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## Code Administrator Meeting Summary

Workgroup Meeting 27: GC0117 – Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements

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**Date:** 21 January 2026

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### Contact Details

Chair: Claire Goult; [claire.goult@neso.energy](mailto:claire.goult@neso.energy)

Proposer: Garth Graham; [garth.graham@sse.com](mailto:garth.graham@sse.com)

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### Key areas of discussion

The aim of Workgroup 27 was to discuss the CBA approach and review the action log.

### Objectives and Timeline

The Chair presented the timeline with the next Workgroup yet to be confirmed.

### CBA Plan Discussion

**CBA Plan Review and Stakeholder Feedback Process:** The Workgroup discussed the process for reviewing the CBA plan, handling stakeholder and DNO feedback, and ensuring full visibility and consensus before progressing to Ofgem, with emphasis on transparency, iterative review, and the need for a clear written timeline.

**CBA Comment Collection and Review:** NESO explained that comments on the CBA plan were collected from stakeholders, with the majority coming from DNOs, and that NESO would review each comment, provide a response, and share these with the workgroup for input before any decisions are finalised or shared with Ofgem.

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**Stakeholder Involvement and Iterative Process:** Several Workgroup members emphasised the importance of the Workgroup having the opportunity to review NESO's responses to comments and to discuss any items NESO deems unachievable, ensuring that all parties can scrutinise and challenge justifications before Ofgem is consulted.

**Concerns Over Informal Ofgem Discussions:** Several Workgroup members raised concerns about NESO having informal discussions with Ofgem before the Workgroup had reviewed NESO's positions, stressing that no positions on what is or isn't achievable should be shared with Ofgem until the Workgroup has had full visibility and input.

**Timeline and Process Clarification:** The Chair agreed to produce a written timeline and process flow for the CBA review, in response to requests for greater clarity and to avoid misunderstandings about the sequence of stakeholder review, NESO response, and Ofgem engagement.

**Scheduling and Next Steps:** The Chair agreed to schedule a follow-up meeting to review NESO's detailed responses to the CBA comments, with the aim of achieving consensus and avoiding unnecessary delays, and to ensure that all relevant documents and feedback are accessible to all Workgroup members.

## DNO CBA Plan Submission

**DNO and Stakeholder Comments on CBA Plan and Data Assumptions:** DNO representatives presented and discussed detailed comments on the CBA plan, focusing on data years, scenario selection, embedded generation, ANM schemes, and the implications of connection reform, with NESO responding to each point and agreeing to clarify or update assumptions as needed.

**Data Years and Benchmarking:** Several Workgroup members questioned the appropriateness of using 2022 as a benchmark year for the CBA, suggesting that

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more recent data (up to March 2025) and forecasts for 2030 should be used to reflect changes in the system. The NESO representative confirmed that the latest available data and forecasts would be incorporated.

**Scenario and Sensitivity Analysis:** The Workgroup discussed the need to update scenario assumptions, including the use of FES pathways, connection reform data, and the impact of new demand and generation patterns, with NESO agreeing to clarify which scenarios and sensitivities would be used and to consult the Workgroup before finalising them.

**ANM Schemes and Retrospectivity:** The Workgroup discussed how ANM schemes and the non-retrospective nature of GC0117 affect the CBA, with DNOs pointing out that many generators in the 'connection queue' being managed via the connection reform process have already applied for a connection and therefore will not be impacted as the current proposal is not retrospective. NESO agreed to clearly state assumptions and consider sensitivities as appropriate.

**Data Sharing and Operational Implications:** Several Workgroup members raised concerns about the operational and IT implications of data sharing requirements (e.g., BC 1.6), especially for DNOs not currently subject to the same thresholds as in Scotland.

**Collation and Accessibility of Comments:** The Workgroup discussed the collation of DNO and other stakeholder comments, ensuring that all feedback is included in the CBA plan and accessible to all members, with NESO and Amanda confirming that all comments would be consolidated and shared, and that any issues with document access would be addressed.

