul style="list-style-type: none"> <li>• Would establish a dedicated webpage(s) on the BMRS for the warnings, notices and instructions covered by GC0109.</li> <li>• BMRS functionality could be tailored to support the specific needs of users interested in NG warnings, instructions and notices, e.g.                             <ul style="list-style-type: none"> <li>○ Specific requirements on how warnings, instructions or notices are published;</li> <li>○ Specific retention and search features; and</li> <li>○ New/updated notifications to users of when warnings, instructions or notices are published on the BMRS.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• BSC Modification required.</li> <li>• Assuming the BSC Modification is approved, it would require BSC system changes to build new functionality and establish new or update existing interfaces between ESO and BMRS.</li> <li>• There would be a delay between the point ESO or Network Operator sends a warning, instruction or notice to its primary recipient and the point at which details of that warning, instruction or notice are sent to and then published by BMRS.</li> <li>• BMRS’ REMIT reporting already provides comparable functionality.</li> </ul>

### Option 4 – Enhanced + solution – as per Option 3 and forward all notifications to industry before processing by ELEXON

*Any warning, instruction or notice sent by ESO to BMRS is automatically copied at the point it is sent by ESO and delivered to market participants that had subscribed to receive the message.*

Pros	Cons
<ul style="list-style-type: none"> <li>• Would aim to deliver details of warnings, instructions and notices to market participants within similar timescales as those being delivered to BMRS.</li> </ul>	<ul style="list-style-type: none"> <li>• BSC Modification required.</li> <li>• Assuming the BSC Modification is approved, it would require BSC system changes to build new functionality and establish new or update existing interfaces between ESO and BMRS.</li> <li>• There would be a delay between the point ESO or Network Operator sends a warning, instruction or notice to its primary recipient and the point at which details of that warning, instruction or notice are sent to and then published by BMRS.</li> <li>• Would likely require market participants wanting to receive the message to establish (and possibly pay for) a dedicated 'gateway' to receive the messages.</li> </ul>

The Workgroup have concluded that that Category 1, 2 and 3 System Warning Alerts (as set out in the “Grid Code changes” section of this document are in the scope of GC0109 and will need to be published. The Workgroup noted that the Category 1 System Warning Alerts are already published on BMRS.

Furthermore, of the four BMRS implementation options considered, only Options 1 and 2 will be in the scope of GC0109. The only differences are that for Option 2, the Category 2 and Category 3 System Warning Alerts would be published via REMIT rather than BMRS; and no BSC changes are expected for Option 2. The ELEXON representative on the Workgroup noted that REMIT provides additional functionality<sup>14</sup> to that provided by BMRS. However, in the interests of minimal change, there are no plans to move those Category 1 System Warning Alerts published on BMRS to REMIT.

**Workgroup Consultation question:** The Workgroup have considered 4 different BMRS Implementation Options and agree that Options 1 and 2 only are suitable for the scope of GC0109. Which of Option 1 or Option 2 do you prefer? Please provide the rationale for your response.

<sup>14</sup> e.g. REMIT has searchability functions

**Timing**

ESO have different requirements in terms of timing for such System Warning Alerts in the Grid Code and BSC. The table below illustrates this point:

Timing Requirements for ESO	Example
Issue details to ELEXON within a set period of time	Demand Control events must be reported within 15 minutes
Report as soon as practicable	Acceptances that are Emergency Instructions
At same time as another event	ESO should send details of System Warnings to ELEXON at the same time it issues the System Warning Alert to a User(s)

The Proposer noted that some of these communications may be verbal. However, the ESO Workgroup Member confirmed that all verbal communications it issues or receives in respect of System Warning Alerts are followed up with electronic notification.

In the BSC, ELEXON then has a general requirement to publish things it receives from the ESO on BMRS within 5 minutes (although in practice ELEXON publishes within seconds of receipt).

The Proposer is concerned about the time delay from the System Warning Alert taking place and the details of the System Warning Alerts being made available to all other market participants via BMRS. The Workgroup supported this view and concluded that all notifications should be made available to all market participants as soon as feasible. As BMRS is being used, there will inevitably be a short time lag between the System Warning Alert taking place, ESO issuing the System Warning Alert and ELEXON publishing on BMRS. Proposer was keen to have a maximum time window of 15 minutes for this process where ESO is issuing and 20 minutes where the ESO is in receipt of such System Warning Alert.

**Workgroup Consultation question:** The Proposer has suggested a time window of 15 minutes (on a reasonable endeavours basis) for the ESO to issue the System Warning Alert to ELEXON for publication on the BMRS; and a time window of 20 minutes (on a reasonable endeavours basis) from the ESO receiving the System Warning Alert to issue to ELEXON for publication on the BMRS. Do you agree that these time windows are suitable? Please provide the rationale for your response.

