Public

# Meeting Summary

## Grid Code Development Forum – 3rd December 2025

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| **Date:** | 03/12/2025 | **Location:** | MS Teams |
| **Start:** | 09:00 | **End:** | 11:00 |

## Participants

| Attendee | Company | Attendee | Company |
|---|---|---|---|
| Claire Newton | NESO (Chair) | Steve Baker | NESO |
| Matthew Dixon | NESO (Tech Sec) | Thomas Goss | NESO |
| Lizzie Timmins | NESO (Code Administrator) | Victor Mtembo | NESO |
| Vicky Allen | NESO (Presenter) | Dovile Kvedyte-Corrigan | Ofgem |
| Tanmay Kadam | NESO (Presenter) | Garry Cotter | Orsted |
| Ben Young | NESO (Presenter) | Nicola Barberis Negra | Orsted |
| Keeran Balasubramaniam | NESO (Presenter) | Ruth Kemsley | Our Footprints |
| Stephen Sommerville | Aurora Power Consulting | Mike Kay | P2 Analysis |
| Evan Stuber | CSE Storage | Andrzej Adamczyk | PSC Consulting |
| Paul Youngman | Drax | Devansh Gautam | PSC Consulting |
| John Turner | EDF | Kahraman Yumak | PSC Consulting |
| Selina Paxton | EDF | Andrew Allan | RWE |
| Chris Smith | Natural Power | Tim Ellingham | RWE |
| Amanda Rooney | NESO | Isaac Gutierrez | Scottish Power |

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| Antony Johnson | NESO | Stuart Kerr | Scottish Power |
| Frank Kasibante | NESO | Sigrid Bolik | Siemens |
| Graham Lear | NESO | Jennifer Geraghty | SSE |
| Jamie Morgan-Wormald | NESO | Mohammad Jafarian | SSE |
| Mohamed Fawzy | NESO | Salim Temtem | SSE |
| Nnaemeka Anyiam | NESO | Ankit Jotwani | Tesla |
| Ola Atef | NESO | Gorby George | TNEI |
| Pritesh Patel | NESO | Sean Gauton | Uniper |

## Agenda and slides

A link to the Agenda and Presentations from the December GCDF can be found here.

## GCDF

***Please note:*** These notes are produced as an accompaniment to the forum recording and slide pack presented and provide highlights only of discussion themes and possible next steps.

### Meeting Opening – Claire Newton (GCDF Chair) & Matthew Dixon (GCDF Tech Sec), NESO

The meeting was opened, with an overview of the agenda items that will be covered.

### Presentation: Code Administrator Update – Lizzie Timmins

The Grid Code Administrator representative provided an update on new modifications, decisions, implementations, and consultations.

1. GC0184: Reactive Power requirements for PPMs when Operating below Maximum Active Power – Presented at November Grid Code Review Panel (GCRP). Panel did not agree that a clearly defined defect exists. The Proposer has taken this away to consider.
2. GC0179: Removal of Balancing Code No.4 from the Grid Code – Represented to GCRP and will go to consultation in January.
3. GC0183: Generator and Interconnector Availability During a Severe Space Weather Event – The Authority approved this modification on 20 November 2025, and it will subsequently be implemented into the Grid Code on 04 December 2025.

4. GC0174: Review of obligations to provide EU Transparency Availability Data as specified in OC2.4.7 - The Authority approved this modification on 28 November 2025, and it will subsequently be implemented into the Grid Code on 12 December 2025.
5. GC0176: Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code – Code Administration Consultation opens on 03 December 2025 and closes on 12 January 2026.
6. GC0103: The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Code – Consultation opens on 03 December and closes 12 January 2026.

## Presentation: Transition from Mandatory Frequency Response to Dynamic Regulation – Vicky Allen

The presenter provided an overview of the work to transition from Mandatory Frequency Response (MFR) to Dynamic Regulation (DR). The following main points were discussed:

- Ofgem have placed a derogation on MFR. NESO must reform or replace it by end of 2029.
- NESO will replace MFR with DR, allowing easier entry to the Balancing Mechanism (BM) and resulting in significant consumer savings of approx. £15m pa.
- Grid Code changes raised in 2026 will allow DR to operate as an alternative to MFR.
- There will be a transition period where MFR and DR run simultaneously.
- Grid Code changes are anticipated for 2028 to remove MFR from the Grid Code.
- There will also be some changes to CUSC to support this work.
- A request was made for MFR providers to engage to aid the process of transition by contacting vicky.allen@neso.energy or laura.burdis@neso.energy.

Discussion themes / Feedback

An attendee asked for clarification around the derogation including the legal background. The presenter advised that MFR does not meet certain requirements under Assimilated Law and so there is a derogation for its use in place whilst the work continues to move away from it.

An attendee asked for confirmation that there was not an intention to remove the obligation for a mandatory frequency response service. The presenter confirmed this, making it clear that DR would become the mandatory service for providing mandatory frequency response.

An attendee asked what this meant for testing, stating that the requirements for MFR and DR are distinct as it stands with DR being a commercial service only. They went on to ask whether there would be retrospective requirements to provide DR. The presenter confirmed that there would be a requirement for everyone to transition to providing DR but clarified that there shouldn't be any issues as the requirements under DR are a relaxation of requirements compared to FMR.

An attendee asked whether the savings from transitioning to DR represented a material difference relative to the overall budget and where the figures had come from. The presenter confirmed that this would be approximately a third of the costs of frequency response but would need to take away the question on where the figures came from.

