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SQSS Modification Proposal Form		
GSR035: System Access Reform: Review of the operational requirements on the Onshore Systems		Modification process & timetable
Overview: This modification is to review the operational criteria to enhance system access through the appropriate treatment of low probability low impact events and through limited time relaxation of the operational criteria under certain conditions.		1 Proposal Form 06 November 2025
		2 Workgroup Consultation 06 April 2026 – 28 April 2026
		3 Workgroup Report 15 July 2026
		4 Code Administrator Consultation 06 August 2026 – 28 August 2026
		5 Draft Final Modification Report 11 November 2026
		6 Final Modification Report 08 December 2026
		7 Implementation TBC
Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.		
This modification is expected to have a: Medium impact Transmission Owners (TOs), Transmission System Operator (NESO), Distribution Network Owners (DNOs), Directly Connected Customers (DCCs), OFTOs, Interconnectors and Generators.		
Proposer's recommendation of governance route	Standard Governance modification with assessment by a Workgroup.	
Who can I talk to about the change?	Proposer: Dozie Nnabuike Dozie.Nnabuike@neso.energy 07970004786	Code Administrator Contact: box.SQSS@neso.energy

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What is the issue?

- The current rules for planning and operating the Electricity Transmission (ET) network are too rigid, often blocking essential maintenance or upgrades even when the risk is very low. This slows down progress and can delay projects that benefit consumers. Section 5 criteria applicable to onshore systems require that all secured events are secured to the same criteria. This result in operational costs that are disproportionate to the probability and the impact of some secured events. It also restricts the outages that could be facilitated at any point in time.
- The operational criteria in Section 5 of the NETS SQSS offer limited flexibility when it comes to responding to occasions when the probability, cost, and means of meeting a certain criterion is disproportionate to the risks it prevents. This applies across GB but is more pronounced in onshore systems England and Wales where some low probability events are required to be secured all the time even if their impact is limited. This slows down progress of construction works, results in operational costs that are disproportionate to the probability and the impact of some secured events and restricts the outages that could be facilitated at any point in time.

Why change?

The current system access process is insufficient to support the scale and pace of transmission network development required to meet the UK's 2030 clean power and 2050 net zero targets. To deliver infrastructure at four times the historical rate, a strategic overhaul is needed.

This proposal enables beneficial outages—those that facilitate critical upgrades—without compromising system security.

These changes aim to:

- Improve outage planning flexibility and efficiency
- Reduce consumer costs and constraint impacts
- Maintain system resilience through smarter risk management
- The number of additional outages that could be facilitated if we allow the modification through

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- The comparative probability of the events under consideration in relation to other events (GSR008 have data and the Frequency Risk and Control Report (FRCR) team also have data)
- The limited negative consequences (anecdotal evidence from Scotland)
- The cap on risk as the same events would be secured if they have high impact (SQSS clause 5.3) or if their probability increases (SQSS clause 5.5)

The reform aligns with the Transmission Acceleration Action Plan and the wider System Access Reform programme¹, which has broad industry support and aims to modernise access planning, reduce emergency recalls, and support digital-first delivery.

What is the Proposer's solution?

The solution is to update the Security and Quality of Supply Standard (SQSS) to allow more flexible, risk-based decision-making for network outages and constraints. This will be achieved by:

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- The solution is to update the Security and Quality of Supply Standard (SQSS) to allow more flexible, risk-based decision-making for network outages and constraints. This will be achieved by:
- Delete clause 5.4 which requires that the onshore transmission system in England and Wales is secured for all double circuit faults. These events will continue to be secured if they have significant impact (as per clause 5.3) or if their probability is higher than usual (as per clause 5.5). The change provides consistent alignment with operational criteria across GB.
- In doing that, clauses 5.3 and 5.5 refer to a 1500MW threshold for the demand groups that must not be affected by such disturbance. Whereas the proposal does not recommend an increase to it, there may be benefit that the Workgroup considers such increase.
- Add clause 5.11.3 that provides for the relaxation of requirements for specific secured events under strictly limited conditions if these are identified through a robust process approved by the Authority. The process is likely to

¹ Transmission Acceleration Action Plan, 2023, <https://www.gov.uk/government/publications/electricity-networks-transmission-acceleration-action-plan>.

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form a part of the outage planning process so it will either be under the TOs Network Access Policy, in the STC, or a combination of both.

Draft legal text

Legal text changes details will be drawn up during the Workgroup process. Draft legal text is enclosed with this Proposal which can be found in **Annex 01**, showing the deletion in tracked-change format in accordance with the governance process described in Appendix J (Governance Framework). The addition of the clause 5.11.3, will need to be included in the legal text.

What is the impact of this change?

A medium impact to TOs, NESO, DNOs, OFTOs, DCCs, Interconnectors and Generators.

