

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

We have set out below the specific sections of the Grid Code^{1,2} that we propose to amend using our transitional powers subject to schedule 12 to the Energy Act 2023, which we are seeking feedback on as part of this consultation. Proposed deletions are shown in strike-through, and proposed new text is double underlined. Text in red shows changes that have been made to the code text since the August 2025 decision publication, which include changes to ensure that the legal text is up to date, that the correct sections of codes have been updated, and that changes are consistent as far as possible.³ For brevity, we have not reproduced entire sections of the code in this annex. Instead, we have included only the parts of the code that are proposed to change, along with other parts we consider most relevant to understanding those changes. Whilst we have attempted to ensure that our proposed legal text drafting remains accurate as compared to the most up-to-date versions of the code text, we would welcome your highlighting of any parts of the code text proposed here that are out-of-date.

The Grid Code⁴ ([The Grid Code](#))

GLOSSARY & DEFINITIONS (GD)

GD.1 In the Grid Code the following words and expressions shall, unless the subject matter or context otherwise requires or is inconsistent therewith, bear the following meanings:

Prioritisation Criteria has the meaning given to that term by the Authority Guidance on Code Modification Prioritisation.

Prioritisation Category has the meaning given to that term by the Authority Guidance on Code Modification Prioritisation.

¹ The Grid Code has been designated as ‘qualifying document’ by the Secretary of State as part of the [Designation Notice \(amended and consolidated\) under paragraphs 1\(1\)\(b\) and 1\(5\) of Schedule 12 to the Energy Act 2023 designating certain documents and central systems for the purposes of Schedule 12 to the Energy Act 2023](#)

² The prioritisation policy that we propose to introduce through this consultation relates to code processes before code manager appointment. We intend to keep the provisions under review, and if amendments are required in the future to account for the introduction of a code manager, a consultation will be carried out.

³ [Decision on the preliminary Strategic Direction Statement and governance arrangements for industry codes | Ofgem](#)

⁴ [The Grid Code](#)

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

Authority Guidance on Code Modification Prioritisation means the guidance published by the Authority from time to time on code modification prioritisation.

GOVERNANCE RULES (GR)

PART B

GR.3 THE GRID CODE REVIEW PANEL

GR.3.2 Functions of the Grid Code Review Panel and the Code Administrator's Role

(a) The Grid Code Review Panel shall have the functions assigned to it in these Governance Rules.

(b) Without prejudice to GR.3.2(a) and to the further provisions of these Governance Rules, the Grid Code Review Panel shall endeavour at all times to operate:

(i) in an efficient, economical and expeditious manner, taking account of the Prioritisation Criteria, and whether particular Grid Code Modification Proposals are determined to be Urgent Modifications, or if they have been determined to not be Urgent Modifications, the Prioritisation Category complexity, importance and urgency of particular Grid Code Modification Proposals; and

(ii) with a view to ensuring that the Grid Code facilitates achievement of the Grid Code Objectives.

PART C

GR.13 GRID CODE MODIFICATION REGISTER

GR.13.3 The Grid Code Modification Register shall record in respect of current outstanding Grid Code Review Panel business:

(a) details of each Grid Code Modification Proposal (including the name of the Proposer, the date of the Grid Code Modification Proposal and a brief description of the Grid Code Modification Proposal);

(b) whether such Grid Code Modification Proposal is an Urgent Modification;

(c) the current status and progress of each Grid Code Modification Proposal, if appropriate the anticipated date for reporting to the Authority in respect thereof, and whether it has been withdrawn, rejected or implemented for a period of

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

three (3) months after such withdrawal, rejection or implementation or such longer period as the Authority may determine;

(d) the current status and progress of each Approved Modification, each Approved Grid Code Self-Governance Proposal, and each Approved Fast Track Proposal; ~~and~~

(e) such other matters as the Grid Code Review Panel may consider appropriate from time to time to achieve the purpose of GR.13.2.; and

(f) where such Grid Code Modification Proposal has been determined not to be an Urgent Modification, the Prioritisation Category accorded to the Grid Code Modification Proposal, and details of the assessment of each Grid Code Modification Proposal against the Prioritisation Criteria carried out in GR18.10.

