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# Code Administrator Meeting Summary

## Workgroup Meeting 2: Enhance the Effectiveness of System Incidents Reporting

**Date: 16 December 2025**

### Contact Details

Chair: Lizzie Timmins, [Lizzie.Timmins@neso.energy](mailto:Lizzie.Timmins@neso.energy)

Proposer: Guy Nicholson, [guy.nicholson@statkraft.com](mailto:guy.nicholson@statkraft.com)

### Key areas of discussion

#### Actions Update

The Chair led the Workgroup through a review of the action log with the below updates noted.

Actions 1, 2, 3, 5, 6 and 8 were closed.

Action 4 remained open with the Workgroup member noting that initial feedback from the STC Panel indicated concerns about the steep increase in reporting frequency and data sampling, but noted that empirical evidence was still being gathered, with a cross-TO meeting planned for early January 2026 to further assess the impact.

Action 7 remained open with NESO looking into this in more detail, some ballpark figures have been noted, but the Workgroup agreed to keep the action open for further review and updates.

#### Cost benefit for GC0181 proposal

The Proposer presented a cost benefit analysis comparing the costs of more frequent reporting to the potential benefits of preventing a blackout, with the Workgroup debating the assumptions, costs, and broader implications for system resilience and consumer benefit.

The Proposer outlined his approach to evaluating the cost of increasing reporting frequency, using the Iberian blackout as a reference point for potential economic impact, and estimating the cost of additional reporting staff against the benefit of blackout prevention. One Workgroup member challenged the Proposers cost estimates, suggesting that the actual increase in workload and cost would be minimal since the data is already being collected, and the main change would be in the frequency of report publication rather than data processing. One Workgroup member suggested that the cost of increased reporting should also be compared to the annual expenditure on frequency response and inertia services, which is substantial, and highlighted the value of improved data transparency for system security and stakeholder confidence. The

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Chair reminded the Workgroup that any cost benefit analysis should include potential costs to parties beyond NESO, one workgroup member emphasised the need to avoid double-counting costs for data already being gathered by monopoly parties, referencing Energy Data Task Force guidance. The Proposer estimated the cost of a GB blackout and compared it to the cost of increased reporting, concluding that even infrequent prevention of a blackout would justify the additional expense. One Workgroup member responded to Proposer's analysis, suggesting the actual cost of increasing reporting frequency is likely lower than estimated, as the data collation workload does not multiply with more frequent reporting. The Workgroup member agreed the benefit far outweighs the cost. The Chair reminded the workgroup that their Terms of Reference require them to consider costs not just for NESO but also for other parties, and that these broader impacts should be included in the cost-benefit analysis. One Workgroup member suggested comparing the modification cost to the annual spend on frequency response and inertia services, noting that both cost-benefit analyses justify the proposal. One Workgroup member suggested that the modification could help parties fulfil their license obligations to publish data, potentially providing a benefit rather than a cost.

## Worldwide Reporting Practices

NESO presented findings on worldwide reporting practices.

NESO shared that in Europe, Australia, New Zealand, Japan, and North America typically require incident reporting within 30 calendar days or 20 business days and found no examples of any country currently reporting within one week as proposed. The Workgroup raised questions about the alignment of UK sampling rates with European requirements, specifically the move from one second to 0.5 seconds, and the need for dynamic alignment under the UK-EU agreement, NESO agreed to investigate further. One Workgroup member proposed that instead of focusing solely on post-incident reporting, the Workgroup consider continuous publication of regional frequency data at high resolution, which could simplify processes and provide greater value to stakeholders.

## NESO Data triage process

NESO presented a slide on the NESO Data triage process in response to a request by Workgroup members during meeting 1.

The Workgroup discussed the complexities of data ownership, the triage process for sharing PMU data, and the challenges in publishing high-resolution data, the Workgroup questioned current practices and advocating for greater openness and alignment with

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best practice obligations. NESO explained that while data is presumed open, NESO must conduct a triage process to determine if PMU data can be shared, considering confidentiality and potential system vulnerabilities, and requiring permission from data owners (Transmission Owners). The Proposer and a Workgroup member highlighted that since PMU data is funded by consumers and falls under best practice obligations, Transmission Owners should be publishing it, and the Workgroup should focus on ensuring compliance with these obligations rather than restricting publication due to security concerns. NESO clarified that it receives limited PMU data, much of which is not yet operational or of sufficient quality for publication, and that the Transmission Operators are responsible for the original data, with NESO producing reports based on their analysis. The Workgroup discussed the status and future rollout of PMU installations, the feasibility of meeting the reporting requirements being proposed, and the importance of regional data coverage. NESO clarified that while some PMU data is being received, it is still in the testing phase and not operational, with full rollout expected to begin after Q1 2026. One Workgroup member emphasised the need for regional diversity in PMU data to ensure meaningful analysis, suggesting alignment with existing regional boundaries used in system operability frameworks, and the Proposer supported flexibility in the number of regions as more PMUs come online. One Workgroup member noted that the expected timeline for PMU rollout aligns with the requested implementation of GC0181 and requested confirmation of when sufficient PMUs would be operational to meet the reporting requirements.

