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# Code Administrator Meeting Summary

## Workgroup Meeting 2: GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems

**Date: 11 March 2026**

### Contact Details

Chair: Lurrentia Walker, [Lurrentia.walker@neso.energy](mailto:Lurrentia.walker@neso.energy)

Proposer: Dozie Nnabuife, [Dozie.Nnabuife@neso.energy](mailto:Dozie.Nnabuife@neso.energy)

## Key areas of discussion

### Introduction and Code Modification process

The Chair welcomed the Workgroup members and observers to Workgroup 2 and gave a brief outline of the agenda. Quoracy was agreed.

### Objectives and Timeline

The Chair discussed the timeline for GSR035 modification, highlighting the target date for issuing the draft Workgroup Consultation as 22 April.

### Action Log

**Action 01:** Terms of Reference: Submit the proposed amendment to change the word "explain" to "consider" in the Terms of Reference (d) to the SQSS Panel for approval. This has been submitted for March Panel approval. Action 01 remains open.

**Action 02:** Case Studies Presentation: Prepare and present additional case studies at the next WG meeting, focussing on examples where outages move from insecure to secure and include Scottish practices for comparison. The Workgroup members discussed further case studies and requested, further clarification on numerical values, such as:

- Voltage levels
- Overload magnitudes
- Generator effectiveness
- Model assumptions and DNO modelling accuracy

Action 2 remains open.

**Action 03:** Clarification of Unacceptable Overloading Interpretation: Clarify and document how "unacceptable overloading" is interpreted and applied in practice by NESO and the three TO's in both Scotland, England & Wales, and present findings at the next meeting. To be addressed in the presentation. Action 03 remains open.

**Action 04:** Legal Text Review for Clause 5.11.3: Review and confirm the accuracy of the draft legal text for proposed clause 5.11.3 ensuring correct references and alignment with intended scope and share with Workgroup. Action to remain open and to be discussed at next meeting. Action 04 remains open and is deferred for discussion at Workgroup 3.

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**Action 05:** Consideration of Alternative approaches to SQSS: Investigate and report on whether alternative approaches such as temporary derogations or tools similar to connect and manage have been considered instead of deleting elements from the SQSS.

The Workgroup members discussed, moving from derogations to a codified process, prompted by Ofgem’s direction to reduce reliance on bespoke derogations.

### Core Issues raised:

- Current position: Network operators formally apply for derogations when they cannot meet SQSS requirements.
- Proposed direction: Explore whether aspects (e.g., outage related constraints) can be codified, removing the need for repeated derogation requests.

### Concerns Raised:

Concerns about legal robustness, questioning:

- Is it lawful for networks to rely on a codified process instead of a formal derogation?
- Does codifying flexibility effectively create a “pseudo derogation”, and is that acceptable in law?
- Will this new process apply only to outage related issues, or potentially across broader areas of the code?
- The need to ensure the consultation clearly explains; what the new process replaces, where derogations are still required and the legal basis underpinning any change.

The Proposer clarified that the intention was not to create pseudo derogations, the task is to assess whether this specific scenario can be legitimately codified. If codification is appropriate and endorsed by the workgroup and committee, derogations would no longer be required for this case only and if not codifiable, the derogation route remains. The context provided by Workgroup members, regarding Ofgem is steering towards codifying flexibility to reduce reliance on bespoke derogations, which are slow and administratively heavy. The Workgroup members agreed to close action 05.

**Action 06:** Impact Assessment for GSR036 on generators: Ensure the impact assessment for GSR036 includes consideration of impacts on generators, particularly nuclear plants. The Proposer confirmed that the impact assessment has been completed and will be presented to the SQSS Panel on 24 March. The Chair also noted that as GSR036 is proceeding to Code Administrator Consultation, industry will have opportunity to respond to that Consultation. Action 06 is closed.

## Case Studies:

### Case Study 1 – Scotland (Boundary B4 – Constrained Boundary)

The NESO SME discussed case study 1 which demonstrated how cascade tripping is already used in Scotland to manage overloads during outages.