**Draft Legal text**

The draft legal text for this change can be found in Annex 4 of this document.

It proposes a new section within OC7, and a new Appendix in table format, listing the new System Warnings.

## What is the impact of this change?

### **Transparency, EU Compliance and End Consumer Benefit**

The Proposer believes that ensuring that there is open and transparent access for market participants to market relevant information will support both the GB market as well as cross-border trade within the (UK) Member State and with other Member States.

It will also minimise the risk that certain market participants (such as network operators) could trade on insider information ahead of other market participants.

In terms of transparency (as has been widely recognised and accepted by BEIS, Ofgem<sup>15</sup>, the ESO and stakeholders amongst others), improvements will lead to a much more efficient and competitive market which, will, in turn, achieve improved benefits, such as lower costs, for end consumers.

The Proposer considers that the benefits of ensuring and enhancing transparency of transmission system operations have already been well demonstrated by both ENTSOE<sup>16</sup>, ACER and the EU Commission in SOGL and notes there are associated legal compliance obligations on the ESO, DSOs and Ofgem to that effect.

Publishing the System Warning Alerts will provide transparency for market participants and stakeholders so they have confidence that the GB NETS is operating robustly in the event of uncertain circumstances (which have warranted, or may warrant, the issuing of System Warning Alerts).

Since GC0109 was raised, clarification has been provided by the UK Government as to the enduring legal status of the European Network Codes etc., which have now been incorporated into UK law as Retained EU Law<sup>17</sup>.

### **Process and System Changes/Implementation Costs**

The level of system changes (arising from GC0109) will depend on which of the BMRS Implementation Options is taken forward. The Workgroup have agreed that only Options 1 and 2 are viable at this time and for both of these the level of system changes (and thus cost) is expected to be minimal (as it uses existing systems, procedures etc.).

---

<sup>15</sup> Ofgem, in their decision letter on not granting Urgent treatment for GC0109 specifically asked the ESO to explore whether there are ways to increase transparency around system warnings as soon as possible, and potentially outside of the industry codes process if appropriate

<sup>16</sup> As ENTSOE noted, at the start of the development of the Network Codes:

*“Transparency is essential to achieve well-functioning, efficient, liquid and competitive wholesale markets.” and “...transparency is the foundation for creating a level playing field thus increasing competition between different market players”*

<https://www.entsoe.eu/2010/03/09/entso-e-publishes-transparency-policy/>

<sup>17</sup> Further information can be found in <https://www.legislation.gov.uk/eur/2019/943/contents> and [https://www.legislation.gov.uk/ukxi/2020/96/pdfs/ukxiem\\_20200096\\_en.pdf](https://www.legislation.gov.uk/ukxi/2020/96/pdfs/ukxiem_20200096_en.pdf)

ELEXON agreed with the Workgroup's view on Options 1 and 2; however, they indicated that a BSC change may be required to make clear which System Warning Alerts are being sent, how and when. The need for a BSC change may be negated if the ESO's legal text changes provide the clarity that the BSC change would seek to achieve.

ESO's ENCC expect that their costs of implementation will be minimal (~ £10K).

### iDNOs

As part of the Terms of Reference, the Panel specifically asked the Workgroup to consider the implications on iDNOs. The Proposer noted that currently the iDNOs do not provide System Warning Alerts to the ESO and GC0109 does not seek to specifically obligate iDNOs. However, if in future the iDNOs did provide System Warning Alerts to the ESO, then the expectation would be that the ESO would issue these to ELEXON to publish via BMRS.

**Workgroup Consultation question:** In the "What is the Impact of this Change" section, the Workgroup has set out the benefits and/or costs of this change. Do you agree with the Workgroup's view and are there any additional benefits and/or costs to set out? Please provide the rationale for your response.

### Proposer's Assessment against Grid Code Objectives

Impact of the modification on the Applicable Objectives:	
Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	<b>Neutral</b>
(b) 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);	<b>Positive</b> - <i>The proposed solution will facilitate competition in the generation and supply of electricity ensuring that all market participants have equal and timely access to information of relevance to the market</i>
(c) Subject to sub-paragraphs (a) and (b), 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;	<b>Neutral</b>

<p>(d) 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</p>	<p><b>Positive</b> - <i>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</i></p> <p><i>This proposal ensures openness and transparency around the Warnings etc., that are available to market participants. Without full visibility of this information some market participants will be placed at a disadvantageous position compared to others.</i></p> <p><i>Furthermore, this modification ensures GB compliance with EU legislation in a timely manner and does so in a way that is not more stringent than EU law permits.</i></p>
<p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</p>	<p><b>Positive</b> - <i>The publication either in a single location (BMRS) or via a set means of electronic notification channel – such as email or text/SMS - of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc., issued by or to the Network Operator(s) will help market participants to find this important information, without the need to source it from differing locations within numerous websites / channels (for each of the parties concerned). Therefore, this proposal will promote the efficiency in the implementation and administration of the Grid Code arrangements.</i></p>

**Standard Workgroup Consultation question:** Do you believe that the GC0109 Original solution better facilitates the Applicable Objectives?