## Actions review

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Due to the meeting time constraints only actions 5, 9, 15, and 17 were reviewed which all remained ongoing. During the Workgroup review on action 17 the following discussions were captured:

**Consequential Code Changes and Implementation Challenges:** The Workgroup discussed the need for consequential code changes, compliance processes, and implementation challenges associated with GC0117, highlighting the unique situation of this modification and the need for further work on compliance, data flows, and resource allocation before full implementation.

**Consequential Code Modifications:** Workgroup members identified several areas requiring further code modifications if GC0117 is approved, including compliance processes, changes to BC1.6, SQSS, and CUSC. The Workgroup agreed to have a repository slide to track these items, with the NESO representative agreeing to circulate and update the slide as needed.

**Compliance Testing Responsibilities:** The Workgroup discussed whether DNOs or NESO should be responsible for the compliance testing of generators under the new thresholds, several Workgroup members discussed current practices and the potential need for resource reallocation or additional support. The NESO representative confirmed that further discussion and clarification are required.

**Implementation Timeline and Resource Implications:** The Workgroup discussed the sufficiency of the proposed 2027 implementation date, with concerns raised about whether DNOs and NESO have adequate time and resources to implement the necessary IT and operational changes. The Proposer noted that previous consultations and Workgroup discussions had considered these issues.

**Unique Nature of GC0117 Process:** One Workgroup member noted that unlike typical Grid Code modifications, GC0117 is progressing to Ofgem with several unresolved consequential issues, and that the Workgroup does not yet have a complete solution for all parties, highlighting the need for ongoing work and coordination.

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## Next Steps

The scheduling of the next meeting to be based on when NESO will be ready to present their views on the CBA items for discussion.

## Action log

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

Action Number Raised	Workgroup	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
15	WG2 (25)	JB/CG	To email concerns regarding connection to Chair to circulate with connection colleagues	TBC	Open
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	Open
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

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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
24	WG4 (27)	AJ	Clarify the BC 1.6 data sharing requirements, including what data is required from DNOs for operational and constraint purposes and the associated timescales.	WG5 (28)	New
25	WG4 (27)	JR	Prepare and circulate a written timeline of the CBA review process flow for the Workgroup to clarify steps and sequencing.	WG5 (28)	New
26	WG4 (27)	AJ	Provide a slide listing consequential code changes (e.g., compliance, data flows, SQSS, CUSC) to the Workgroup and allow members to add further items as needed.	WG5 (28)	New

## Attendees

Name	Initial	Company	Role
Jess Rivalland	JR	NESO	Chair
Andrew Hemus	AH	NESO	Technical Secretary

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Garth Graham	GG	SSE Generation	Proposer
Alan Creighton	AC	Northern Powergrid	Workgroup Member
Amanda Rooney	AR	NESO	NESO Representative Alternate
Andrew Allan	AA	NESO	NESO Representative Alternate
Andrew Hood	ANH	NGED	NESO Representative
Antony Johnson	AJ	NESO	NESO Representative
Ben Sayah	BS	NGET	Workgroup Member
Bukky Daniel	BD	EDF	Workgroup Member
Calum Watkins	CW	Ofgem	Authority Representative Alternate
Chris Marsland	CM	Clarke Energy Ltd	Workgroup Member
Claire Hynes	CH	RWE	Workgroup Member Alternate
Graeme Vincent	GV	SP Energy Networks	Workgroup Member
Lorna Lewin	LL	Elexon	Observer
Madhusudhan Srinivasan	MS	SSEN Distribution	Workgroup Member
Mahmoud Shepero	MAS	NESO	Observer
Maria Ebue	EB	Volitalia 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
Sundee Klair	SK	NESO	Observer
Zivanayi Musanhi	ZM	UK Power Networks	Workgroup Member Alternate