

Public

## 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](mailto: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](mailto:box.sqss@neso.energy)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Andrew Urquhart	
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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" 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 type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

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(Please mark the relevant box)

☒ **Non-Confidential** (*this will be shared with industry and the Panel for further consideration*)

☐ **Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration*)

### 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)	Mark the Objectives which you believe the proposed solution(s) better facilitates than the current baseline:

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	against the Applicable Objectives against the current baseline?	Original	<input checked="" type="checkbox"/> (a) <input type="checkbox"/> (b) <input checked="" type="checkbox"/> (c) <input type="checkbox"/> (d) <input type="checkbox"/> None
		<p>A – The proposed change will facilitate better optimisation of the offshore designs by allowing developers to procure larger HVDC links for their sites. This will allow more clean energy to flow onto the transmission network and support GBs Clean Power 2030 targets on the way to Net Zero.</p> <p>C – Developers will be able to procure larger HVDC links for their sites, better achieving benefits of scale, which in turn will feed into their bids for subsequent auctions and energy prices overall.</p>	
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
		Click or tap here to enter text.	
3	Do you have any other comments?	<p>When preparing the final report for submission to Ofgem, consider the following to ensure the Authority has the most up-to-date information for its decision:</p> <ol style="list-style-type: none"> <li><b>Include details on the referenced converter reliability review</b> to support the proposal.</li> <li><b>Clarify the benefits assessment.</b> It currently suggests that the benefits of GSR034 are equivalent to those of the HND, which is not the case. GSR034 will enable more generation capacity to connect to the GB system using the same number of connections and allow more efficient network design. However, the</li> </ol>	

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		<p>HND will still deliver its stated benefits with or without GSR034.</p> <p>3. <b>Conservatism.</b> It is worth noting that the benefits assessment assumes offshore wind benefiting from the modification would utilise the full 1,800 MW limit. However, current symmetrical monopole technology, used by most large offshore wind farms, is limited to 1,500 MW. Since the frequency cost figures are based on the 1,800 MW value, the results are conservative in the near term.</p> <p>4. <b>Review the argument referencing nuclear units.</b> It appears to imply there is no current infeed loss risk of 1800 MW. In reality, many systems operate up to the infrequent infeed limit, including substations and AC circuits, and the network is currently secured up to 1800 MW. This point requires clarification.</p>
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