

**Grid Code
Modification Recommendation Form**



Title of Recommended Proposal: Clarification of User Cost Responsibilities for Incorrect Data Submissions
MPID (EirGrid Use Only): 347

Date: 26 May 2026

Recommended at GCRP Meeting Date: 26 March 2026

Grid Code Version: 16

Grid Code Section(s) Impacted by Recommended Proposal: PC.8.4

The Reason for the Recommended Modification:

This modification clarifies the purpose and application of PC.8.4 in relation to the allocation of costs where data submitted by a User is subsequently determined to be incorrect or inaccurate. The current wording contains several ambiguities, particularly regarding the sequence of events that give rise to cost recovery.

The revised text preserves the original intent and obligation of the requirement while presenting it more clearly and precisely. This reduces the risk of misinterpretation and supports consistent application by both Users and the TSO. By improving the presentation of the requirement rather than altering its substance, the modification improves the overall quality, clarity, and usability of the Grid Code without introducing any new requirements or changing existing requirements.

History of Progression through GCRPs, Working Group and/or Consultation:

The proposal was presented to the Grid Code Review Panel (GCRP) on 26 March 2026 by Muhammad Saad Khan (EirGrid). A few concerns were raised during the discussion of the proposed modification, which were subsequently addressed by the Transmission System Operator (TSO).

Concerns raised:

1. Karl O’Keeffe (Offshore) raised a concern regarding the timing of the proposed modification in advance of the EMT Model Validation Guidelines Working Group. He requested that Modification MPID 347 be placed on hold and that discussion of the proposal be included within the remit of the working group.

2. William Carr (PSG) noted that he could understand the concern raised. He commented that tests in this context relate to OC.10 and are intended to validate requirements under connection conditions, with no specific framing around accuracy.

Concerns addressed by the TSO:

1. The EMT Model Validation Guidelines Working Group has been established to discuss EMT Model Specifications.
2. The proposed modification does not change the intent of the wording of the original clause.
3. Should a change to the clause be required because of recommendations arising from the working group, the appropriate modification procedure will apply under the governance of the Grid Code.
4. On this basis, it was agreed to proceed with issuing a recommendation to the CRU.

Further to the above discussion, a post meeting note was received from Karl O’Keeffe (Offshore), 27 April 2026, and it states:

Turning to MPID347 (clarification of User cost responsibilities for incorrect data submissions), the Offshore representative recognises that the proposal is framed as a clarification rather than a change in underlying obligation, and that PC.8.4 applies generally where submitted data is subsequently tested and found to be incorrect or inaccurate. From an offshore perspective, it is important to note that the practical cost exposure associated with re-testing or additional system studies can be materially higher than for many onshore Users, given the scale and complexity of testing across multiple domains.

While EMT modelling provides a clear illustration of this issue, the concern applies more broadly to testing and validation activities in general, particularly where standards, specifications or testing approaches continue to evolve. In such circumstances, revisions to data or models may arise from clarified requirements or technical learning rather than user error. It is therefore important that PC.8.4 continues to be applied with appropriate proportionality and judgement, consistent with its original intent. I welcome the confirmation recorded in the minutes that concerns raised by Panel members will be explicitly captured in the recommendation paper, which feels like the appropriate vehicle for this issue given the nature of the modification.

Summary Note of any Objections to the Recommended Change from GCRP Members or Consultation Responses: No objections were raised by members. Concerns raised are listed above together with the responses provided by the TSO.

No objections were raised during the meeting. Please see above concerns raised by members and subsequent responses from the TSO.

Outcome of any GCRP Meeting Actions Relating to the Recommended Modification:

The GCRP members agreed that the TSO would issue a recommendation paper to the CRU. The TSO also confirmed that concerns raised by GCRP members would be reflected in the paper, together with the TSO’s responses to those concerns.

A Table Outlining the Proposed Changes:

Definition	Red Line Version Text <i>Deleted text in strike-through red font and new text highlighted in blue font</i>	Green Line Version Text
PC.8.4	<p>In the event that any of the data items submitted are shown to be incorrect or inaccurate then the User will bear the cost of the Test in full and the data values as ascertained by the Tests will be the values used in the data. If, as a result of the changes to the data arising from the Test or Tests, the TSO have to redo or perform additional system studies then the User will also bear the cost reasonably incurred as a result of this additional work.</p> <p>If any submitted data items are found to be incorrect or inaccurate, the User shall bear the full cost of the Test(s). In such cases, the data values determined by the Test(s) shall be the values used.</p> <p>Additionally, if changes to the data arising from the Test(s) require the TSO to repeat existing system studies or perform new ones, the User shall bear the reasonable costs incurred for this additional work(s).</p>	<p>PC.8.4</p> <p>If any submitted data items are found to be incorrect or inaccurate, the User shall bear the full cost of the Test(s). In such cases, the data values determined by the Test(s) shall be the values used.</p> <p>Additionally, if changes to the data arising from the Test(s) require the TSO to redo existing system studies or perform new ones, the User shall also bear the reasonable costs incurred for this additional work.</p>