## **NESO estimate of resource cost vs benefit**

NESO presented its view on the costs and benefits of moving to weekly reporting, highlighting the increased workload, requirement for process changes, significant expansion of data storage capability, while also potentially resulting in empty reports during weeks with few or no events.

Several Workgroup members questioned the magnitude of the cost increase, arguing that much of the data processing is already being done and that the main change is in the frequency of publication, not the underlying analysis and reiterated that publishing data leads to greater system efficiency, consumer benefit, and innovation, referencing the Energy Data Task Force's findings and Ofgem's call for improved data transparency.

The Proposer clarified that the proposal does not mandate a specific report format and welcomed innovative approaches, such as searchable databases, to make the data more accessible and useful.

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### NESO Proposal

NESO presented an alternative to the Proposers' proposed legal text, aiming to reconcile the Workgroup's objectives with what is technically and operationally feasible, and invited feedback from the Workgroup and the Proposer on key points such as the number of regions, reporting frequency, and data resolution.

The Workgroup discussion focused on achievable solutions, futureproofing, and the balance between ambition and practicality. Several Workgroup members suggested wording to allow for the addition of more regions as PMU data becomes available and to align data resolution requirements with existing obligations, ensuring the modification remains relevant as technology and practices evolve. NESO clarified that sharing individual PMU measurements poses challenges, but publishing aggregated or representative frequency data at the required resolution is feasible, and that the main obstacles are process changes and alignment with international standards.

### Next Steps

Further investigation into data publication by Transmission Operators, refinement of the Legal text, and confirmation of PMU rollout timelines, with the aim of reaching consensus or identifying the need for alternative proposals at the next Workgroup meeting.

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### Actions

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

Action	Workgroup	Owner	Action	Status	Date due by
Number	Raised				
01	WG1	JSC	Share the slides presented at Workgroup 1 with Workgroup members	Closed	28/11/2025
02	WG1	FK and JSC	Investigate reporting practices in other countries (Europe, US, etc.).	Closed	28/11/2025
03	WG1	FK and AU	Review STC sections and Energy Data Task Force requirements for data sharing.	Closed	28/11/2025
04	WG1	GW	Assess cost and workload implications for Transmission Owners (TOs) providing additional data.	Open	28/11/2025

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05	WG1	FK and JSC	Check NESO data triage process against Energy Data Taskforce guidelines.	Closed	28/11/2025
06	WG1	FK and GN	FK & JSC to provide ballpark estimate resource costs for weekly vs. monthly reporting and consider the Iberian blackout impact. GN to draft and share a benefits case	Closed	28/11/2025
07	WG1	MB	Suggest thresholds for publishing larger incidents weekly and smaller ones monthly; NESO to consider if this mitigates workload concerns.	Open	28/11/2025
08	WG1	FK	Clarify what improvements are possible now, what would require more time, and how much better future data could be.	Closed	28/11/2025
09	WG2	MD	Provide sources or a public version of the NESO data classification guidelines.	New	WG3
10	WG2	GW	Investigate whether TO data is published and where it can be accessed.	New	WG3
11	WG2	AL	Prepare a short presentation on phase jumps.	New	WG3
12	WG2	JR & LT	Review the GC0181 defect description to determine if phase jump data can be included.	New	WG3
13	WG2	JSC	Confirm the timing for when 73 PMUs (or at least 5) will be operational and consider regional coverage.	New	WG3

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14	WG2	FK	Propose amended draft Legal text for the solution.	New	WG3
15	WG2	FK & JSC	Confirm GB alignment with the European standard of 0.5 seconds for frequency recording.	New	WG3

## Attendees

Name	Initial	Company	Role
Lizzie Timmins	LT	Code Administrator	Chair
Andrew Hemus	AH	Code Administrator	Technical Secretary
Guy Nicholson	GN	Statkraft	Proposer
Andrew Larkin	AL	Sygensys	Observer
Andrew Urquhart	AU	SSE	Workgroup Member
Alice Siri	AS	Ofgem	Authority Representative
Frank Kasibante	FK	NESO	Workgroup Member
Garth Graham	GG	SSE	Alternate
Gareth Williams	GW	On behalf of STC Panel	Workgroup Member
Jesus Sanchez Cortez	JSC	NESO	NESO SME
Mathew Chandy	MC	EDF Energy	Workgroup Member
Matthew Dixon	MD	NESO	Alternate
Mili Gupta	MG	NESO	NESO SME
Tim Ellingham	TE	RWE	Workgroup Member