Public

# Code Administrator Meeting Summary

Workgroup Meeting 1 (24): GC0117 – Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements

**Date:** 24 October 2025

**Contact Details**
Chair: Claire Goult; claire.goult@neso.energy
Proposer: Garth Graham; garth.graham@sse.com

## Key areas of discussion

The aim of Workgroup 2 was to provide a brief overview of the Code Governance modification process, responsibilities and membership of Workgroup members, update on the Workgroup vote, objectives and timeline, Terms of Reference, and a presentation from NESO SMEs to provide a recap of the Proposal, Ofgem's send back, and Workgroup questions.

## Workgroup Vote

The discussion clarified that the send-back does not reopen the solution refinement but focuses on addressing specific concerns raised by Ofgem. Questions were raised about the implications of revisiting the Cost Benefit Analysis (CBA) and whether a new Workgroup vote should be conducted. The Chair noted that NESO legal advice suggested restating the previous vote rather than reopening it, with opportunities for feedback during the second CAC. The Workgroup members raised concerns regarding this, with an action taken by Ofgem to review the send-back requirements. The majority of the Workgroup was in favour of revisiting the vote.

## Objectives and Timeline

The Chair took the Workgroup members through the timeline and objectives for future Workgroup meetings and various consultations and reports. The timeline

for submitting the second Final Modification Report (FMR) to Ofgem was noted, with a target date of August 2026. The send-back process requires addressing Ofgem's concerns outlined in their decision letter, followed by a second Code Administrator Consultation (CAC) and Grid Code Review Panel (GCRP) agreement.

## GC0117 NESO Presentation, Ofgem Send-Back, Issues to Consider

The NESO representative provided a recap of GC0117, including its objectives to harmonise Power Station thresholds and the historical context of differing thresholds across regions. The Original and Alternate proposals were outlined, with the Original Proposal setting thresholds at 10 MW and removing the medium threshold, while the Alternative Proposal applies England and Wales thresholds to Scotland.

The issue of retrospectivity was addressed, clarifying that neither the Original Proposal or Alternative would apply to existing Generators unless substantial modifications were made to their plants which is a European Requirements for Generators obligation. The implications of substantial modifications under existing rules were discussed, including the potential reclassification of Power Stations and associated technical and administrative requirements. Some members argued that the CBA should include an analysis of the potential benefits of applying GC0117 retrospectively; others felt this would complicate the scope and should be addressed separately. A member raised concerns about the implications for existing Generators, particularly regarding the costs and technical requirements of transitioning to "large" classification. There was also discussion about how this transition aligns with and other reforms like CP2030 and Active Network Management (ANM) schemes. The consensus leaned toward keeping the CBA focused on the Original and Alternative proposals, with any retrospective analysis to be considered in a separate modification if needed.

The CBA conducted in 2023 was summarised, highlighting potential savings in balancing system costs, constraint costs, and demand forecasting errors under both the Original Proposal and Alternative. However, it was noted that the analysis needs to be updated to reflect current data and changes in the energy landscape. There was also a discussion on whether the CBA is to cover both the Original Proposal and the Alternate, with a consensus that this should be done. The NESO SME stressed the importance of clearly defining the scope of the new CBA to ensure it captures all relevant factors. They acknowledged that conducting a new CBA would require significant resources, so it is crucial to focus on the most impactful areas, as this affects consumers and to prevent any need for re-analysis once the CBA has been completed.

Additional impacts of the modification were discussed, including compliance processes, connections reform, CP2030, and Control Room balancing program enhancements, with a suggestion to follow up with the relevant teams and potential connection reform costs. Consequential changes to other codes, such as CUSC, SQSS, and BSC, were identified as separate and consequential modifications if the modification is approved.

There was also a discussion on the implications of removing BELLA agreements and transitioning to BEGA agreements. It was suggested that the cost of BELLA agreements should be clarified to assess whether they could remain a viable option. The limited control and visibility provided by BELLA agreements were noted as a challenge for NESO in managing the system effectively. The removal of BELLA agreements for new Power Stations was discussed as part of the harmonisation efforts, but historic BELLAs would remain.

