Public

Code Administrator Meeting Summary

Workgroup Meeting 14: GSR030 Offshore DC Connections

Date: 11 June 2025

Contact Details

Chair: Teri Puddefoot, teri.puddefoot@neso.energy
Proposer : Bieshoy Awad, Bieshoy.awad@neso.energy

Key areas of discussion

Introduction

The Chair welcomed the Workgroup, confirmed quoracy, gave a brief overview of the objectives for the meeting and reminded the Workgroup of their responsibilities. To include Timeline Review, Action Log Updates, Terms of Reference Discussion, Workgroup Consultation with emphasis on the importance of consultation within the workgroup to ensure all members are aligned and contributing effectively and Legal Text Review.

Objectives and Timeline

The Chair updated the Workgroup on the next Workgroups being scheduled in for the 20th of June and the one following that is the 4th of July, to ensure capture of all information prior to going to consultation.

Actions

Action 20: Workgroup members discussed the action regarding the retrospective impact on existing cables and the sufficiency of the assessment. There was confusion about the confidentiality of information, but it was clarified that relevant data is publicly available. Closed should no further feedback be received.

Assessment of Retrospectivity: The Workgroup discussed that the current assessment may not be sufficient and suggested further consultation to gather insights from those not involved in the working group. It was agreed that this may for part of a Workgroup Consultation question.

Confidentiality Concerns: Discussions around the confidentiality of information related to the survey, ultimately concluding that the available data is not confidential as it can be found online.

Action 29: Discussion regarding the sharing of presentation slides from Orsted from Work Group 5 and the willingness to share the presentation after confirming its relevance and updating it as necessary. The Chair emphasised the importance of including all discussions from the work group in the upcoming consultation and agree to wait for final confirmation before proceeding.

Action 42: Discussions raised concern regarding scope creep of GSR030. Workgroup members shared mixed opinions on whether the project was deviating from its original scope and how to address these concerns moving forward.

Panel opinions on scope: BA advised Workgroup that discussions from Panel members expressed that there was scope creep, while others had mixed views, leading to a need for further clarification. It was agreed that this would be added as an agenda item for the next Panel for a more detailed conversation and Workgroup would be updated.

Action 43: To provide feedback on details discussed in Workgroup 10. Closed

Action 45: Discussion raised on the creation and sharing of a diagram related to worst-case scenarios concerning voltage limits and reactive power. Workgroup members confirmed that while the diagram is not included in the document, additional text has been incorporated and agreed to close the discussion based on this understanding.

Action 46: Discussion took place around the processes and implications related to the STC (System Operator – Transmission Owner Code) STC and the classification of transmission assets. Workgroup members expressed various viewpoints on how these processes should be managed, particularly concerning the involvement of users and the potential impacts on their operations.

Overview of the STC Proposal: To review and comment on the draft proposal for the STC, specifically whether certain elements should be included or deleted. Question raised about the relevance of the STC in the context of the reclassification process, indicating uncertainty about its inclusion in the STC (System Operator Transmission Owner).

Importance of User Involvement: Emphasis given for the necessity of having a clear process in the STC to address concerns from the workgroup about acting unreasonably. Suggestion that both principles and detailed processes should be included in the document to ensure transparency and fairness. Discussions raised scepticism on whether the STC is the appropriate forum for such discussions, suggesting that it may feel exclusive to those whose assets could be reclassified.

Conflict of Interest Concerns: Discussions raised concerns of potential conflicts of interest, particularly regarding how restrictions on transmission assets are attributed. Should the transmission owners (TOs) be involved in the decision-making process, it could lead to unfair outcomes for other parties affected by these decisions.

Implications for Existing Assets: The discussion touched on how existing assets will be treated under the new proposals and raised the point of obligations cannot be placed on users not party to the STC, suggesting that any changes affecting users must be incorporated into a code they are part of and, that existing connections should have a different mechanism for sharing restrictions based on capacity, but this remains a complex issue.

- **Key Concerns:**
  - Unfair attribution of restrictions.
  - Need for mechanisms in place for existing assets.
  - Clarification on the code obligation this sits in.

Future Actions and Considerations: Discussions concluded with a consensus on the need to capture the differing views on where certain processes should reside, either within the STC or the CUSC (Connection and Use of System Code). Suggestion given that these viewpoints be included in the upcoming consultation to gather broader industry feedback.

The discussions highlighted the importance of clarity, fairness, and user engagement in the ongoing discussions about the STC and asset classification processes. The discussions recognised the complexity of these issues and the necessity for thorough consideration of all stakeholders involved.

The Workgroup discussed the principles and processes related to the STC (Standard Transmission Code) and the implications for users, particularly regarding asset classification and reclassification. The Workgroup express concerns about the STC being a closed forum and the lack of visibility for those affected by decisions made within it.

- **STC Principles and Process:** The discussion included the principles added to the document and concerns about including detailed processes that could lead to unnecessary debates.
- **Concerns About STC Forum:** the STC feels like a closed shop for those with reclassified assets, suggesting it may not be the right forum for these discussions.
- **Ownership and Impact:** The discussions highlight that while the classification affects generators, the assets are owned by Transmission Owners, leading to complexities in responsibility and visibility for affected parties.
- **User Participation in Codes:** emphasis given that obligations affecting users cannot be placed in the STC since users are not parties to it, suggesting that relevant discussions should occur in codes that include user participation.