**When will this change take place?****Implementation date:**

10 working days after Authority decision (on the assumption that either of BMRS Implementation Options 1 or 2 are carried forward).

**Date decision required by:**

As soon as reasonably practicable.

**Standard Workgroup Consultation question:** Do you support the implementation approach?

## How to respond

### Standard Workgroup Consultation questions:

1. Do you believe that the GC0109 Original solution better facilitates the Applicable Objectives?
2. Do you support the proposed implementation approach?
3. Do you have any other comments?
4. Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?

### Specific Workgroup Consultation questions:

5. The Workgroup have set out four categories for the proposed items to be classified (or not) as System Warning Alerts and have noted that Category 1 System Warning Alerts are already published. The Workgroup have proposed that the System Warning Alerts in Categories 2 and 3 will need to be published and are within the scope of GC0109 whilst System Warning Alerts in Category 4 are outside the scope of GC0109. Do you agree with the Workgroup's list and do you think there is any System Warning Alerts that needs to be included or excluded from publication? Please provide the rationale for your response.
6. The Workgroup have considered 4 different BMRS Implementation Options and agree that Options 1 and 2 only are suitable for the scope of GC0109. Which of Option 1 or Option 2 do you prefer?. Please provide the rationale for your response.
7. The Proposer has suggested a time window of 15 minutes (on a reasonable endeavours basis) for the ESO to issue the System Warning Alert to ELEXON for publication on the BMRS; and a time window of 20 minutes (on a reasonable endeavours basis) from the ESO receiving the System Warning Alert to issue to ELEXON for publication on the BMRS. Do you agree that these time windows are suitable? Please provide the rationale for your response.
8. In the "What is the Impact of this Change" section, the Workgroup has set out the benefits and costs of this change. Do you agree with the Workgroup's view and are there are additional benefits and/or costs to set out? Please provide the rationale for your response.

The Workgroup is seeking the views of Grid Code Users and other interested parties in relation to the issues noted in this document and specifically in response to the questions above.

Please send your response to [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com) using the response pro-forma which can be found [here](#).

In accordance with Governance Rules if you wish to raise a Workgroup Consultation Alternative Request please fill in the form which you can find [here](#).

*If you wish to submit a confidential response, please note that information provided in response to this consultation will be published on National Grid ESO's website unless the response is clearly marked "Private & Confidential", we will contact you to establish the extent of the confidentiality. A response marked "Private & Confidential" will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the CUSC Modifications Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response. Please note an automatic confidentiality disclaimer generated by your IT System will not in itself, mean that your response is treated as if it had been marked "Private and Confidential".*

**Acronyms, key terms and reference material**

Acronym / key term	Meaning
ACER	European Union Agency for the Cooperation of Energy Regulators
API	Application Programming Interface  (a set of functions and procedures allowing the creation of applications that access the features or data of an operating system, application, or other service)
Baseline	The code/standard as it is currently
BC	Balancing Code (a section of the Grid Code)
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and Settlement Code
DNO	Distribution Network Operator
DSO	Distribution System Operator
EBGL	Electricity Balancing Guideline
EMR	Electricity Market Reform
ENCC	Electricity National Control Centre
ESEC	Electricity Supply Emergency Code
GB	Great Britain
GUI	Graphic User Interface
HRDR	High Risk of Demand Reduction
IDNO	Independent Distribution Network Operators
OC	Operating Code (a section of the Grid Code)
OFTO	Offshore Transmission Owner
NETS	National Electricity Transmission System
NGET	National Grid Electricity Transmission
NRAPM	Negative Reserve Active Power Margin
REMIT	Regulation on Wholesale Energy Markets Integrity and Transparency
RSS	A type of web feed which allows users and applications to access updates to websites in a standardised, computer-readable format
TIBCO	A software company
TSO	Transmission System Operator
XML	eXtensible Markup Language  (This is designed to store and transport data)

**Reference material:**

None

**Annexes**

Annex	Information
Annex 1	GC0109 Proposal Form
Annex 2	Terms of Reference
Annex 3	System Warning Alerts
Annex 4	GC0109 Legal Text