

## **Grid Code (GC) GC0174: Review of obligations to provide EU Transparency Availability Data as specified in OC2.4.7**

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**Decision:** The Authority<sup>1</sup> directs<sup>2</sup> that the proposed modification to the Grid Code (GC) be made

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**Target audience:** National Energy System Operator (NESO), the Grid Code Review Panel, Grid Code users and other interested parties

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**Date of publication:** 28 November 2025

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**Implementation date:** 10 working days after the Authority decision

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### **Background**

Following the United Kingdom (UK) leaving the European Union (EU), the UK Government has incorporated various EU regulations into Assimilated Law<sup>3</sup> with some changes to certain requirements. The European Transparency Regulation (ETR) (Commission Regulation (EU) 543/2013) has been incorporated into Assimilated Law with minimal changes to the text. However, details relating to the central publishing platform have altered. The Assimilated Law has changed the “Central Information Transparency Platform” to the “Reporting Service”, which is currently the Elexon Insights website Regulation on wholesale Energy Markets Integrity and Transparency (REMIT) page.<sup>4</sup>

Upon approval of Balancing and Settlement Code (BSC) Modification Change Proposal CP1583<sup>5</sup>, Rationalising publication of ETR data on Elexon Systems, the obligation for parties to submit EU Transparency Availability Data as specified in Operating Code (OC)

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<sup>1</sup> References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) support GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

<sup>2</sup> This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

<sup>3</sup> [European Union \(Withdrawal\) Act 2018](#)

<sup>4</sup> [REMIT | Insights Solution](#)

<sup>5</sup> [CP1583 Rationalising publication of European Transparency Regulation \(ETR\) data on Elexon Systems](#)

2.4.7 is no longer required. ETR data is used to notify any changes in the availability of generation or consumption units. CP1583 recognised that data submitted under REMIT obligations already satisfies these requirements, making duplicate submissions unnecessary.

### **The modification proposal**

GC0174 (the Proposal<sup>6</sup>) was raised by the National Energy System Operator (NESO) on 11 June 2024. The initial Proposal sought to remove the obligation for the EU Transparency Availability Data currently specified in OC.2.4.7 in accordance with Schedule 6 of the Data Registration Code (DRC) for data to be sent from relevant Users to NESO via Market Operation Data Interface System (MODIS) to Elexon.

However, following the Workgroup discussions, it was changed to retain the existing text but modify it to permit Users to submit the data to Elexon either directly using REMIT or via MODIS. The Workgroup agreed to keep OC2.4.7 but update the legal text to reflect current platforms and data submission methods. Whilst REMIT obligations exist outside of the GC, the Workgroup noted that ETR and REMIT requirements overlap. Removing OC2.4.7 entirely risked losing clarity on how these obligations interact.

Therefore, to avoid duplication and simplify process, the solution was amended allowing Users to submit their data either via MODIS to NESO, then on to Elexon or directly to Elexon using REMIT. Thus, maintaining a link to the GC.

A Code Administrator Consultation (CAC) was issued on the 27 June 2025 and closed on 28 July 2025 receiving a single non-confidential response. The respondent was in support of the Proposal.

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<sup>6</sup> [GC0174 Proposal Form.pdf](#)

The Proposer considers the Proposal to have a positive impact on the Applicable Grid Code Objective (AGCO) (v)<sup>7</sup> and to have a neutral impact on all other objectives.

### **Grid Code Review Panel recommendation**

The Grid Code Review Panel met on 21 August 2025 to carry out their recommendation vote. The Panel unanimously recommended that the Proposer's solution should be implemented.

None of the Panel members considered the Proposal to have a negative impact on any of the AGCOs. The Panel's recommendations either indicated a neutral or a positive impact of the implementation of the Proposal over the Baseline.

Of the eight Panel members who contributed, seven considered the modification to have a positive impact on AGCO (i).<sup>8</sup> Two members considered the modification to have a positive impact on AGCO (iii).<sup>9</sup> For AGCO (iv)<sup>10</sup>, six members considered the modification to have a positive impact. Four Panel members agreed with the Proposer's view that the modification had a positive impact for AGCO (v).<sup>11</sup>

### **Our decision**

We have considered the issues raised by the modification proposal and in the Final Modification Report dated 03 September 2025. We have considered and taken account

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<sup>7</sup> AGCO (v): To promote efficiency in the implementation and administration of the Grid Code arrangements.

<sup>8</sup> AGCO (i): To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity.

<sup>9</sup> AGCO (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.

<sup>10</sup> AGCO (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

<sup>11</sup> AGCO (v): To promote efficiency in the implementation and administration of the Grid Code arrangements.

of the responses to the industry consultation on the modification proposal which are included in the Final Report.<sup>12</sup> We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the Applicable Code Objectives of the Grid Code<sup>13</sup>
- approving the modification is consistent with our principal objective and statutory duties<sup>14</sup>

### **Reasons for our decision**

We consider this modification proposal will better facilitate AGCO (v) and has a neutral impact on the other applicable objectives.

#### ***(v) to promote efficiency in the implementation and administration of the Grid Code arrangements***

The decision to approve GC0174 is driven by its positive impact on the AGCO, in better facilitating the achievement of objective (v). The modification removes unnecessary duplication of data submissions by allowing Users to meet OC2.4.7 obligations through either REMIT or MODIS, streamlining processes and reducing administrative burden. It also updates references to reflect Assimilated Law and current operational practices, ensuring consistency across codes and compliance clarity.

Furthermore, both the Workgroup and the Panel were unanimous in their support in approving GC0174. The Workgroup concluded that the proposal better facilitates AGCO than the baseline, noting that the modification clarifies obligations and improves efficiencies for impacted Users. The Panel were in agreement to recommend

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<sup>12</sup> Grid Code proposals, final reports and representations can be viewed on NESO's website at: [Grid Code Modifications](#)

<sup>13</sup> As set out in Standard Condition E3 of the Electricity System Operator Licence.

<sup>14</sup> The Authority's statutory duties are wider than matters which the Grid Code Panel Review must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

approval as GC0174 removes unnecessary duplication of data services aiding efficiency and provides clarity in relation to EU Transparency Availability Data obligations.

### **Decision notice**

In accordance with Standard Condition E3 of the Electricity System Operator Licence, the Authority hereby directs that Grid Code modification proposal Grid Code GC0174: 'Review of obligations to provide EU Transparency Availability Data as specified in OC2.4.7' be made.

**Shilen Shah**

**Head of Strategic Planning, Codes and Standards**

Signed on behalf of the Authority and authorised for that purpose