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### Key Points:

- Outage on the B4 boundary and low network flexibility meant a double circuit fault led to overloads on the 132 kV network.
- Scotland treats 132 kV as transmission, unlike England/Wales.
- No feasible redispatch actions existed; however, cascading a 132 kV circuit was possible and caused no wider disturbance.
- Benefits:
  - Increased constraint limit by 300–350 MW.
  - Avoided significant balancing costs.
- Action raised to include explicit SQSS clause references in the written case study.

### Case Study 2 – Scotland (North-west- Scotland – Operability Challenge)

The NESO SME discussed case study 2 which showed how operational constraints—not just thermal limits—drive decisions.

#### Key Points:

- Outage involved two transformers (SGTs) and an LMI circuit.
- A double circuit fault would overload the remaining SGT, but the overload would persist because protection thresholds were not triggered-.
- Only viable mitigation was cascading the remaining SGT, as generator effectiveness was low.
- Alternative (pre-fault- CT removal) created demand security risks.
- Group requested clear identification of which SQSS clause obliges the assessment.

### Case Study 3 – England & Wales (Mesh Corner Outage – Voltage- Driven- Constraint)

The NESO SME discussed case 3 to illustrate how 5.11.3 (risk based- approach) might allow certain outages that fail 5.4 under current rules.

#### Key Points:

- Mesh corner outage needed to install new voltage- related- equipment.
- Under a second mesh c- orner fault, voltage deviations would occur at surrounding GSPs.
- Using the proposed 5.11.3:
  - If probabilistic assessment shows no widespread disturbance *and*
  - TOS/DNOs/generators agree to mitigations,
  - The outage *could* go ahead.
- Risks identified:
  - Potential equipment damage and safety concerns.
  - Possible loss of demand and generators.
- Multiple members challenged whether:
  - Safety risks were compatible with TO legal obligations.
  - Cascade solutions should have been considered here.

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- Action: revise text; add SQSS references; clarify “affected users”.

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### **Case Study 4 – England & Wales (Constraint Driven – Increasing Limit via Cascade)**

The NESO SME discussed how cascade tripping can increase constraint limits, creating outage headroom.

#### Key Points:

- Low wind in Scotland → power flowing north; outage in NE England.
- Double circuit- fault overloads adjacent circuit.
- Cascade tripping that circuit caused no impacts on DNOs or generators and no widespread disturbance.
- Enabled an increase in constraint limit of ~600 MW.
- Useful in reducing scrutiny/sanctioning requirements and accommodating more outages.
- As with earlier examples, members asked for explicit SQSS clause justification.

Across all four example Case studies the Workgroup members requested clarification on:

- Explicit SQSS clause mapping for every fault and mitigation.
- Quantitative data (voltages, overload values, generator effectiveness).
- Clarity on safety responsibilities, STC obligations, and TO limits.
- Assessment of which case studies would be permitted under proposed wording.
- Back casting or -forward-looking evidence on how modifications would unlock outages-.

The Workgroup members raised several areas requiring clarification before progressing with SQSS changes, particularly around Chapters 5, 2 and 4 to include:

#### **Fault Types Requiring Assessment**

Workgroup members requested an explicit SQSS clause reference to justify why double circuit, busbar and mesh corner faults appear in case studies. There is concern that some examples reflect custom/practice rather than SQSS requirements.

#### **Interpretation of “Unacceptable Overload”**

Different interpretations exist between Scotland and England & Wales on what is meant by ‘Unacceptable Overload, the Workgroup questioned whether a harmonised approach should now apply.

#### **Insufficient Quantitative Data**

Case studies were considered too qualitative. Workgroup members requested numerical values for voltages, overload magnitudes, generator contributions, modelling assumptions and DNO data quality.

#### **Safety and Asset Protection**

Workgroup members raised concerns that relaxing criteria may introduce equipment or

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substation safety risks and affect TO compliance with Electricity at Work Act. Workgroup members expressed that roles and responsibilities for safety require clarification.

### **Definition of “Affected Users”**

Workgroup members requested for a clear definition, whether this includes only TOs/DNOs and transmission connected generators, or distribution connected users as well.