(g) where the Prioritisation Category of a Grid Code Modification Proposal is changed, this change should be reflected within the Modification Register alongside the reasons for its change.

GR.15 GRID CODE MODIFICATION PROPOSALS

GR.15.3 A Grid Code Modification Proposal shall be submitted in writing to the Panel Secretary and, subject to the provisions of GR.15.4 below, shall contain the following information in relation to such proposal:

(a) the name of the Proposer;

(b) the name of the representative of the Proposer who shall represent the Proposer in person for the purposes of this GR.15;

(c) a description (in reasonable but not excessive detail) of the issue or defect which the proposed modification seeks to address;

(d) a description (in reasonable but not excessive detail) of the proposed modification and of its nature and purpose;

(e) where possible, an indication of those parts of the Grid Code which would require amendment in order to give effect to (and/or would otherwise be affected by) the proposed modification and an indication of the nature of those amendments or effects;

(f) the reasons why the Proposer believes that the proposed modification would better facilitate achievement of the Grid Code Objectives as compared with the current version of the Grid Code together with background information in support thereof;

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

(g) the reasoned opinion of the Proposer as to why the proposed modification should not fall within a current Significant Code Review, whether the proposed modification should be treated as a Self-Governance Modification or whether the proposed modification fails to meet the Self- Governance Criteria and as a result should proceed along the Standard Modification route;

(h) the reasoned opinion of the Proposer as to whether that impact is likely to be material and if so an assessment of the quantifiable impact of the proposed modification on greenhouse gas emissions, to be conducted in accordance with such current guidance on the treatment of carbon costs and evaluation of the greenhouse gas emissions as may be issued by the Authority from time to time;

(i) where possible, an indication of the impact of the proposed modification on Core Industry Documents and the STC;

(j) where possible, an indication of the impact of the proposed modification on relevant computer systems and processes used by Users.

(k) whether or not (and to the extent) that in the proposer’s view the Grid Code Modification Proposal constitutes an amendment to the Regulated Sections of the Grid Code; and

(l) an assessment by the Proposer of the Grid Code Modification Proposal against the Prioritisation Criteria.

GR.18 GRID CODE MODIFICATION PROPOSAL EVALUATION

GR.18.10 Where such Grid Code Modification Proposal has been determined not to be an Urgent Modification, the Grid Code Review Panel shall undertake an assessment of such Grid Code Modification Proposal against the Prioritisation Criteria to determine its Prioritisation Category, as compared with other Pending Grid Code Modification Proposals, and, taking into account the Proposer’s opinion provided pursuant to Clause GR.15.3 (l).

GR.19 PANEL PROCEEDINGS

GR.19.1

(a) The Code Administrator and the Grid Code Review Panel shall together establish a timetable to apply for the Grid Code Modification Proposal process. That timetable must comply with any direction(s) issued by the Authority setting and/or amending a timetable in relation to a Grid Code Modification Proposal that is in the respect of a Significant Code Review.

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

(b) The Grid Code Review Panel shall establish the part of the timetable for the consideration by the Grid Code Review Panel and by a Workgroup (if any) which shall be no longer than six months unless in any case the particular circumstances of the Grid Code Modification Proposal (taking due account of the Prioritisation Criteria, and whether the Grid Code Modification Proposal is an Urgent Modification, or, if it has been determined to not be an Urgent Modification, in accordance with section GR.23, the Prioritisation Category of the the Grid Code Modification Proposal, its complexity, importance and urgency) justify an extension of such timetable, and provided the Authority, after receiving notice, does not object, taking into account all those issues.

