

Conleth McAteer  
SONI Limited  
Castlereagh House  
12 Manse Road  
Belfast  
BT6 9RT

20 March 2024

Our Ref: NET/E/DH/900

Dear Conleth,

### **RE GASOA Modification for Approval**

SONI has requested that the Utility Regulator (**‘the Authority’**) approve the proposed modification relating to Generator Aggregator System Operator Agreements (**GASOAs**).

On 11 December 2023, SONI sent the Authority a request for a modification to the Grid Code relating to GASOAs. The request included the:

- Modification Consultation Report
- GASOA Consultation Paper
- Original Modification Proposal.

### **SONI Licence Obligations**

Under Condition 16 (3) of SONI’s Transmission System Operator Licence<sup>1</sup>, the licensee can propose revisions to the Grid Code, that require the Authority’s approval before they can be made:

#### “Revision of the Code

*3. Revisions to the Grid Code proposed by the Licensee and sent to the Authority pursuant to paragraph 2 shall require the Authority’s approval before they may be made.”*

---

<sup>1</sup> [2022-11-18 SONI TSO Consolidated.pdf \(uregni.gov.uk\)](https://www.uregni.gov.uk/2022-11-18-SONI-TSO-Consolidated.pdf)

## Background

The proposed modification was referenced in the supporting material to the Demand Side Unit System Operator Interface Agreement (DSUOIA) modification to the Grid Code, which the Authority approved on 8 December 2023.<sup>2</sup> This modification formalised and clarified the position of DSUOIA within the Grid Code, and it appears that the proposed GASOA modification has a similar aim.

Feedback to SONI's consultation from the Federation of Energy Response Aggregators (FERA) on the DSUOIA modification had suggested that *“a similar modification to reflect the agreements in place for Aggregated Generating Units also be codified within the Grid Code to formalise the use of Generator Aggregator System Operator Agreements.”* In the Consultation Report about the DSUOIA Modification, SONI highlighted that they had proposed this modification to address the feedback from FERA.

We note that SONI consulted upon the proposed modification from October 2023 to November 2023 and there were no responses received. However, SONI did identify two minor updates to the proposed modification. We also note that the modification was discussed at the Grid Code Review Panel on 27 September 2024 and 6 December 2023.

SONI aims to codify the definition of GASOAs by proposing this modification. SONI states in the modification proposal form that *“Generator Aggregator System Operator Agreements have been in use for several years. The agreements are already in place between the TSO and the existing Generator Aggregators. This modification is proposed to incorporate these agreements into the SONI Grid Code.”* SONI also comments that *“the purpose and intention of this modification proposal is to formalise the use of Generator Aggregator System Operator Agreements as well as clarifying their contents.”*

The main part of the proposal for modification contains three parts. The first would add additional text to the definition of Aggregated Generating Unit:

---

<sup>2</sup> [2023.12.08 DSUOIA Mod Decision.pdf \(uregni.gov.uk\)](#).

*“The Generating Units are part of an Aggregated Generating Unit of which a Generator Aggregator has entered into a Generator Aggregator System Operator Agreement with the TSO with respect to that premises.”<sup>3</sup>*

The second would add the following point to the definition of a ‘Generator Aggregator’, stating that they are a person who:

*“Is in receipt of or has signed a Generator Aggregator System Operator Agreement.”*

The third part of the proposed modification would create the following definition of Generator Aggregator System Operator Agreement:

*“The Bilateral agreement between the TSO and Generator Aggregator, which contains the detail specific to the Generating Units which forms part of Aggregated Generating Unit.”*

Additionally, a proposed modification to section OC11.10.1.1 of the Grid Code would change the abbreviated version of Generator Aggregator System Operator Agreement from ‘SOA’ to ‘GASOA’. It is proposed the same change would be made to OC11.12.1.

SONI states that *“The modification is intended to codify GASOA into the Grid Code. The modification also clarifies and improves the accuracy of existing definitions within the Grid Code related to AGUs.”*

## **The Decision**

Having reviewed these proposals for modification, and the supporting documentation, the Authority is satisfied that SONI has recommended this modification for approval in accordance with the relevant provisions set out in the Grid Code.

Article 12 of the Energy Order 2003 references the need for the Authority to protect the interests of consumers, including having regard to the need to ensure all

---

<sup>3</sup> Note this originally stated ‘premise’, but after query by the Authority on the intention of this proposed modification, SONI sent through an edited version of the proposed modification, which changed the wording to ‘premises’.

reasonable demands for electricity are met. In accepting the DSUOIA modification, we welcomed the potential benefits of these agreements in assisting Demand Side Management. We recognised at the time that GASOA agreements and Aggregated Generator Units would not then be represented in the Grid Code, and had a less formal status. We believe that this proposed modification would remove this issue, faced by a class of agreement that has been used for many years, and would bring more clarity to users of the system.

Therefore, under the provision of SONI's Transmission Licence Condition 16, Paragraph 3 we, as "The Authority", approve the proposed modifications to the Grid Code, as received on 11 December 2023.

The proposed changes shall be effective from the date of this letter. Please proceed to publish an updated version on SONI's website.

I trust this is satisfactory. Should you have any further queries please contact Jody O'Boyle.

Yours sincerely,



**Donald Henry**  
**Networks and Energy Futures Director**