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# STCP Modification Proposal Form

## PM0153: System Access Reform. Emergency Return to Service (ERTS): Profiling Review.

**Overview:** This modification revisits the criteria for recalling of circuits with longer Emergency Return to Service (ERTS) to help secure the transmission system during the winter periods. It mandates the Winter Risk Policy Form to document system margins, constraints, mitigations, and recall plans. By aligning with proven operational methods, this change enables to progress more winter outages securely, supporting the Transmission Acceleration Action Plan and 2030 clean-power goals.

### Modification process & timetable

1	<b>Initial STCP Proposal Form</b> 10 February 2026
2	<b>Approved STCP Proposal Form</b> 25 February 2026
3	<b>Implementation</b> 10 Business Days after Panel decision

**Status summary:** The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

### This modification is expected to have a: Low impact

Transmission Owners, Transmission Licensees, Generators, System Operators.

#### Proposer's assessment of materiality

A material change – Authority decision

#### Who can I talk to about the change?

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## Contents

<b>What is the issue? .....</b>	<b>3</b>
Why change? .....	4
<b>What is the Proposer's solution? .....</b>	<b>7</b>
Draft Legal Text .....	8
<b>What is the impact of this change? .....</b>	<b>8</b>
Proposer's assessment against STC Objectives.....	9
Proposer's assessment against the STCP change requirements.....	12
<b>When will this change take place? .....</b>	<b>13</b>
Implementation date.....	13
Implementation approach.....	14
<b>Interactions .....</b>	<b>14</b>
<b>Acronyms, key terms and reference material .....</b>	<b>14</b>
Reference material.....	15

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## What is the issue?

During the Winter Period (defined as week 45 of one year to week 9 of the next year), the electricity system experiences heightened operational risk, due to increased demand, reduced generator margin, and the sensitivity of the system to network constraints. Historically, any transmission outage in the winter with an ERTS greater than 24 hours has been avoided because these outages limit the ability to restore key transmission assets quickly in an emergency, increasing the risk of a shortfall in generation margin.<sup>1</sup>

Transmission outages such as the removal of overhead lines, cables, transformers, and busbars reduce the capability of the network to transfer power, a condition known as a network constraint<sup>2</sup>. These constraints can limit the available generation capacity and increase the likelihood of system imbalance.

In recent years, a more flexible, risk-based approach<sup>3</sup> has progressively been incorporated to maintain system security. However, the lack of clear, updated guidance on acceptable ERTS durations in winter means that several rules on outage planning are still applied, like there is the case of the STCP11-1. Without this clarity, many outages that could support essential upgrades or reinforcements are delayed, leading to operational and programme delivery challenges.

In the United Kingdom, the policy in question has been operational during the preceding three winter seasons and is now subject to formal adoption. Analysis of its implementation over this period demonstrates a substantive impact, as evidenced by specific use cases in which the policy has been applied. Notable instances include case studies where the extended ERTS timeframe application resulted in a significant reduction in the constraint limits, thereby substantiating the efficacy and necessity of this formalisation in the STCP11-1. The outage in the case at hand led to a reduction in the constraint limit by approximately 4,000 MW<sup>4</sup>; a significant figure, especially during winter when system margins are typically tighter. Prior to granting approval, the Winter Risk Policy form was completed, capturing critical details about the work, associated risks,

<sup>1</sup> Transmission Acceleration Action Plan, 2025, pp 16-17; 19-21.

<sup>2</sup> [Transmission constraint management | National Energy System Operator](#)

<sup>3</sup> Entso-E, 2025 Biennial Progress Report on Operational Probabilistic Coordinated Security Assessment and Risk Management, 2025.

<sup>4</sup> National Access Policies team at NESO, Case Study: Winter ERTS, 2025-2026.

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mitigations, and system constraints. This structured risk assessment was pivotal in the decision-making process.

