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Code Administrator Meeting

Summary

Workgroup Meeting 21: GSR030 'Offshore DC Connections'

Date: 10 March 2026

Contact Details

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

Proposer: Bieshoy Awad, bieshoy.awad@neso.energy

Key areas of discussion

The Chair opened Workgroup 21, thanking members for attending and expressed appreciation for continued engagement. The Chair explained that the agenda had been adjusted to allow the group to focus on specific key items rather than reviewing all comments in detail during the meeting. Members who had submitted written comments were thanked for their input and confirmed that individual follow-up meetings will be arranged to discuss comment sets in depth.

Timeline

The Chair presented the timeline for GSR030 which highlighted the Consultation period of 06 February 2026 – 27 February 2026, with the intention of one further Workgroup prior to moving to the Workgroup Consultation stage.

Workgroup Consultation Discussion

The Proposer outlined the implementation approach for Option 4, highlighting the need for a new industry standard to define risk calculation requirements and acceptable risk levels for subsea cables. This standard, expected to align with CBRA principles, would fall under the ENA framework and be supported by the regulatory regime.

The Proposer explained that all subsea cable installers must comply with the standard, which applies universally rather than on a project specific basis. Cables that do not meet the required risk threshold would be subject to derating. Risk assessments must consider both the installer's own assets and neighboring cables. The Proposer also described the process for managing changes in risk, including situations where external factors, such as altered shipping patterns or seabed conditions, lead to increased exposure. In such cases, parties must notify NESO, and cable capacity may be restricted until investigations are completed and compliance with the required risk level is restored.

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The Workgroup members discussed the following:

Governance of the New Subsea Cable Risk Standard

The Workgroup discussed whether the proposed subsea cable risk standard should sit under ENA governance or be incorporated into the Grid Code. A Workgroup member advocated Grid Code inclusion to ensure open governance and equal participation across all affected parties, while the Proposer preferred ENA governance.

One Workgroup member clarified the current governance arrangements, noting that interconnectors and OTSDUW users may not be represented within ENA processes. The Workgroup agreed that further consideration was required.

Implementation and Enforcement

The Workgroup members examined the process for establishing subsea cable risk levels and how any fluctuations in risk would be monitored and addressed. They also considered the potential impacts these changes could have on both asset owners and generators. Throughout the discussion, participants emphasised the importance of having well-defined procedures for implementing and enforcing the new requirements to ensure clarity and consistency across the industry.

Workgroup members stressed the need for clear and transparent compensation and cost recovery procedures, especially when changes in risk lead to restrictions or additional costs for asset owners or generators. They also noted that any regulatory measures may need to be supported by modifications to the CUSC framework to ensure alignment and effective implementation.

Prospective vs. Retrospective Application

The Workgroup members considered whether the new standards should apply only to future projects or also to existing and “in construction assets.” One Workgroup member supported a prospective only approach focused on future bipole projects above 1800 MW, to avoid unnecessary disruption and provide clarity for upcoming development. A number of the Workgroup members cautioned that retrospective application could negatively affect projects already underway and would require broader consultation.

Potential Split of Modifications

The Workgroup members discussed splitting the modification into prospective and retrospective elements to progress the prospective changes while allowing more time to address complex retrospective issues. The Proposer expressed concern that this could reduce engagement on the retrospective element but agreed to consider the proposal further with stakeholders and Ofgem.

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Operational Precedents

Workgroup members reviewed current onshore practices, including flood protection standards and price control frameworks suggesting that these established approaches could serve as valuable references for developing effective offshore cable risk management strategies.

Risk Assessment and Monitoring

The Workgroup members discussed current subsea cable survey practices, including survey frequency and how burial depth and risk data are assessed, giving rise to:

- Uncertainty regarding how shipping activity is incorporated into risk assessments.
- Changes in risk often driven by specific events (e.g., anchor drags) rather than incremental change and questioned whether a central monitoring body is required.

One Workgroup member proposed that routine surveys should be carried out to evaluate cable burial and associated risks but expressed uncertainty regarding the extent to which shipping activities are included in these evaluations. Although consultants may contribute insights, the member emphasised the need for greater transparency in this area. Additionally, it was suggested that major changes in risk typically arise from isolated incidents, such as anchor drags, rather than from gradual developments. The member also raised the question of whether an industry-wide central authority should be established to monitor shipping activity and risk factors.

The Proposer stated that addressing changes in risk is a routine part of regular operations. However, they also recognised the importance of evaluating the potential scale of these impacts and identifying effective methods for managing them.

Next Steps

The Proposer to consider the various suggestions and concerns raised, with a plan to consult further with Ofgem and update the Workgroup on the way forward, inviting members to reach out via email, with additional concerns in the interim.

Actions

Action Number Raised	Workgroup	Owner	Action	Due by	Status
68	WG21	BA	Investigate and decide whether the new cable risk standard should be governed under the ENA or Grid Code, considering inclusivity and	WG22	Open

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			transparency for all affected parties.		
69	WG21	BA/GG	Articulate in the consultation document that a CUSC modification for generator cost recovery in the event of rapid risk changes is being considered, and coordinate with GG regarding raising the modification	WG22	Open
70	WG21	BA	Consider splitting the modification into prospective and retrospective elements and determine how to ensure productive engagement and avoid stalling, including consulting with Ofgem for direction.	WG22	Open
71	WG21	RC	Clarify the process for regular risk assessments, including whether shipping activity is reviewed and how updates are incorporated, and report findings at the next meeting.	WG22	Open
72	WG21	BA	Develop a plan to engage with all relevant users, including OFTOs and those with projects under construction, to assess risk levels and potential impacts of retrospective application.	WG22	Open

Attendees

Name	Initial	Company	Role
Deborah Spencer	DS	NESO	Chair
Karen Standton-Hughes	KSH	NESO	Technical Secretary
Bieshoj Awad	BA	NESO	Proposer
Fiona Williams	FW	NESO	Proposer (Alternate)
Benjamin Marshall	BM	SSE	Workgroup Member
Garth Graham	GG	SSE	Workgroup Member
Jonathon Hoggarth	JH	EDF	Workgroup Observer
Nicola Barberis Negra	NBN	Ørsted	Workgroup Member

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Nigel Platt	NP	Siemens Energy	Workgroup Alternate
Paul Drew	PD	Ofgem	Authority Representative
Roddy Wilson	RW	SSEN Transmission	Workgroup Member
Roger Carter	RC	Transmission Investment	OFTO
Simon Allison	SA	EDF Power	Workgroup Observer
Stephen Baker	SB	NESO	NESO Representative
Xiao-Ping Zhana	XZ	Birmingham A.C	Workgroup Member