(c) The Code Administrator shall establish the part of the timetable for the consultation to be undertaken by the Code Administrator under these Governance Rules and separately the preparation of a Grid Code Modification Report to the Authority. Where the particular circumstances of the Grid Code Modification Proposal (taking due account of the Prioritisation Criteria, and whether the Grid Code Modification Proposal is an Urgent Modification, or, if it has been determined to not be an Urgent Modification, in accordance with section GR.23, the Prioritisation Category of the the Grid Code Modification Proposal, its complexity, importance and urgency) justify an extension of such timescales and provided the Authority, after receiving notice, does not object, taking into account all those issues, the Code Administrator may revise such part of the timetable.

(d) In setting such a timetable, the Grid Code Review Panel and the Code Administrator shall exercise their respective discretions such that, in respect of each Grid Code Modification Proposal, a Grid Code Modification Report may be submitted to the Authority as soon after the Grid Code Modification Proposal is made as is consistent with the proper evaluation of such Grid Code Modification Proposal, taking due account of its complexity, importance and urgency: the Prioritisation Criteria, and whether the Grid Code Modification Proposal is an Urgent Modification, or, if it has been determined to not be an Urgent Modification, in accordance with section GR.23, the Prioritisation Category of the the Grid Code Modification Proposal.

(e) Where Grid Code Modification Proposals have been determined to not be Urgent Modifications, in accordance with section GR.23, and having regard to the Prioritisation Criteria and the assessment provided by the Proposer in paragraph 15.3 (l) complexity, importance and urgency of particular Grid Code Modification Proposals, the Grid Code Review Panel may determine the Priorityisation Category of Grid Code Modification Proposals, as compared with other Pending Grid Code Modification Proposals, and may (subject to any objection from the Authority taking into account all those issues) adjust the Priorityisation Category of the relevant Grid Code Modification Proposal accordingly.

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

GR.19.3 The Grid Code Review Panel may decide to amalgamate a Grid Code Modification Proposal with one or more other Grid Code Modification Proposals where the subject-matter of such Grid Code Modification Proposals is sufficiently proximate to justify amalgamation on the grounds of efficiency and/or where such Grid Code Modification Proposals are logically dependent on each other. Such amalgamation may only occur with the consent of the Proposers of the respective Grid Code Modification Proposals. The Authority shall be entitled to direct that a Grid Code Modification Proposal is not amalgamated with one or more other Grid Code Modification Proposals.

GR.19.4 Without prejudice to each Proposer's right to withdraw their Grid Code Modification Proposal prior to the amalgamation of their Grid Code Modification Proposal where Grid Code Modification Proposals are amalgamated pursuant to GR.19.3:

(a) such Grid Code Modification Proposals shall be treated as a single Grid Code Modification Proposal;

(b) references in these Governance Rules to a Grid Code Modification Proposal shall include and apply to a group of two or more Grid Code Modification Proposals so amalgamated; ~~and~~

(c) the Proposers of each such Grid Code Modification Proposal shall cooperate in deciding which of them is to provide a representative for any Workgroup in respect of the amalgamated Grid Code Modification Proposal and, in default of agreement, the Panel Chairperson shall nominate one of the Proposers for that purpose; ~~and~~

(d) the Panel shall determine the amalgamated Grid Code Modification Proposal to have a single Prioritisation Category by considering the Prioritisation Categories accorded to them (and the relevant assessments undertaken in determining these Prioritisation Categories), and determining an appropriate amalgamated Prioritisation Category.

GR.22 GRID CODE MODIFICATION REPORTS

GR.22.2 The matters to be included in a Grid Code Modification Report shall be the following (in respect of the Grid Code Modification Proposal):

(a) A description of the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s), including the details of, and the rationale for, any variations made (or, as the case may be, omitted) by the Proposer together with the views of the Workgroup;

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

(b) the Panel Members' Recommendation;

(c) a summary (agreed by the Grid Code Review Panel) of the views (including any recommendations) from Panel Members in the Grid Code Review Panel Recommendation Vote and the conclusions of the Workgroup (if there is one) in respect of the Grid Code Modification Proposal and of any Workgroup Alternative Grid Code Modification(s);