Although the Outage Changes process STCP11-1 defines the timelines and obligations for outage planning, it does not currently reflect the new methodologies developed which require a formal but urgent update to achieve our Net Zero ambitions. The current STCP 11-1 procedure lacks alignment with the updated emergency return to service (ERTS) risk-based approach described in the Transmission Acceleration Public Consultation<sup>5</sup>. Paragraph 6.4 in the STCP 11-1 currently lays out what must be done if there is an outage on the Network Electricity Transmission System in the winter period that has an ERTS of 24 hours. However, timeframes which may be greater than 24 hours ERTS are not covered in the current wording of the code in clause 6.4 and consequently in Appendix D. The current process leads to most winter outages with an ERTS time of greater than 24 hours being rejected.

Conversely, the modification to Section 6.4 in paragraph 6.4.1 STCP11 reflects the updated process for applying winter outages with ERTS timeframes greater than 24 hours. Such risk-based methodology involves the submission of a winter risk policy form. The granularity of the data there contained will allow for more outages with an ERTS greater than 24 hours being granted whilst ensuring the safety and security of the transmission system is maintained.

## Why change?

A change is required to ensure that the electricity system can accommodate a greater volume of transmission outages during winter while maintaining system security. This necessity arises from several pressing factors. Firstly, there is an increasing urgency to progress more projects throughout the winter months. System development pressures during winter have intensified and it has become clear that many critical infrastructure projects can no longer be feasibly delivered within the constraints of summer only outage windows.

The current acceptable winter ERTS timeframes are insufficient in supporting the speed and scale of development of the transmission system to allow the UK to meet its 2030 Clean power targets. The existing acceptable ERTS time-limit

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<sup>5</sup> Transmission Acceleration Action Plan, pp 16-17; 19-21, 18-20.

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means that winter outages with an ERTS time-length greater than 24 hours are generally unacceptable and therefore rejected.

To achieve the Clean Power 2030 target, substantial upgrades and maintenance are required across the network. This necessitates transmission owners scheduling outages for MIS equipment. However, the current winter ERTS process is not adapted to the pace and scale needed for the UK to reach its goals.

The amendment to paragraph 6.4 STCP 11 introduces a risk-based approach, allowing outage requests exceeding 24 hours to be incorporated into planning processes, particularly during the winter period. This change is designed to better support the timely delivery of clean energy objectives whilst taking into account the safety and security of the transmission network.

Over the past three seasons, for instance, the Planning team in Network Access Planning (NAP) team in NESO has implemented the Winter ERTS process, leading to substantial cost savings and an increase in outages scheduled during the winter period<sup>6</sup>.

Although some parties may experience increased overlap between outage windows and operational activity, the modification produces wider benefits for system users. The risk-based framework gives NESO the flexibility to accept outages that support project acceleration, reduce future congestion and improve the overall annual balance between summer and winter outages, as highlighted in the Commissioner's Recommendation for OPI<sup>7</sup>. Generators, Non-Embedded Customers and Interconnectors may experience occasional constraints during these outage periods, but the structured assessment ensures that restrictions only occur when the system can safely accommodate them, and early scheduling visibility allows users to plan accordingly.

Importantly, the consultation notes that improvements in winter access directly accelerate reinforcement works, which in turn reduces constraint costs, supports cleaner system operation and decreases delays to major projects. These broader consumer and societal benefits outweigh the limited operational impacts, ensuring that the modification delivers a net positive outcome for the energy system, customers and the transition to clean power.

<sup>6</sup> Facilitates Case Study in Annex 02

<sup>7</sup> Electricity Network Commissioner, Transmission Acceleration Action Plan Companion Report, p. 50.