An attendee asked for confirmation of what MFR is and whether it was a service that came before Limited Frequency Sensitive Mode (LFSM) and Frequency Sensitivity Mode (FSM). The presenter confirmed that MFR was a legacy service for providing frequency response. Another attendee explained that there are two frequency response services, LFSM and FSM: All plant must be available in LFSM which is an automatic response when the frequency exceeds 50.4Hz, while FSM utilises full governor action and is selected for a small subset of plant which have a target frequency to maintain. Plant's capability when providing FSM is tested and this is entered into an MFR contract which acts as the current mechanism for how Parties get paid for supplying frequency response services when selected to FSM. This work does not change the requirements for FSM, just the contractual arrangements.

An attendee asked whether Combined Cyclic Gas Turbines (CCGTs) should be able to provide the new DR service which is currently dominated by battery energy storage systems (BESSs). The presenter confirmed that DR would be set up to allow providers of all types to participate and noted that some changes had already been made to accommodate CCGTs.

An attendee asked whether the changes would require retesting by generator compliance. Another asked what this might mean for further modelling and simulation requirements. Another attendee advised that there should not be a requirement to retest as this change is to the contractual mechanism for providing frequency response and not a change to the frequency response requirements themselves. The presenter agreed to take this away to confirm.

An attendee asked for clarification of how the current DR mechanism would change. The presenter advised that currently DR was a day ahead auction, but this would change to an instructible real time mechanism which would then replace FMR. During the transition period both the real time and day ahead mechanisms for DR would be utilised.

An attendee opined that this was a welcome change if it was a proposal to improve process without changing technical requirements.

## Presentation: Grid Code Compliance Simulations Checklists for Power Park Modules – Tanmay Kadam

The presenter outlined their work to produce checklists aimed at improving the User experience when submitting Grid Code Compliance Simulation Studies:

- The checklists will outline the simulation cases required, acceptance criteria and shall also reference relevant Grid Code clauses to improve clarity and consistency in the compliance process.
- These checklists will exist within the existing Guidance Note documents.
- Initially three checklists are being proposed to cover Grid Code requirements for Power Park Modules (PPMs) focusing on:
    1. Voltage Control
    2. Frequency Response
    3. Fault Ride Through
- A workshop will be arranged to consult with interested parties and refine the proposed checklists. Contact tanmay.kadam@neso.energy.

Discussion themes / Feedback

An attendee asked whether the proposal was introducing new Guidance Notes, suggesting that this should be a Grid Code modification instead. The proposer made it clear that there was no change to requirements being proposed. They advised that existing Guidance Notes were under review and that the checklists would be added into these existing Guidance Notes to create more clarity and consistency for Users.

Another attendee was supportive of this approach to improve clarity on what was being required and suggested that the work should be extended to ensure the Guidance Notes were fully aligned with Grid Code requirements. The Chair made it clear that any the Grid Code modification route should be followed if any contradictions were identified requiring formal code changes. Another attendee echoed that major clarifications via checklists would likely mean a Grid Code modification was needed but made it clear that they were in favour of the checklist proposal generally.

The presenter was asked whether this work would be completed in time to support imminent applications through the reformed connections process, noting that there would be many upcoming applications that would benefit from this. The presenter made clear that the checklists had been made, and the workshop was to refine these further.

A question was asked about whether the checklists would cover sub-synchronous oscillation simulations and whether they should be Root Mean Square (RMS) or Electro Magnetic Transient (EMT) simulations. The presenter made it clear that the purpose was to focus on Grid Code compliance simulations as per the three areas discussed already, but that RMS and EMT models could both be used for this.

The presenter agreed that the workshop could be used to discuss additions to checklists around acceptable responses from Users.

## Presentation: NESO Control Room Expectations in the Event of Electronic Communication Failure (EDT & EDL) – Ben Young / Keeran Balasubramaniam

The presenter advised that this topic was being discussed due to recent events where there have been EDL and EDT failures and to make it clear for industry how the Electricity Network Control Centre (ENCC) responds to these. The following main points were highlighted:

- When no commercial data for Physical Notifications (PNs) and Bid-Offer Data is submitted by 11:00 for the next operational day then previous data will be used.
- Physical Notifications (PNs) and Bid-Offer Data submitted via EDT can be updated at any time until Gate Closure.
- Dynamic Data can be submitted via EDL at any time.
- EDT is the responsibility of the participant while EDL is a NESO responsibility.
- Following an EDT failure participants should follow last submitted PN and last submitted Bid and Offer data applies to instructions.
- Following an EDL failure NESO will issue instructions, and participants can revise Dynamic Data, via telephone.
- Due to the increase in number of smaller BMUs possibly necessitating a large volume of instructions to be issued the use of Emergency Instructions and bulk Emergency Instructions can be used that can request a participant to maintain a target output until further notice.

Discussion themes / Feedback

An attendee wanted to understand how bulk Emergency Instructions would be sent. The presenter made it clear that bulk Emergency Instructions would be sent via telephone.

An attendee asked whether there were any situations where a participant would not be aware of EDT having a fault. The presenter advised that messages sent via EDT are acknowledged and so if no acknowledgement is received then this should signal an issue.

## AOB

NESO is launching an expert group to lead on the topic of large demand technical requirements with a virtual meeting to be held on 27 January 2026 kicking this off. If you are interested in joining the group, please contact box.techcodes@neso.energy.

Panel representatives outlined their role and encouraged participants to get in touch to discuss any code related issues they may have.

An attendee asked about the best way to raise code modifications when an issue is found. A short discussion followed, and the Code Administrator offered to provide an overview of the process at the next GCDF.

An attendee asked about the progress of Energy Code Reform. Several attendees showed support for requesting Ofgem attend a GCDF meeting to provide an update.

Attendees were reminded that the GCDF can be used by any industry party to present potential Grid Code changes and future agenda items are welcomed.

The Chair thanked the attendees and presenters for their contributions and closed the meeting.

**The next GCDF will be held on the 07 January 2026 with 24 December 2025 being the deadline for agenda items and presentations.**