(d) an analysis of whether (and, if so, to what extent) the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s) would better facilitate achievement of the Grid Code Objective(s) with a detailed explanation of the Grid Code Review Panel's reasons for its assessment, including, where the impact is likely to be material, an assessment of the quantifiable impact of the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s) on greenhouse gas emissions, to be conducted in accordance with such current guidance on the treatment of carbon costs and evaluation of the greenhouse gas emissions as may be issued by the Authority from time to time, and providing a detailed explanation of the Grid Code Review Panel's reasons for that assessment;

(e) an analysis of whether (and, if so, to what extent) any Workgroup Alternative Grid Code Modification(s) would better facilitate achievement of the Grid Code Objective(s) as compared with the Grid Code Modification Proposal and any other Workgroup Alternative Grid Code Modification(s) and the current version of the Grid Code, with a detailed explanation of the Grid Code Review Panel's reasons for its assessment, including, where the impact is likely to be material, an assessment of the quantifiable impact of the Workgroup Alternative Grid Code Modification(s) on greenhouse gas emissions, to be conducted in accordance with such current guidance on the treatment of carbon costs and evaluation of the greenhouse gas emissions as may be issued by the Authority from time to time, and providing a detailed explanation of the Grid Code Review Panel's reasons for that assessment;

(f) the Proposed Implementation Date taking into account the views put forward during the process described at GR.21.4 (b) such date to be determined by the Grid Code Review Panel in the event of any disparity between such views and those of the Code Administrator;

(g) an assessment of:

(i) the impact of the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s) on the Core Industry Documents and the STC;

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

(ii) the changes which would be required to the Core Industry Documents and the STC in order to give effect to the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s);

(iii) the mechanism and likely timescale for the making of the changes referred to in (ii);

(iv) the changes and/or developments which would be required to central computer systems and, if practicable, processes used in connection with the operation of arrangements established under the Core Industry Documents and the STC;

(v) the mechanism and likely timescale for the making of the changes referred to in (iv);

(vi) an estimate of the costs associated with making and delivering the changes referred to in (ii) and (iv), such costs are expected to relate to: for (ii) the costs of amending the Core Industry Document(s) and STC and for (iv) the costs of changes to computer systems and possibly processes which are established for the operation of the Core Industry Documents and the STC, together with an analysis and a summary of representations in relation to such matters, including any made by Small Participants, the Citizens Advice and the Citizens Advice Scotland;

(vii) where such Grid Code Modification Proposal has been determined not to be an Urgent Modification, details of the assessment of each Grid Code Modification Proposal against the Prioritisation Criteria, to determine its Prioritisation Category, in accordance with paragraph GR18.10;

(h) to the extent such information is available to the Code Administrator, an assessment of the impact of the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s) on Users in general (or classes of Users in general), including the changes which are likely to be required to their internal systems and processes and an estimate of the development, capital and operating costs associated with implementing the changes to the Grid Code and to Core Industry Documents and the STC;

(i) copies of (and a summary of) all written representations or objections made by consultees during the consultation in respect of the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s) and subsequently maintained;

(j) a copy of any impact assessment prepared by Core Industry Document Owners and the STC committee and the views and comments of the Code Administrator in respect thereof;

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

(k) whether or not, in the opinion of The Company, the Grid Code Modification Proposal (or any Workgroup Alternative Grid Code Modification(s)) should be made.

(l) The Company's justification for including or not including the views resulting from the relevant consultation in the Grid Code Modification Report.

(m) where a Grid Code Modification Proposal or any Workgroup Alternative Grid Code Modification(s) constitutes an amendment to the areas set out in table 1 of the GR.B annex which details the Regulated Sections, the expected impact on the objectives of Assimilated Law (Commission Regulation (EU) 2017/2195).