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In addition, this modification improves winter outage scheduling by aligning STCP11-1 paragraph 6.4 with the risk-based methodology outlined in the OP1 Workstream. The consultation demonstrates that the process could allow up to 60 additional weeks of outages through winter by enabling NESO and the TOs to progress outages that historically would have been rejected under the deterministic 24-hour limit.<sup>8</sup> This impact is particularly important for achieving the clean-power system objectives, as winter months offer valuable delivery windows for major reinforcement schemes. Transitioning from a solely deterministic threshold to a case-by-case probabilistic assessment using margin forecasts, constraint analysis, generator availability checks and interconnector flow assessments ensures that each outage is evaluated on actual system conditions rather than fixed rules. As a result, parties gain earlier and more realistic visibility of outage feasibility. Moreover, this approach increases planning stability while maintaining security, since the risk assessment template requires explicit justification of timing, mitigation actions and contingency arrangements for winter outages.<sup>9</sup>

Furthermore, supporting the delivery targets set for 2030 necessitates that NESO and the TOs optimise the use of the entire calendar year for transmission development. In order to meet the scale and pace of required works within the prescribed timeframe, it is essential to update guidance and formally codify the risk-based process within the System Operator Transmission Owner Code (STC). This measure is crucial for maintaining the sustainability of the approach and guarantees consistency, transparency and auditability in outage planning decisions. In this context, formalising the risk-based methodology through updated procedures will bring several key benefits. It will provide clarity to all involved parties regarding the types and conditions of acceptable outages, ensure that structured checks, mitigations, and validations are consistently applied, and reduce unnecessary delays that have historically resulted from blanket prohibitions on long-ERTS outages. Ultimately, such changes will enhance collaboration and operational efficiency across NESO and the TOs, thereby enabling more efficient and credible outage planning for the electricity system as a whole.<sup>10</sup>

<sup>8</sup> Transmission Acceleration Action Plan, 2025, page 16–17, 21–22.

<sup>9</sup> Transmission Acceleration Action Plan, p 16–17, 18–21.

<sup>10</sup> Transmission Acceleration Action Plan, 16–17

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## What is the Proposer's solution?

Update current practices and ensure the timely progression of essential development works. NESO and the Transmission Owners (TOs) have demonstrated enhanced risk assessment capabilities, which further support the case for change. Their experience has shown that a structured and transparent risk-based assessment can safely allow for longer ERTS outages during winter. This process involves comprehensive analyses, including the evaluation of system margin, the assessment of constraint impacts, the identification of asset-specific risks and the consideration of available mitigations.

The success of recent applications of this methodology confirms that the system can safely tolerate an increased number of winter outages, provided that each is subject to rigorous and thorough evaluation. This approach aligns with the explicit recommendation of the Electricity Commissioner, who has advocated for permitting outages with an ERTS greater than 24 hours during winter, as long as system risk remains at an acceptable level. This recommendation ensures a more balanced distribution of outages between summer and winter but also fosters a more efficient, year-round approach to system planning<sup>11</sup>.

In line with the methodologies applied and recommendations made in the Transmission Acceleration Action Plan, the proposed solution is to update the Procedure STCP 11-1 of the STC. This allows for a more flexible decision-making process leading to an increase of outage admission during the winter period which accounts for the risks of granting a greater degree of flexibility of the system. It was proven in previous analysis by demonstrating<sup>12</sup> Granting outage requests under these conditions is best practice already and it is taking place from almost three years ago. These are outages that otherwise would be rejected but were accepted based upon analysis performed with the outlined constraint and margin calculations. Paragraph 6.4.1 in the STCP 11-1 should align with the following recommendation from the Public Consultation Report in the Transmission Acceleration Action Plan<sup>13</sup> (reviewed):

*"The types of faults on the National Electricity Transmission System in winter tend to have a greater potential for longer repair times and there is a greater*

<sup>11</sup> Transmission Acceleration Action Plan, 2025, pp 16-17. Electricity Network Commissioner, Transmission Acceleration Action Plan. Companion Report, 2023, page 50.

<sup>12</sup> Transmission Acceleration Action Plan, 2025, page 17.

