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Code Administrator Meeting Summary

Workgroup Meeting 3: GC0117 – Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements

Date: 02 December 2025

Contact Details
Chair: Claire Goult; claire.goult@neso.energy
Proposer: Garth Graham; garth.graham@sse.com

Key areas of discussion

The aim of Workgroup 2 was to review the timeline, discuss the CBA approach, provide an update on embedded generation levels, and go through the action log.

Objectives and Timeline

The Chair presented the timeline with the next Workgroup scheduled for 21 January 2026. This meeting will be used to finalise the CBA scope and ensure all inputs have been captured.

Forecast Embedded Generation Levels

The NESO SME provided an update on forecast embedded generation levels.
The data included Connections per year from the TEC (Transmission Entry Capacity) register, the Embedded Capacity Register and Connections queue. The cumulative number of Connections over time was highlighted, as well as the cumulative capacity of Embedded Generation. It was presented in two formats, with graphs showing trends and figures, and data tables for clarity. Several questions were raised during the presentation, with one Workgroup member requesting the raw data behind the figures. An action was taken to provide this to the Workgroup members. A Workgroup member asked about the meaning of columns labelled "tech plus 100 megawatts" and "50 megawatts." The SME clarified that these columns referred to assets of specific sizes (e.g., a Plant with TEC of 100 MW or more) in the connections queue. The Workgroup member also asked why the forecast only considered known Generators (those already in the connections queue) and did not include forecasts for future Generators. The SME explained that the data included connections that are in the Transmission Entry Capacity (TEC) and Embedded Capacity Register (ECR) only, though recognised that including forecasted connections would be valuable. The SME highlighted that the data

showed a drop-off in connections by 2038-2039, as this is the extent of the data captured in the TEC and ECR. The importance of considering future forecasts was noted, as this could provide a more comprehensive view of embedded generation levels. An action was taken to investigate the possibility of including forecasts for future generation beyond the known connections.

CBA Approach

The Ofgem send-back letter was discussed. It outlined the reasons why Ofgem sent back the GC0117 modification Proposal and the key requirements from the Workgroup. With Ofgem emphasising the need for a more detailed cost sensitivity analysis in the CBA, ensuring it aligns with broader industry objectives and does not create unintended consequences or inefficiencies. Ofgem highlighted the need to assess the interaction of GC0117 with other ongoing industry developments, including Connections Reform, Clean Power 30, DSO and NESO functions, as well as the Review of Electricity Market Arrangements (REMA).

The NESO Representative and SME discussed the CBA approach and that the CBA will repeat the 2023 analysis with updated data (up to March 2025). This will then be compared to the results from 2023. The CBA will also include sensitivities in an addendum such as current and future BM (Balancing Mechanism) exemptions, regional demand forecast errors, comments raised in the original GC0117 Code Administrator Consultation, Restoration and specific workgroup members CBA comments.

There was a detailed discussion on the interaction between GC0117 and other industry developments, such as REMA and Active Network Management ANM) schemes. It was discussed that ANM schemes are generally BM exempt. ANM schemes regulate generation behind constraints, but they do so without considering cost (unlike the BM, which operates on a cost basis and availability basis). A Workgroup member queried whether all ANM schemes and technical limits are BM exempt or if this is just an assumption. The NESO SME clarified that that Generators in ANM schemes are not in the BM, highlighting that if NESO instructed an Embedded BM plant the ANM would automatically compensate for the Non-BM Plant, such that if the BM plant was increased the ANM Controlled plant would automatically be regulated down, however it was confirmed that the ANM plant would not be regulated down in cost order. However, there is ongoing work to explore whether technical limits and constraints can coexist with GC0117. It was emphasised that a solution is needed to ensure that ANM schemes and

BM participation can coexist effectively. Another Workgroup member raised a concern that if larger assets (e.g., those above 10 MW) are removed from ANM schemes to participate in the BM, it could lead to over-curtailment of smaller assets (e.g., those below 10 MW) still in ANM schemes. The importance of finding an enduring solution that considers all assets in ANM schemes, not just those above 10 MW, was stressed. The impact of ANM schemes on the CBA was highlighted which will include sensitivities related to current and future BM exemptions, including ANM schemes.

The Workgroup also highlighted the need for consistent standards across DNOs and the implications of GC0117 on data sharing and operational processes.