The discussion highlighted the challenges posed by the increasing volume of embedded generation, which now constitutes a significant portion of GB generation. This has created operational difficulties due to reduced visibility and control over the system, noting that the System Operator has to balance the

system with a smaller proportion of Generation which is increasing operating costs. The Workgroup emphasised the need for a level playing field, ensuring that all Generators, regardless of location, operate under the same competitive rules.

## Terms of Reference

The Chair presented the agreed Terms of Reference (ToR). The Workgroup agreed to stick closely to the revised ToR and avoid expanding the scope beyond what was outlined in Ofgem's letter. There was a suggestion to clarify certain aspects, such as the interaction between GC0117 and CP2030, to ensure realistic assumptions are made in the CBA.

## AOB

None.

## Next Steps

- The Workgroup agreed to meet again on 11 November, with a focus on progressing the work in line with Ofgem's requirements.
- Finalise the scope of the CBA and address any outstanding questions.

## Action log

For the full action log, click here.

| Action Number | Workgroup Raised | Owner | Action | Due by | Status |
|---|---|---|---|---|---|
| 1 | WG1 (24) | CG/JR | Send out updated slides and remaining invites | WG2 (25) | Closed |
| 2 | WG1 (24) | CG | Raise concerns regarding voting expressed by members internally | WG2 (25) | Open |

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| 3 | WG1 (24) | AJ | Engage with CBA team to ensure any of the CAC responses are reflected in the CBA (raised by AC) | TBC | Open |
| 4 | WG1 (24) | AJ | Regarding consequential changes to other code, provide further information and timelines | TBC | Open |
| 5 | WG1 (24) | AJ | Research BELLA versus BEGA numbers | TBC | Open |
| 6 | WG1 (24) | PD | Ofgem to confirm if the new CBA is only to be done on the 'Original Proposal (OP)' solution (ie 10MW) or OP and Alternative | WG2 (25) | Open |
| 7 | WG1 (24) | AJ | CBA Representative to attend the Workgroup meeting to explain the process clearly | TBC | Open |
| 8 | WG1 (24) | MS (TIDE project) | Presentation on TIDE to discuss the relationship with GC0117 | WG2 (25) | Open |
| 9 | WG1 (24) | CG | Adding in to the report a simple table showing the total level of embedded generation in 2019, 2025 and forecast to be in 2030 (Suggested by GG) | TBC | Open |
| 10 | WG1 (24) | PD | Confirm whether all the additional items mentioned in the Ofgem letter need to be explicitly added to the ToR, or if they are implicitly covered | WG2 (25) | Open |

## Attendees

| Name | Initial | Company | Role |
|---|---|---|---|
| Claire Goult | CG | NESO | Chair |
| Jess Rivalland | JR | NESO | Technical Secretary |
| Alan Creighton | AC | Northern Powergrid | Workgroup Member |

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| Antony Johnson | AJ | NESO | NESO Representative |
| Amanda Rooney | AR | NESO | NESO Representative Alternate |
| Benchohra Sayah | BS | NGET | Workgroup Member |
| Chris Marsland | CM | Clarke Energy Ltd | Workgroup Member |
| Claire Hynes | CH | RWE | Workgroup Member Alternate |
| Garth Graham | GG | SSE Generation | Proposer |
| Graeme Vincent | GV | SP Energy Networks | Workgroup Member |
| Iain Nicoll | IN | Elexon | Workgroup Member Alternate |
| John Brereton | JB | Enviromena | Workgroup Member |
| John Lucas | JL | Elexon | Workgroup Member |
| Lorna Lewin | LL | Elexon | Observer |
| Madhusudhan Srinivasan | MS | SSEN Distribution | Workgroup Member |
| Paul Drew | PD | Ofgem | Authority Representative |
| Paul Youngman | PY | Drax | Workgroup Member |
| Richard Wilson | RW | UK Power Networks | Workgroup Member |
| Roddy Wilson | RW | SHE Transmission | Workgroup Member |
| Stuart Miller | SM | NESO (REMA) | Observer |
| Tim Ellingham | TE | RWE | Workgroup Member |
| Zivanayi Musanhi | ZM | UK Power Networks | Workgroup Member Alternate |