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Code Administrator Meeting

Summary

Workgroup Meeting 9: GC0168 – Submission of Electro Magnetic Transient (EMT) Models

Date: 07 November 2025

Contact Details

Chair: Kat Higby, Katharine.higby@neso.energy

Proposer: Frank Kasibante, Frank.kasibante@neso.energy

Key areas of discussion

The Chair outlined the agenda, which included a summary of Grid Code Review Panel feedback, discussion on Licence Exempt Embedded Medium Power Stations (LEEMPS), cost recovery, legal text review, potential derogations, Terms of Reference, and AOB.

The timeline for completing the Workgroup phase was discussed, with an expectation of two or more meetings to finalise activities and confirm votes.

Discussion on LEEMPS

The Workgroup discussed how obligations for providing Electromagnetic Transient (EMT) models—referred to as LEEMPS should be structured in the legal text, focusing on whether compliance dates and requirements should be stated directly in sections 5.3 and 5.4 or consolidated in PCA 9.2.

An Observer expressed concern that removing explicit compliance dates from Sections 5.3 and 5.4 could make obligations unclear, as the summary table in PCA 9.2 might not be sufficient for legal clarity.

The NESO SME clarified that the intent was to avoid duplication by consolidating requirements in PCA 9.2, but Workgroup members recommended reinstating the explicit date-related text for clarity and ease of understanding.

The Workgroup agreed that the Observer would draft suggested wording to improve clarity, and further feedback from members would be sought before finalising the legal text. **(Action 31)**

No final decision was made; the Workgroup will review both approaches to ensure obligations are clear and legally robust.

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Cost Recovery

The Workgroup debated whether to progress the technical grid code modification separately from the commercial cost recovery mechanism, with Ofgem and NESO supporting separation to avoid delays.

Concerns were raised by several Workgroup members about the risk of Users incurring significant costs for EMT models without a compensation mechanism in place, emphasising the need for alignment before implementation.

Users were encouraged to participate in developing the cost recovery case, as costs will vary by technology and situation.

There is currently no automatic bilateral cost recovery process; interim solutions may be needed until the CUSC modification is approved.

No final agreement was reached; several Users remained reluctant to remove the legal text linking technical obligations to cost recovery without written assurances or guarantees.

The Workgroup decided to take the issue away for further internal discussion and revisit it at the next workgroup meeting, with Users encouraged to participate in developing the CUSC cost recovery case. **(Action 32)**

Legal Text Review

The Workgroup debated whether to remove the paragraph (PCA 9.2.2.2) that links technical obligations to cost recovery, with several members expressing concern about retrospective costs and the need for written assurances or conditions.

NESO and Ofgem advocated for separating technical and commercial requirements, suggesting concerns be documented in voting statements and the workgroup report.

Editorial changes and improvements to other sections of the legal text were discussed, including clarifying obligations and cross-referencing requirements.

Specific technical points were raised about data availability for legacy assets and the responsibilities of users versus NESO, with suggestions to improve the guidance and legal text to reflect practical challenges.

A Workgroup member was asked to suggest preferred wording to clarify the use of "interface point" in PCA 6.7, as they noted that the term may not accurately reflect User obligations in certain network contexts. They agreed to propose alternative wording for review at the next meeting. **(Action 33)**

A Workgroup member raised that Users may lack legacy model data, as OEMs previously sent it directly to National Grid, especially for obsolete equipment. They suggested NESO should help provide data in exceptional cases where Users cannot.

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The NESO SME agreed NESO could assist in such cases, but Users are generally responsible; this should be clarified in the guidance or legal text.

The Workgroup will consider drafting an exception to cover these scenarios.

Next Steps

The Chair outlined next steps, including updating the legal text, circulating the action log, arranging at least three more workgroup meetings, and seeking early engagement with the Grid Code Panel to avoid further delays, with all members encouraged to submit comments and proposals ahead of the next session.

Actions

For the full action log, click [here](#).

Action Number	Workgroup Raised	Owner	Action	Due by	Status
31	WG9	MK	Draft and suggest revised legal text for sections 5.3 and 5.4 to clarify obligations and compliance dates and share it with the Workgroup for review.	WG10	Open
32	WG9	All	Contact RWE to join and support the CUSC cost recovery modification process, especially for those interested in participating or reviewing the draft.	WG10	Open
33	WG9	GV	Suggest preferred wording to clarify the use of "interface point" in PCA 6.7, as it was noted that the term may not accurately reflect User obligations in certain network contexts.	WG10	Open

Attendees

Name	Initial	Company	Role
Kat Higby	KH	NESO Code Administrator	Chair

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Sarah Williams	SW	NESO Code Administrator	Technical Secretary
Frank Kasibante	FK	NESO	Proposer
Akshay Prajapati	AP	Orsted Power UK Limited	Workgroup member
Arsalan Zaidi	AZ	Ofgem	Authority Representative
Benjamin Marshall	BM	SSE	Observer
Gopi Yericherla	GY	NESO	NESO SME
Graeme Vincent	GV	SP Energy Networks	Workgroup member
Isaac Gutierrez	IG	Scottish Power	Workgroup member
Jayaraman Ramachandran	JR	NESO	NESO SME
Martin Aten	MA	Uniper	Workgroup member
Mike Kay	MK	P2 Analysis Ltd	Observer
Paul Drew	PD	Ofgem	Authority Representative
Ranjan Sharma	RS	Siemens Gamesa Renewable Energy	Workgroup member
Ross Strachan	RSt	EDF Renewables	Workgroup member
Srinivas Edla	SE	SSEN Transmission	Workgroup member
Toktam Sharifan	TS	KREC	Observer
Tim Ellingham	TE	RWE	Observer