### **Evidence of Outage Benefits**

Workgroup members showed uncertainty about whether proposed changes to 5.4 and 5.11 would enable more outages. The Workgroup requested further examples on modelling of expected benefits and back casting historical case to provide further clarity.

### **Interaction with Chapters 2 and 4**

A Workgroup member expressed concerns that modifying Chapter 5.4 could reduce generation connection resilience and impact wider system planning requirements. A fuller assessment of these linkages is needed.

### **Cascade/Overload Protection Schemes**

Clarification was requested on how cascade inter-tripping should be treated, whether it avoids unacceptable overloads, and why it was not included in Case Study 3.

### **Purpose of Clause 5.11**

Workgroup members challenged whether 5.11 is an appropriate mechanism for bypassing criteria. Some Workgroup members argued that clearer voltage/thermal limits would be preferable.

### **Need for a Clear Problem Statement**

Several Workgroup members reiterated the need to clearly articulate the specific issue being solved and which SQSS wording currently blocks outages before progressing to legal drafting.

### **Review of Draft Legal Text**

The draft legal text was postponed and will be reviewed at the next Workgroup Meeting.

### **AOB**

There was no AOB raised.

### **Next Steps**

Next Workgroup Meeting – 30 March, 10am – 13:00pm

## Public Actions

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

Action Number Raised	Workgroup	Owner	Action	Due by	Status
07	WG2	DN/SP	Case studies to be updated with clause-by-clause SQSS walkthroughs.	WG3	Open
08	WG2	DN/SP	Engagement with "Affected Users" Request to explicitly define and document this in reports and slides.	WG3	Open
09	WG2	DN/SP	Impact of Proposed Changes on Safety and Asset Protection: Clarification requested on who is responsible for safety and how this interacts with SQSS.	WG3	Open
10	WG2	DN/SP	Relationship Between Chapter 5.4 Changes and Chapters 2 & 4 Concern that any changes made to 5.4 will impact chapter 2 and 4 of the SQSS. Request for this linkage to be fully assessed.	WG3	Open
11	WG2	DN	Need for Clearer Problem Definition: Clarify this before modifying legal text.	WG3	Open
12	WG2	DN	Purpose and Scope of 5.11 (Risk-Based Approach) Request to revisit the rationale before moving to legal text drafting.	WG3	Open

## Attendees

Name	Initial	Company	Role
Lurrentia Walker	LW	NESO, Code Administrator	Chair

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Karen Stanton-Hughes	KSH	NESO, Code Administrator	Technical Secretary
Dozie Nnabuife	DN	NESO	Proposer
Steve Baker	SB	NESO	NESO Rep
Saun Pereira	SP	NESO	NESO SME
Alan Creighton	AC	Northern Powergrid	Workgroup Member (Alternative)
Andy Lister	AL	Northern Powergrid	Workgroup Member
Calum Watkins	CW	Ofgem	Authority Representative
Daniel (Bukky) Oluwabukola	BD	EDF Power	Workgroup Member
Garth Graham	GG	SSE Generation	Workgroup Member Alternative
Graeme Vincent	GC	SP Energy Networks	Workgroup Member Alternative
Mark Bowker	MB	National Grid	Workgroup Member
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Roddy Wilson	RWi	SSE Transmission	Workgroup Member
Fraser Scott	FS	SSE Transmission	Workgroup Member Alternative
Steve Quinn	SQ	National Grid Electricity Distribution	Workgroup Member
<b>Observers</b>	<b>Initials</b>	<b>Company</b>	<b>Role</b>
Amanda Rooney	AM	NESO	Observer
Andrew Henderson	AH	NESO	Observer
Daniel Auty	DA	NESO	Observer
Hector Perez	HP	Scottish Power Renewables	Observer
Ian Larsson	IL	NESO	Observer

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Iwan Watkin	IW	Jacobs	Observer
Matt Chapman	MC	NESO	Observer
Maria Lopez	ML	NESO	Observer
Russell Woodman	RWo	NESO	Observer
Shannon Murray	SM	Scottish Power Renewables	Observer
<b>Apologies</b>	<b>Initials</b>	<b>Company</b>	<b>Role</b>
Andrew Urquhart	AU	SSE Generation	Workgroup Member