

Grid Code (GC) GC0173: Consistency of Technical and Compliance Requirements between GB and European Users (GC0173)

Decision: The Authority¹ directs² that the proposed modification to the Grid Code be made

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

Date of publication: 20 April 2026

Implementation date: 10 working days after the Authority decision

Background

As currently drafted, inconsistencies exist between the Grid Code Connection Conditions, European Connection Conditions, the relevant Compliance Processes, European Compliance Processes, and with Engineering Recommendation G99³; together, they set out the requirements and processes for connecting to GB's electricity networks. In addition, some of the data requirements are inappropriate for thermal storage technologies. The proposed modification aims to align the relevant Grid Code Connection Conditions and improve consistency with relevant Compliance Processes.

¹ 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) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

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

³ Engineering Recommendation G99 is an Annex 1 Distribution Code document, forming part of the Distribution Code. It sets out the requirements for the connection of generation equipment in parallel with public distribution networks on or after 27 April 2019. It can be found here; [Distribution Code Engineering Documents](#)

The modification proposal

National Grid Electricity System Operator (NG-ESO) – now the National Energy System Operator (NESO) - (the ‘Proposer’) raised Grid Code Modification Proposal GC0173:⁴ Consistency of Technical and Compliance Requirements between GB and European Users (the ‘Proposal’) on 22 May 2024.

The proposed Grid Code modification aims at ensuring alignment between the Grid Code Connection Conditions (CC) and European Connection Conditions (ECC), in addition to interactions with the Compliance Processes (CP) and European Compliance Processes (ECP). The solution seeks to clarify definitions, update the requirements relating to frequency sensitive relays, remove unnecessary data requirements for thermal storage technologies and improve formatting. The Proposer considers that the Proposal positively impacts Grid Code Objectives (i), (ii), (iii), (iv) and (v).⁵

The Workgroup held its Consultation between 20 March and 20 April 2025 and received four non-confidential responses and no confidential responses. All respondents were supportive of the proposed solution, with one respondent noting that they believe the proposal addresses the discontinuities between the CC and ECC, as well as providing positive consequential changes in the CP and ECP.

The five-member Workgroup met on 6 June 2025 to carry out its vote. The Workgroup concluded unanimously that the Original Solution better facilitated the Applicable Grid Code Objectives⁵ than the Baseline, which was documented in the Workgroup report dated 16 July 2025.

A Code Administrator Consultation followed between 30 July and 30 August 2025. Following the First Code Administrator Consultation, the Panel recommended a Second Code Administrator Consultation to address some legal text issues. This took place between 26 September and 27 October 2025, and received one non-confidential response, where no further issues were raised, and no confidential responses.

⁴ [GC0173: Consistency of Technical and Compliance Requirements between GB and European Users](#)

⁵ See Section E3.2. of the [Electricity System Operator Licence](#)

Grid Code Review Panel recommendation

The Panel met on 27 November 2025 to carry out their recommendation vote. The Panel recommended unanimously that the Proposer's solution be implemented and agreed by majority that the Applicable Code Objectives (i), (ii), (iii), (iv) and (v) would be better facilitated by the Proposal.

Our decision

We have considered the issues raised in the Modification Proposal (22 May 2024) and in the Final Modification Report (10 December 2025). We have considered and taken account of the responses to the industry consultations on the modification proposal which are included in the Final Modification Report.⁶ We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the Applicable Code Objectives (i), (ii), (iii), (iv) and (v).
- approving the modification is consistent with our principal objective and statutory duties.⁷

Reasons for our decision

We consider this modification proposal will better facilitate Applicable Code Objectives (i), (ii), (iii), (iv) and (v).

(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;

We agree with the Proposer that the Proposal positively impacts this objective, by improving the clarity of the affected Grid Code clauses and improving understanding. Aligning definitions across the Grid Code Connection Conditions, the European Connection Conditions, and the relevant Compliance Processes will make the Grid Code easier and more efficient for users to use.

⁶ [GC0173 Final Modification Report](#)

⁷ 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.

(ii) to facilitate 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 prevents nor restricts competition in the supply of generation of electricity);

We agree with the Proposer that the Proposal positively impacts this objective, as GC0173 will resolve inconsistencies and gaps in definitions and hence reduce ambiguity in the Grid Code. Ensuring consistent interpretation of technical rules is necessary to effectively facilitate competition.

(iii) subject to paragraphs E3.2(b)(i) and E3.2(b)(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;

We agree with the Proposer that the Proposal positively impacts this objective, as GC0173 will enable consistency between the Grid Code, G99 and EU Connection Codes, thus improving the governance that underpins secure system operation.

(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;

We agree with the Proposer that the Proposal positively impacts this objective. NESO is responsible for Administration of the Grid Code, and improving Grid Code clarity is a key objective. We therefore agree this modification as positive in respect of this Grid Code objective.

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

We agree with the Proposer that the Proposal positively impacts this objective. GC0173 will reduce unnecessary complexities/misinterpretations and enable efficient administration of the Grid Code by NESO.

Decision notice

In accordance with Standard Condition E3 of the Electricity System Operator Licence, the Authority hereby directs that Grid Code modification proposal GC0173: Consistency of Technical and Compliance Requirements between GB and European Users be made.

Shilen Shah

Head of Strategic Planning, Codes and Standards

Signed on behalf of the Authority and authorised for that purpose