<sup>13</sup> Transmission Acceleration Action Plan 2025, pp. 16-17.



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*potential for circuits to be recalled securing the Transmission System against severe weather conditions. All Outages placed in the Winter Period that have an Emergency Return to Service Time greater than 24 hours, and restrict generation, must have a completed Winter Risk Policy form. The form will capture the nature and criticality of the work along with details of completed mitigating actions”<sup>14</sup>. NESO will get information details of the constraint limit impacts and retain such data for better informed decisions to manage outages. The agreed approach will then be signed off and kept for future reference. The Winter Risk Policy form will be used for at all stages of the planning process to assess the risk of longer ERTS outages in winter.”*

Article 6.4; Paragraph 6.4.1 will contain the modification proposed as per the recommendation agreed in the Transmission Acceleration Action Plan, with the wording proposed in the following section. Also, Paragraph 6.4.1 will redirect to the specific appendix in the STCP11-1 where the standalone ERTS Profiling Form will settle. For that purpose, the ERTS Profiling Form will be included within Appendix D of the STCP 11-1, under the designated heading “ERTS Profiling Form”. This placement ensures that all relevant details and requirements for winter outage risk assessments are clearly outlined and easily accessible to users involved in the planning process.

## Draft Legal Text

The Legal Text is enclosed to this Proposal and can be found in **Annex 01**.

## What is the impact of this change?

The Transmission Acceleration Public Consultation explains that NESO and the TOs have already identified a new way of working that enables outages with longer ERTS times to be scheduled in winter were supported by a structured risk assessment and margin-forecast monitoring. As a result, the change largely formalises practices demonstrated as workable in the recent winter trial during the past three years, meaning that affected parties experience procedural efficiency rather than disruptive operational change. Furthermore, the introduction of the Winter Risk Policy Form<sup>15</sup>, ensures consistent data capture and auditability, which supports coordination rather than imposing new material obligations. This modification is expected to have a low impact on Transmission

<sup>14</sup> Transmission Acceleration Action Plan, Section 3.5.1, 2025, pp. 18-20

<sup>15</sup> Transmission Acceleration Action Plan, pages 17-18.



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Owners, NESO, Distribution Network Operators, Offshore Transmission Owners, Non-Embedded Customers, Interconnectors and Generators because it builds upon a process that has already been trialled collaboratively during the past three winter periods<sup>16</sup> and the proposal is to formalise this change.

In fact, the use of an ERTS form it is best practice that is already taking place from the past three years, and this proposal aims to consolidate it in the STCP 11, Section 6, Clause 6.4.1, for the impacts of the change are currently demonstrated to be beneficial for the actors involved. In an example, as shown in our case study,<sup>17</sup> the Transmission Owner (TO) requested an outage on a circuit in the Northeast of England with an ERTS of 24H/48H. The outage reduced the constraint limit by approximately 4.000MW, which is quite a significant amount specially during the winter period where margins might be tight (see **Annex 02**).

Since the ERTS duration extended beyond 24 hours, the winter risk policy form had to be completed before approval for the outage was granted. If the winter risk policy had not been followed, the outage would have been rejected, resulting in delays to critical work needed by the TOs for network upgrades. Not taking the outage would have resulted in the circuit either being faulted or being taken as unplanned.

Proposer's assessment against STC Objectives	
Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon Transmission Licensees by Transmission Licences and the Electricity Act 1989;	<b>Positive</b> A Winter Risk Policy form for ERTS more than 24h, helps consolidating best practice already in place. Transmission Owners will comply with both their licence and Electricity Act duties ensuring that auditable, and timely information remains available for the STC parties, improving governance and coordination in winter outage

<sup>16</sup> Transmission Acceleration Action Plan, Consultation Report, February 2025. <https://www.neso.energy/industry-information/network-access-planning/transmission-acceleration-public-consultation>

