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Code Administrator Meeting

Summary

Workgroup Meeting 17: GC0164 Simplification of Operation Code No.2 (OC2)

Date: 22/01/2026

Contact Details

Chair: Deborah Spencer, deborah.spencer@neso.energy

Proposer : Frank Kasibante, frank.kasibantel@neso.energy

Key areas of discussion

The Chair explained that the purpose of the meeting was to consider updated to legal text and interactions with GC0183 and GC0174.

A timeline update provided to the Workgroup.

Concerns raised by Grid Code Panel

The Chair informed the Workgroup of concerns raised by the Grid Code Panel noting the following:

The Grid Code Panel reviewed the Second Code Administrator Consultation for GC0164 on 25 September 2025 and decided not to proceed with another consultation. Instead, they asked the Workgroup to reconvene to address additional comments on the legal text.

A revised project timeline will be brought back to the Panel once interactions between GC0164, GC0183, and GC0174 have been fully assessed. Since that meeting, the Proposer has proactively engaged with Panel members to clarify concerns and encourage their participation in the next Workgroup session to support transparent resolution of outstanding issues.

With Ofgem’s decisions on GC0183 and GC0174 now published, the GC0164 legal text has been updated to reflect the required interactions. An updated timeline for GC0164 will be presented at the January 2026 Grid Code Panel meeting, marking the next key milestone for the modification.

Final Legal Text Approval (including GC0183 and GC0174 interaction)

The Proposer explained that the current modification aims to simplify and rationalise the OC2 text as part of a broader digitalisation and code simplification initiative, emphasising that there is no intention to change obligations, only to streamline the code for potential future benefits.

It was noted that the legal text now incorporates changes from GC0174 and GC0183, which were approved by Ofgem, and these updates were included after waiting for their implementation.

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The Proposer mentioned that most issues with legal text raised previously have been addressed, with some left for further Workgroup discussion, and highlighted ongoing support from the digitalised whole system technical code steering group, which is preparing a report on code simplification.

The Workgroup went on to review and discuss comments received, specifically mentioning feedback from National Grid Ventures.

The Workgroup discussed an issue raised by National Grid Ventures and a longstanding discrepancy relating to HVDC obligations. It was agreed that this matter falls outside the scope of GC0164 and would need to be addressed separately in a future modification. The Workgroup then considered feedback from a Workgroup member, who emphasised the need to improve diagram legibility. This led to agreement that diagrams should move from PowerPoint to Visio to allow easier updates and clearer presentation.

A Workgroup member raised concerns about duplication within the legal text, particularly around performance charts and the use of incorrect diagram titles. The group agreed that avoiding duplication would improve clarity and ongoing maintenance, preferring cross-references rather than repeated diagrams. They also agreed that checkboxes should only be shown where a submission is genuinely required. There was collective agreement that diagram titles must align with current Grid Code terminology—in cases such as “power park module” versus “power generating module”—to prevent unintentionally changing obligations. Where needed, the Workgroup planned to consult legal colleagues before finalising terminology.

The NESO SME confirmed that he would update the legal text to reflect all agreed changes required. The Workgroup also clarified where diagrams and checkboxes should sit within the document to ensure a logical flow.

The Proposer and the Proposer Alternate agreed to make the following updates:

1. Formatting and Structure

Several formatting inconsistencies were identified, particularly within the OC2 diagrams and tables. Required corrections include:

- Standardising swim-lane ordering across all diagrams.
- Aligning all text boxes (top-left), harmonising column widths, and avoiding truncated labels.
- Ensuring figure numbering, captions, and text placement are consistent throughout.
- Preventing tables and diagrams from splitting across pages once tracked changes are accepted.

2. Diagram Revisions

A number of diagram-specific updates were discussed and some amendments suggested:

General OC2 diagrams

- Remove A/B/C labels where not referenced in the legal text.
- Move Figure 11 into the correct subsection (J) to align with its associated requirements.

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- Remove unnecessary duplication of diagrams across OC2, Planning Code (PC) and Data Registration Code (DRC).
- Apply consistent diagram conventions (arrow types, formatting, layout).

Space Weather diagrams

- The existing combined diagram is too large and complex.
- Replace with smaller, clearer diagrams.
- Condense text within boxes and ensure alignment with the established OC2 diagram style.
- Consider using the structure of the Space Weather Industry Protocol (SWIP) diagrams where appropriate and permissible.
- Add a legend if different arrow types remain necessary.

3. Performance Charts – Location and Cross-Referencing

The Workgroup agreed that example performance charts should remain in the **Planning Code (Appendix G)** and should not be duplicated in the DRC. Required actions:

- Remove the recently inserted example charts from the DRC.
- Retain OC2’s descriptive requirements for performance charts (including submission triggers and timing).
- Verify that the current breadcrumb trail OC2 is correct and that obligations remain unchanged.

4. Updates from GC174 and GC183

All legal text approved under GC174 (EU Transparency) and GC183 (Space Weather) must be cleanly incorporated into the simplified OC2:

- Confirm that integrated text from these mods is included verbatim.
- Update renumbered internal cross-references.
- Ensure consequential references in OC7 and DRC Schedule 1 are correctly updated.

5. Ensuring No Change to Obligations

Workgroup members emphasised that simplification must not unintentionally alter existing obligations. As such:

- OC2 obligations regarding performance chart submission (e.g., Statement of Readiness triggers, “week 24”, NESO’s “as required” requests) must be preserved.
- Any structural changes must be accompanied by cross-references to ensure obligations remain fully intact.

Next Steps

The Workgroup agreed that an additional Workgroup was required to review updated to the legal text.

Attendees

Name	Initial	Company	Role
Deborah Spencer	DS	Code Governance, NESO	Chair

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Teri Puddefoot	TP	Code Governance, NESO	Tech Sec
Stuart McLarnon	SM	NESO	Proposer Alternate
Frank Kasibante	FB	NESO	Proposer
Allan Andrew	AA	RWE	Workgroup Member
Alan Creighton	AC	Northern Power Grid	Workgroup Member
Garth Graham	GG	SSW	Workgroup Member
Graeme Vincent	GV	SP Energy Networks	Workgroup Member
Harry Burns	HB	EDF Power	Workgroup Member
Paul Richardson	PR	Northern Power Grid	Workgroup Member
Richard Wilson	RW	UK Power Networks	Workgroup Member
Samuel Gray	SG	NGED	Workgroup Member
Stewart Wylie	SW	SSEN Distribution	Workgroup Member