GR.22.12 If a Grid Code Modification Report is to be revised and re-submitted in accordance with a direction issued pursuant to GR.22.11, it shall be re-submitted as soon after the Authority's direction as is appropriate (and in the case of an amendment to the areas set out in table 1 of the GR.B annex which details the Regulated Sections of the code within 2 months), taking into account the Prioritisation Criteria, and whether the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s) are Urgent Modifications, or, if they have been determined to not be Urgent Modifications, in accordance with section GR.23, the Prioritisation Category ~~complexity, importance and urgency~~ of the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s). The Grid Code Review Panel shall decide on the level of analysis and consultation required in order to comply with the Authority's direction and shall agree an appropriate timetable for meeting its obligations. Once the Grid Code Modification Report is revised, the Grid Code Review Panel shall carry out its Grid Code Review Panel Recommendation Vote again in respect of the revised Grid Code Modification Report and re-submit it to the Authority in compliance with GR.22.4 to GR.22.6.

GR.23 URGENT MODIFICATIONS

GR.23.1 If a Relevant Party recommends to the Panel Secretary that a proposal should be treated as an Urgent Modification in accordance with this GR.23, the Panel Secretary shall notify the Panel Chairperson who shall then, in accordance with GR.23.2 (a) to (e) inclusive, and notwithstanding anything in the contrary in these Governance Rules, endeavour to obtain the views of the Grid Code Review Panel as to the matters set out in GR.23.3. If for any reason the Panel Chairperson is unable to do that, the Panel Secretary shall attempt to do so (and the measures to be undertaken by the Panel Chairperson in the following paragraphs shall in such case be undertaken by the Panel Secretary).

GR.23.2 (a) The Panel Chairperson shall determine the time by which, in their opinion, a decision of the Grid Review Panel is required in relation to such matters, having regard to the degree of urgency in all circumstances, and references in this GR.23.1 to the

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

“time available” shall mean the time available, based on any such determination by the Panel Chairperson;

(b) The Panel Secretary shall, at the request of the Panel Chairperson, convene a meeting or meetings (including meetings by telephone conference call, where appropriate) of the Grid Code Review Panel in such manner and upon such notice as the Panel Chairperson considers appropriate, and such that, where practicable within the time available, as many Panel Members as possible may attend;

(c) Each Panel Member shall be deemed to have consented, for the purposes of GR.8.9. to the convening of such meeting or meetings in the manner and on the notice determined by the Panel Chairperson. GR.8.10 shall not apply to any such business.

(d) Where:

(i) it becomes apparent, in seeking to convene a meeting of the Grid Code Review Panel within the time available, that quorum will not be present; or

(ii) it transpires that the meeting of the Grid Code Review Panel is not quorate and it is not possible to rearrange such meeting within the time available, the Panel Chairperson shall endeavour to contact each Panel Member individually in order to ascertain such Panel Member’s vote, and (subject to GR.23.2 (e)) any matter to be decided shall be decided by a majority of those Panel Members who so cast a vote. Where, for whatever reason no decision is reached, the Panel Chairperson shall proceed to consult with the Authority in accordance with GR.23.5;

(e) Where the Panel Chairperson is unable to contact at least four Panel Members within the time available and where:

(i) It is only The Company, who has recommended that the proposal should be treated as an Urgent Modification, then those Panel Members contacted shall decide such matters, such decision may be a majority decision. Where in such cases no decision is made for whatever reason, the Panel Chairperson shall proceed to consult with the Authority in accordance with GR.23.5; or

(ii) any User (including any Authorised Electricity Operator; The Company or a Materially Affected Party), the Citizens Advice or the Citizens Advice Scotland has recommended that the proposal should be treated as an Urgent Modification, then the Panel Chairperson may decide the matter (in consultation with those Panel Members (if any) which they manage to contact) provided that the Panel Chairperson shall include details in the

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

relevant Grid Code Modification Report of the steps which they took to contact other Panel Members first.

GR.23.3 The matters referred to in GR.23.1 are:

(a) whether such proposal should be treated as an Urgent Modification in accordance

with this GR.23 and

(b) the procedure and timetable to be followed in respect of such Urgent Modification.

