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Code Administrator Consultation Response Proforma

GSR034: Review of Loss of Power Infeed Risk for Offshore DC Converter

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to box.sqss@neso.energy by **5pm** on **19 November 2025**.

Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact box.sqss@neso.energy

Respondent details	Please enter your details	
Respondent name:	Roddy Wilson/ Sarah Clark	
Company name:	SSEN Transmission / SSE	
Email address:	Roddy.Wilson@sse.com / Sarah.Clark2@sse.com	
Phone number:	Click or tap here to enter text.	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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I wish my response to be:

(Please mark the relevant box)	<input checked="" type="checkbox"/> Non-Confidential (<i>this <u>will be shared</u> with industry and the Panel for further consideration</i>)
	<input type="checkbox"/> Confidential (<i>this will be disclosed to the Authority in full but, unless specified, <u>will not be shared</u> with the Panel or the industry for further consideration</i>)

For reference the Applicable SQSS Objectives are:

- a) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;
- b) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;
- c) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and
- d) facilitate Licensees to comply with any relevant obligations under Assimilated law.

Please express your views in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions			
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives	Mark the Objectives which you believe the proposed solution(s) better facilitates than the current baseline:	
		Original	<input checked="" type="checkbox"/> (a) <input type="checkbox"/> (b) <input type="checkbox"/> (c) <input type="checkbox"/> (d) <input type="checkbox"/> None

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	against the current baseline?	<p>On balance, we consider that the proposed modification provides a reasonable and proportionate update to the current SQSS provisions. The ability for offshore HVDC converters to utilise the increased infrequent loss-of-infeed limit offers increased flexibility in offshore network design and may avoid the need for additional infrastructure where this is not technically necessary. This is consistent with the efficient and coordinated planning and development of the transmission system, in line with Objective (a).</p> <p>With respect to system security, we acknowledge that permitting a higher infeed loss may lead to an increased number of frequency excursions. However, the analysis indicates that these impacts can be effectively managed through established ESO frequency response procurement processes. On this basis, we consider that the proposal remains compatible with maintaining appropriate levels of system security and quality of supply in accordance with Objective (b).</p> <p>We do not identify any material impacts on Objectives (c) or (d)</p>
2	Do you support the proposed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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	implementation approach?	Yes. The proposed implementation approach appears clear, proportionate and operationally deliverable. The measures required to manage the higher infeed loss are already embedded within existing ESO processes, and we do not foresee any significant barriers to implementation.
3	Do you have any other comments?	We acknowledge the need to update the SQSS to reflect the increased scale of offshore generation projects and the associated HVDC connection technologies. The proposal provides a pragmatic framework that better aligns with current and anticipated system development. While wider environmental or societal benefits may depend on project-specific circumstances and policy context, the technical case for revising the loss-of-infeed limit for offshore converters is well-presented and appears justified.