- **Conflict of Interest Concerns:** concerns about potential conflicts of interest when Transmission Owners decide on attributions that affect generators and users, questioning the fairness of such arrangements.
- **Attribution of Non-Compliance:** how non-compliance is attributed to specific circuits and its implications for users, indicating that these decisions can have significant impacts on their operations

Action 48: The Workgroup members were asked to review the report, particularly the justification for the 1800 MW section, and provide feedback, on Section 3, page 12. Closed

Action 50: discussions were centred on stakeholder representation and the implications of regulatory changes, emphasising the importance of engaging with relevant industry parties to understand the potential impact of these changes.

Stakeholder Engagement: The discussion highlighted the necessity of further engagement with the Ofgem and OFTO teams to clarify their expectations regarding regulatory changes and their implications for stakeholders.
Concerns about Regulatory Changes: Workgroup Members expressed concerns that modifications to the regulatory regime might affect the financial modelling and pricing strategies of stakeholders, particularly in relation to revenue restrictions.

Action 51: Closed

Action 52: Open

<u>Terms of Reference</u>

Discussions focused on reviewing the Terms of Reference (ToR) and assessing the reliability data related to the project, and expressed that while significant progress has been made, further consultation may reveal additional points that require attention.

- **Assessment of Reliability Data:** evaluated the reliability data based on various levels and believes they have addressed the associated actions adequately.
- **Consultation and Next Steps:** consensus that while much has been accomplished, responses from the work group consultation may highlight further issues that need to be addressed before finalizing the terms of reference.

The Proposer suggested two main points for inclusion into the modification, Interconnectors and data sharing.

The Workgroup discussion delved into the complexities surrounding data sharing and interconnectors within the context of transmission circuits. Underscoring the necessity of clearly defining the role of interconnectors and the expectations placed upon them, particularly regarding their impact on transmission assessments. The narrative emphasizes that while interconnectors are not explicitly mandated to adhere to certain processes, there is an expectation for them to act reasonably and mitigate risks associated with their operations.

Discussions elucidate two significant themes related to interconnectors and data sharing:

Interconnectors' Impact: Discussions suggested the interconnectors should be treated as independent entities with specific considerations rather than assumptions made throughout the document. It points out that there is an expectation for interconnectors to trade consistently within the established frameworks, even if they are not directly obliged to do so. This is crucial for understanding how their operations might influence risk assessments and operational decisions.

Data Sharing and Risk Levels: There is a focus on the importance of sharing information regarding risk levels associated with interconnectors. The need for transparency and collaboration among parties to ensure that everyone is aware of the existing risks and the necessary precautions that should be taken. This is particularly relevant in the context of new projects and the potential adjustments that may need to be made based on historical data and assessments.

Discussion Points

Several discussion points regarding the processes and mechanisms involved in managing interconnectors:

Risk Assessment Mechanisms: It emphasizes the necessity for a robust framework for evaluating risks associated with interconnectors and the potential impacts on existing transmission circuits. This includes understanding how different probabilities of risk can influence decision-making processes.

Proximity and Cable Routing: The challenges associated with cable routing in close proximity to existing infrastructure. It highlights the need for clear guidelines on the distances that require protective measures, as well as the implications of changing those guidelines over time.

The discussion underscored the intricate relationship between interconnectors, data sharing, and risk management. It advocates for a structured approach to ensure that all parties involved are adequately informed and prepared to address the risks associated with their operations. The discussions aim to foster a collaborative environment where data sharing becomes a norm, ultimately enhancing the overall safety and efficiency of transmission networks.

The consultation process: discussions between all Workgroup members was highlighted, for the need to understand the requirements, goals, and challenges. The consultation will gather relevant information, analyse the situation, and provide expert advice and recommendations. The consultation process is aimed at offering tailored solution(s) and strategies to help achieve objectives of the modification, effectively and offer a collaborative process that ensures all concerns are addressed, and the best possible outcomes are achieved.

Legal Text

To be discussed at next meeting.

Next Steps

All to review Workgroup consultation and address actions in readiness for the next Workgroup

Actions

For the full action log, click here.

Action Number	Workgroup Raised	Owner	Action	Due by	Status
46	WG14	All	Workgroup consultation document I think as we've said previously this document is for everybody's comment on	WK 15	Open
50	WG14	BA	To email Panel to gain their views on the representation within the Workgroup to avoid issues on the day of submission.	WK15	Open
52	Click or tap here to enter text.	BA	Proposer to revise specific workgroup consultation questions and amend as discussed in the Workgroup.	WG13	Open
53	WG14	TP	Circulate the 'Cyber and Physical Security Threats' presented to JESG to the Workgroup	WK15	Open

Public

Attendees

Name	Initial	Company	Role
Teri Puddefoot	TP	NESO	Chair
Karen Stanton-Hughes	KSH	NESO	Tech Secretary
Bieshoy Awad	BA	NESO	Proposer
Stephen Bakeer	SB	NESO	NESO Representative
Andrew Urguhart	AU	SSE	Alternative Workgroup Member
Calum Mackenzie	CM	NESO	Observer
Garth Graham	GG	SSE	Workgroup Member
George Arvanitakis	GA	Xlinks	Observer
Gideon Miti	GM	Compliance Team	Observer
Lewis Johnson	LJ	BP	Workgroup Member
Nicola Barberis Negra	NN	Orsted	Workgroup Member
Roddy Wilson	RW	SSEN Transmission	Workgroup Member
Ross Wilson	RWI	BP	Observer
Usman Farooq	UF	NESO	Observer
Yuankai Bian	YB	NESO	Observer
Xiao-Ping Zhang	XZ	Birmingham AC	Workgroup Member