This change enables NESO and TOs to manage risks dynamically instead of including all the double-circuit faults covered by the standard. It creates a uniform consistent criteria between E & W in alignment with GB and the standard proposed in the SQSS, gaining consistency of interpretation. Further, NESO may be able to apply a case-by-case study, and a probabilistic risk assessment (N-2, N-1) to schedule winter outages safely². DNOs, OFTOs, DCCs, Interconnectors and Generators, are impacted through the possibility of outage overlapping with operations or need for system access³. Despite this the DCCs, DNOs may benefit from faster project delivery and reduced constraint costs.

Proposer's assessment against SQSS Objectives	
Relevant Objective	Identified impact
(a) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity	Positive Faster and more cost-effective network upgrades and maintenance.

² Idem pg. 38-48 5, OP3.

³ TAAP, 2025, Paragraphs 4.6 4.7, 6.4, 6.5

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transmission, and the operation of that system in an efficient, economic and coordinated manner;	Improved reliability and affordability for consumers. Better coordination across the industry. Joint standard assessments to manage operational risks.
(b) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;	Neutral The proposal is expected to support improved coordination and risk assessment, which may contribute to maintaining appropriate levels of system security, quality of electricity supply, and safe operation of the National Electricity Transmission System (NETS). These outcomes are consistent with the objectives of the reform but are contingent on effective implementation and stakeholder collaboration.
(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	Positive Facilitates a more open and flexible system, making it easier for new and existing companies to compete in generating and supplying electricity. Encourages more competition in electricity generation and supply, making it easier for new entrants to participate, driving innovation and potentially lowering costs for consumers.
(d) facilitate Licensees to comply with any relevant obligations under Assimilated law	Neutral

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Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories	
Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Positive The modification will improve safety and reliability by allowing essential works and upgrades to be planned and delivered more efficiently, while still maintaining strict assessments and agreed mitigations. This ensures the system remains secure and resilient, reduces unnecessary delays, and supports a reliable electricity supply for consumers. Any increase in operational risk is carefully managed through joint assessment processes.
Lower bills than would otherwise be the case	Positive The modification will help lower consumer bills by enabling essential upgrades and maintenance to be delivered more efficiently and with fewer delays. This reduces unnecessary constraint costs and project overruns, leading to a more cost-effective electricity system. Savings from improved planning and flexibility are ultimately passed on to consumers through lower network charges.
Benefits for society as a whole	Positive The modification will benefit society by supporting a faster transition to a cleaner, more reliable, and cost-effective electricity system. It enables timely delivery of essential upgrades and new connections, helping to meet climate goals, boost economic growth, and ensure a secure energy supply for everyone. Improved planning and flexibility also reduce disruption and costs, delivering broad social and environmental benefits.

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Reduced environmental damage	Positive The modification will help reduce environmental damage by enabling faster and more efficient delivery of network upgrades that support renewable energy connections and reduce reliance on fossil fuels. Improved planning and flexibility also minimise unnecessary delays and resource use, lowering the overall environmental footprint of electricity transmission projects.
Improved quality of service	Positive The modification will improve quality of service by enabling faster and more reliable delivery of network upgrades and maintenance. This reduces the likelihood of unplanned outages, ensures a more stable electricity supply, and allows consumers to benefit from a higher standard of service. Enhanced planning and flexibility also mean issues can be addressed more proactively, further supporting consistent and dependable service.

When will this change take place?

Implementation date

Target date: Q4 2026

Date decision required by

TBC

Implementation approach

The systems and processes already exist but may require revision to enable the coordinated, transparent application of the updated security standard, within STC. Implementation will need to be co-ordinated and communicated with all affected parties.

Proposer's justification for governance route

Standard Governance modification with assessment by a Workgroup to enable the Workgroup to check their rationale for the modification to risks mitigations.

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Interactions

☒ Grid Code ☐ BSC ☒ STC ☐ CUSC
☐ European ☐ Other ☐ Other
 Network Codes modifications

This proposal is part of a broader programme of work under System Access Reform and is expected to interact with other code modifications. Concurrent changes to the STC and Grid Code are being considered to ensure alignment across the industry’s technical and governance frameworks. These interactions are being actively scoped and coordinated to support a consistent and efficient implementation pathway, with warm-up presentations and stakeholder engagement already underway across all relevant Panels.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DCC	Directly Connected Customers
DNO	Distribution Network Owners
ET	Electricity Transmission
FRCR	Frequency Risk and Control Report
NESO	National Energy System Operator
NETS	National Electricity Transmission System
OFTO	Offshore Transmission Owners
SQSS	Security and Quality of Supply Standards
STC	System Operator Transmission Owner Code

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TO	Transmission Owners
TSO	Transmission System Operator (NESO)

Annexes

Annex	Information
Annex 01	GSR035 Draft Legal Text

Reference material

- [Transmission Acceleration Action Plan, 2025](#)
- [System Access Reform | National Energy System Operator Website](#)
- [Electricity Networks Commissioner Companion Report, 2025](#)
- [Clean Power 2030 Action Plan – GOV.UK](#)