<sup>17</sup> National Access Policies Team, NESO, Case Study, Winter ERTS risk management 2026. Annex 02

## Public

	decisions. This ensures that NESO remains compliant with License Condition E4 process.
(b) efficient discharge of the obligations imposed upon the licensee by the Electricity System Operator licence, the Energy Act 2023 and Electricity Act 1989;	<b>Positive</b> Requiring NESO to collect and retain constraint information makes it stay in compliance with the mandate on E4 NESO Licence conditions. Joint sign-off through this code modification on the Winter Risk Policy form enables secure operation while granting access, fulfilling ESO licence duties and statutory responsibilities under the Energy Act 2023 and the Electricity Act 1989. Moreover, the transparent, risk-based process supports accountable decisions in operational timescales.
(c) development, maintenance, and operation of an efficient, economical, and coordinated system of electricity transmission;	<b>Positive</b> The modification will enable works proceed with better phasing and fewer deferrals in the mid-term, improving overall efficiency and economy of coordinated transmission operations.
(d) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity;	<b>Positive</b> While primarily operational, a better description of the information at hand during the Winter ERTS can reduce constraint-driven barriers and scheduling uncertainty for generators and suppliers, leading to informed decisions. Hence, the change may indirectly enhance competitive conditions through fairer, transparent access decisions, though the primary benefits are system efficiency rather than market design.
(e) protection of the security and quality of supply and safe operation of the National Electricity Transmission System	<b>Positive</b> Because every restrictive winter outage requires a signed risk policy capturing mitigations and recall arrangements, NESO can monitor margins and anticipate actions before tight periods. This assures security and quality of supply while

## Public

insofar as it relates to interactions between Transmission Licensees and the licensee*;	allowing necessary works, and interconnector restrictions handled conservatively if applicable.
(f) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC;	<b>Positive</b> Once codified, the ERTS Profiling form institutionalises consistent data, criteria, and approvals across parties, embedding repeatable, transparent practice already occurring from three years ago, which is transferable and replicable while consolidated in the STCP 11-1 article 6.4 text. As a result, administration is streamlined, documentation is retained for future reference, and decision quality improves through common templates and shared analysis during data exchanges.
(g) facilitation of access to the National Electricity Transmission System for generation not yet connected to the National Electricity Transmission System or Distribution System; and	<b>Positive</b> Including a new form for the exchange of information on Winter ERTS may facilitate access to the system. By releasing winter schedules and advancing reinforcement timelines, the modification helps connect projects sooner, which facilitates future generation access to NETS. Moreover, improved plan stability reduces knock-on delays that otherwise hinder connections.
(h) compliance with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency.	<b>Neutral</b> Although primarily domestic in scope, the structured, auditable risk assessment through information exchanges and margin monitoring support compliance-oriented governance. Therefore, including considerations about cross-border impacts by design, reduces the likelihood of non-compliance with applicable regulatory decisions.

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Proposer's assessment against the STCP change requirements <sup>1</sup>	Proposer's assessment
(a) the amendment or addition falls within the terms and arrangements set out in condition E4 of the ESO Licence Standard Condition B12 of the Transmission Licence; and	<p><b>Requirement met</b></p> <p>The amendment respects and does not alter the prescribed modification procedures, ensuring procedural integrity is maintained. The proposed amendment has been carefully reviewed in light of the relevant licence conditions, specifically condition E4 of the ESO Licence and Standard Condition B12 of the Transmission Licence. It is evident that the amendment aligns with the established terms and arrangements, as it does not deviate from the prescribed regulatory framework. Consequently, the change remains firmly within the scope authorised by these licence provisions, ensuring regulatory compliance throughout.</p>
(b) the amendment or addition does not impair, frustrate or invalidate the provisions of the Code	<p><b>Requirement met</b></p> <p>The modification aligns with the established terms and arrangements for system planning and operation, without deviating from the prescribed regulatory framework. It ensures seamless integration with existing arrangements. Rather, it operates in harmony with the existing Code requirements, supporting their continued validity. The amendment has been structured to ensure seamless integration, thereby safeguarding the integrity and enforceability of the Code's provisions without introducing any form of impairment or frustration.</p>
(c) the amendment or addition does not impose new obligations or liabilities	<p><b>Requirement met</b></p> <p>Careful analysis indicates that the amendment does not place any new material obligations, liabilities, or restrictions upon Relevant Parties beyond those</p>