GR.23.4 The Panel Chairperson or, in their absence, the Panel Secretary shall forthwith provide the Authority with the recommendation (if any) ascertained in accordance with GR.23.2 to (e) inclusive, of the Grid Code Review Panel as to the matters referred to in GR.23.2, and shall consult the Authority as to whether such Grid Code Modification Proposal is an Urgent Modification and, if so, as to the procedure and timetable which should apply in respect thereof.

GR.23.5 If the Grid Code Review Panel has been unable to make a recommendation in accordance with GR.23.2.(d) or GR.23.2(e) as to the matters referred to in GR.23.3 then the Panel Chairperson or, in their absence, the Panel Secretary may recommend whether they consider that such proposal should be treated as an Urgent Modification and shall forthwith consult the Authority as to whether such Grid Code Modification Proposal is an Urgent Modification and, if so, as to the procedure and timetable that should apply in respect thereof.

GR.23.6 The Grid Code Review Panel shall:

(a) not treat any Grid Code Modification Proposal as an Urgent Modification except with the prior consent of the Authority;

(b) comply with the procedure and timetable in respect of any Urgent Modification approved by the Authority; and

(c) comply with any direction of the Authority issued in respect of any of the matters on which the Authority is consulted pursuant to GR.23.4 or GR.23.5.

GR.23.7 For the purposes of this GR.23.7, the procedure and timetable in respect of an Urgent Modification may (with the approval of the Authority pursuant to GR.23.4 or GR.23.5) deviate from all or part of the Grid Code Modification Procedures or follow any other procedure or timetable approved by the Authority except for the duration of the Code Administrator consultation for modifications relating to Regulated Sections which

Consultation – Annex F: Proposed legal drafting of code modification prioritisation procedure – Grid Code

shall be for one month. Where the procedure and timetable approved by the Authority in respect of an Urgent Modification do not provide for the establishment (or designation) of a Workgroup the Proposer's right to vary the Grid Code Modification Proposal pursuant to GR.15.10 and GR.20.26 shall lapse from the time and date of such approval.

GR.23.8 The Grid Code Modification Report in respect of an Urgent Modification shall include:

- (a) a statement as to why the Proposer believes that such Grid Code Modification Proposal should be treated as an Urgent Modification;
- (b) any statement provided by the Authority as to why the Authority believes that such Grid Code Modification Proposal should be treated as an Urgent Modification;
- (c) any recommendation of the Grid Code Review Panel (or any recommendation of the Panel Chairperson) provided in accordance with GR.23 in respect of whether any Grid Code Modification Proposal should be treated as an Urgent Modification; and
- (d) the extent to which the procedure followed deviated from the process for Standard Modifications (other than the procedures in this GR.23).

GR.23.9 Each Panel Member shall take all reasonable steps to ensure that an Urgent Modification is considered, evaluated and (subject to the approval of the Authority) implemented as soon as reasonably practicable, having regard to the urgency of the matter and, for the avoidance of doubt, an Urgent Modification may (subject to the approval of the Authority) result in the Grid Code being amended on the day on which such proposal is submitted.

GR.23.10 Where an Urgent Modification results in an amendment being made in accordance with GR.25, the Grid Code Review Panel may or (where it appears to the Grid Code Review Panel that there is a reasonable level of support for a review amongst Users) shall following such amendment, establish a Workgroup on terms specified by the Grid Code Review Panel to consider and report as to whether any alternative amendment could, as compared with such amendment better facilitate achieving the Grid Code Objectives in respect of the subject matter of that Urgent Modification.

GR.27 REVIEW OF PRIORITISATION CATEGORY OF MODIFICATION PROPOSALS

GR.27.1 The Grid Code Review Panel shall review the Prioritisation Category of Modification Proposals on a bi-annual basis and adjust the relevant modification timetable for each Modification Proposal accordingly.