A spreadsheet has been created for members to submit their queries and suggestions for additional sensitivities to include in the CBA, with the deadline for input on 09 January 2026. NESO in coordination with Stakeholders and Ofgem will consider what sensitivities can reasonably be considered in the CBA. The CBA will not begin until all inputs are finalised and reviewed. It was emphasised that once the CBA starts, the scope will be locked, meaning no further changes or additions will be accepted. The CBA is expected to take several months to complete due to its complexity and resource-intensive nature. Some members expressed concerns that the deadline might not provide enough time to fully digest the material and provide input. The Chair suggested that members struggling to meet the deadline could request offline meetings for additional support. The Chair noted that Ofgem will review the spreadsheet to confirm that all necessary aspects of their feedback have been addressed.

Actions review

The Chair closed actions 11, 12, 13, 14, and 16.

Next Steps

- The Chair encouraged Workgroup members to complete the spreadsheet by 09 January 2026. Once all inputs are collected NESO will review the inputs and determine which sensitivities can reasonably be included in the CBA.
- The list of sensitivities will be shared with the Workgroup for final agreement.
- Ofgem will confirm that the finalised scope meets their requirements.
- The next Workgroup meeting is scheduled for 21 January. This meeting will review the progress made on the spreadsheet and finalise the scope of the CBA.

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Action log

For the full action log, click here.

Action Number	Workgroup Raised	Owner	Action	Due by	Status
5	WG1 (24)	AJ	Research BELLA versus BEGA numbers. Chair has reached out to internal teams.	TBC	Open
9	WG1 (24)	CG	Adding into the report a simple table showing the total level of embedded generation in 2019, 2025 and forecast to be in 2030. This will be added to the second CAC.	Ongoing	Open
11	WG2 (25)	AJ	Investigate if there are any comments made on the original CBA in the CAC responses	WG3(26)	Closed
12	WG2 (25)	CG/SK	Circulate previous CBA comments (Annex sent by email)	WG3(26)	Closed
13	WG2 (25)	MT	Forecast Embedded Generation Levels data –Figure 6 to be provided as a table on the CG0117 data thresholds for 10 MW and 100 MW	WG3(26)	Closed
14	WG2 (25)	PY/IN	Investigate whether a market facilitator should be present in these discussions	WG3(26)	Closed
15	WG2 (25)	JB/CG	To email concerns regarding connection to Chair to circulate with connection colleagues	TBC	Open
16	WG2 (25)	AJ	Set out a table breaking down Ofgem send back letter and how these will be addressed – clear direction (BS request)	WG3(26)	Closed

17	WG2 (25)	AJ	Ensure any consequential code changes are identified as follow-on work if GC0117 is approved, but not included in the current mod	Ongoing	Closed
18	WG2 (25)	AJ/SK	Consider whether to include regional demand forecast error analysis in the CBA	Ongoing	Open
19	WG2 (25)	MT	Advise that the connection data analysis be refreshed after the connections reform queue is updated, due to expected significant changes	WG3(26)	Open
20	WG2 (25)	All	Update generator CapEx and OpEx cost data (Annex 20 of the GC0117 Final Modification Report) to ensure costs are appropriately included in the formal CBA.	TBC	Open
21	WG3 (26)	MT/EB	Look into the possibility of including forecasts for future connections	TBC	Open
22	WG3 (26)	MT/EB	Provide raw data behind forecasted embedded generation levels	WG4(27)	Open
23	WG3 (26)	All	Populate the spreadsheet	09/01/26	Open

Attendees

Name	Initial	Company	Role
Claire Goult	CG	NESO	Chair
Jess Rivalland	JR	NESO	Technical Secretary
Alan Creighton	AC	Northern Powergrid	Workgroup Member
Antony Johnson	AJ	NESO	NESO Representative
Amanda Rooney	AR	NESO	NESO Representative Alternate
Benchohra Sayah	BS	NGET	Workgroup Member
Chris Marsland	CM	Clarke Energy Ltd	Workgroup Member
Claire Hynes	CH	RWE	Workgroup Member Alternate
Erin Bell	EB	NESO	Observer

Garth Graham	GG	SSE Generation	Proposer
Graeme Vincent	GV	SP Energy Networks	Workgroup Member
Joe Colebrook	JC	Innova	Workgroup Member
John Brereton	JB	Enviromena	Workgroup Member
Lorna Lewin	LL	Elexon	Observer
Mahmoud Shepero	MSh	NESO	Observer
Madhusudhan Srinivasan	MS	SSEN Distribution	Workgroup Member
Maria Ebue	EB	Voltalia UK Ltd	Workgroup Member
Paul Youngman	PY	Drax	Workgroup Member
Peter Twomey	PT	Electricity North West	Workgroup Member
Richard Wilson	RiW	UK Power Networks	Workgroup Member
Roddy Wilson	RW	SHE Transmission	Workgroup Member
Sundeep Klair	SK	NESO	Observer