## Public

or restrictions of a material nature on Relevant Parties which are not subsidiary to the rights and obligations of the Relevant Parties under the Code;	already subsumed under their rights and duties as defined by the Code. Any requirements introduced are strictly subsidiary and do not alter the fundamental balance of responsibilities. As a result, the amendment avoids imposing undue burdens and maintains the equitable framework established by the Code.
(d) the amendment or addition is not inconsistent or in conflict with the Code, ESO Licence or Transmission Licence Conditions or other relevant statutory requirements; and	<b>Requirement met</b> Following a detailed assessment, it is confirmed that the amendment is neither inconsistent with nor in conflict with any aspect of the Code, the ESO Licence, or Transmission Licence Conditions. The change has been evaluated against statutory requirements and found to be compatible, ensuring that no discrepancies or contradictions arise. This consistency supports the overall coherence of the regulatory regime and upholds legal certainty.
(e) the Relevant Party Representatives deem that the amendment or addition is appropriate to support compliance with the Code.	<b>Requirement met</b> Based on consultation with Relevant Party Representatives, it has been determined that the amendment is appropriate and effective in supporting ongoing compliance with the Code. Their collective judgement affirms that the change will facilitate adherence to Code obligations and promote operational alignment. The amendment is thus viewed as beneficial, reinforcing the commitment to regulatory compliance and best practice within the industry.

## When will this change take place?

### Implementation date:

10 Business Days after Panel Decision.

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## Implementation approach:

This modification does not contain any process or system changes please refer back to the impacts section.

## Interactions

☐ Grid Code      ☐ BSC      ☐ CUSC      ☐ SQSS  
☐ European      ☐ Other      ☐ Other  
 Network Codes      modifications

PM0153 does not have any cross code or modification interactions.

## Panel Determination

Party	Determination
<b>National Energy System Operator (NESO)</b>	To be updated following Panel determination
<b>National Grid (TO)</b>	To be updated following Panel determination
<b>Offshore Transmission Owners (OFTOs)</b>	To be updated following Panel determination
<b>Scottish Hydro Electric Transmission plc (SHET)</b>	To be updated following Panel determination
<b>SP Transmission Limited (SPT)</b>	To be updated following Panel determination

## Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CM	Code Modification
CUSC	Connection and Use of System Code
DC	Direct Current
E4	ESO Licence Condition E4

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ERTS	Emergency Return to Service
GW	Gigawatt
HV	High Voltage
LV	Low Voltage
MW	Megawatt
NAP	Network Access Policies (team at NESO)
NESO	National Energy System Operator
NETS	National Electricity Transmission System
OPI	Operational Planning Workstream 1 (Transmission Acceleration Action Plan)
SQSS	Security and Quality of Supply Standards
STCP	System Operator Transmission Owner Code Procedure
STC	System Operator Transmission Owner Code
TO	Transmission Owner
UK	United Kingdom

Annex	Information
Annex 01	PM0153 Legal Text
Annex 02	PM0153 Case Study

## Reference material

- [Clean Power 2030 Action Plan, 2024](#)
- [Electricity Networks Commissioner – Companion Report Findings and Recommendations](#)
- [ENTSO-E Biennial Progress Report on Operational Probabilistic Coordinated Security Assessment and Risk Management, 2025](#)
- [NESO Transmission constraint management](#)
- [NESO System Access Reform](#)
- [Transmission Acceleration Action Plan](#)