Public

SQSS Code Review Panel

Date: 05/12/2025	**Location: Microsoft Teams**
Start: 13:00	**End: 15:00**

Participants

Attendee	**Initials**	**Company**
Jess Rivalland	JR	Chair
Karen Stanton-Hughes	KSH	Panel Technical Secretary
Alan Creighton	AC	Panel Member, Network Operator Representative
Antony Johnson	AJ	Panel Member, NESO Representative Alternate
Bieshoy Awad	BA	Panel Member, NESO Representative
Bless Kuri	BK	Panel Member, SHET Transmission Operator Representative
Callum Watkins	CW	Authority Representative
Claire Newton	CN	NESO Representative
Cornel Brozio	CB	Panel Member, SP Transmission Representative
Dovile Kvedyte-Corrigan	DKC	Authority Representative Alternate
Garth Graham	GG	Panel Member, Generator Representative
Graeme Vincent	GV	Panel Member, SP Transmission Representative
Le Fu	LF	Panel Member, NGET Representative
Martin Brown	MB	Panel Member, OFTO Representative
Paul Drew	PW	Authority Representative
Roddy Wilson	RW	Panel Member, SHET Transmission Operator Representative
Observers / Presenters	**Initials**	**Company**
Amanda Rooney	AR	NESO Representative – Observer
Dozie Nnabuife	DN	NESO Proposer - Presenter
Kiran Mann	KM	NESO Representative - Observer
Maria Lopez	ML	NESO Representative - Observer

Shaun Pereira	SP	NESO Representative - Observer

Apologies

Attendee	Initials	Company
Mike Lee	ML	Panel Member, OFTO Representative
Roger Carter	RC	Panel Member, OFTO Representative
Roger Morgan	RM	Panel Member, OFTO Representative

1. Introductions and Apologies

The Chair welcomed Panel members and thanked them for attending the meeting. Apologies were received from Mike Lee, Roger Carter, and Roger Morgan.

2. Minutes from previous meeting

The meeting minutes from the SQSS Panel held on 29 July 2025 and 31 October 2025 were approved, subject to minor comments from the Panel being incorporated, and these have been uploaded to our website.

3. Review of actions log

The SQSS Panel reviewed the open actions:

Action 40.8: Open. This action will remain "pending" until the GC0117 solution is either approved or rejected by Ofgem. AJ to report back at next SQSS Panel. GG to consider the necessity of drafting a consequential SQSS modification alongside GC0117.
Action 42: Open. PD to check with Adam Gilham, within Ofgem, for confirmation report back at next SQSS Panel.
Action 34: Closed. SAR (System Access Reform) slides updated.
Action 44: Open. PD to review the interaction of OFTO regulations covered by the Grid Code and discuss with BA.
Action 45: Closed. JR circulated slides.
Action 46: Open. PD to report back at next SQSS Panel.

4. Authority Decisions

There were no Authority decisions.

5. New modifications

GSR035: 'System Access Reform; review of the operational requirement in England and Wales'.

DN delivered a presentation on GSR035 and explained that the purpose of the modification is due to the current regulatory framework governing the planning and operation of the electricity transmission network and how it is characterised by excessive rigidity. This inflexibility often impedes essential maintenance and upgrades, even when the associated risks are minimal. As a result, progress is slowed and projects that could deliver significant consumer benefits are delayed.

The Panel discussed the Modification which centres around the System Access Reform (SAR), a cross-industry initiative led by NESO, Scottish Power, and SSEN, aiming to modernise the planning and operation of the UK's electricity transmission network. The reform responds to recommendations from the Electricity Network Commissioner's (ENC) report in June 2023 which highlighted the need to accelerate network development to meet Clean Power 2030 and Net Zero 2050 targets. The SAR program is designed to enable critical upgrades and maintenance by introducing greater flexibility and risk-based decision-making into outage planning, moving away from rigid, prescriptive rules that can delay essential works.

The Proposal seeks to allow for case-by-case relaxation of operational criteria, especially for low-probability, low-impact events. This would enable more outages to proceed when risks are deemed acceptable, following thorough risk assessments involving all stakeholders (NESO, TOs, DNOs, DCCs). A new risk assessment form and methodology would be developed to evaluate fault likelihood and risk mitigations, ensuring that only outages with manageable risks are approved. The process for approving risk-based decisions will be made more transparent, with clear Terms of Reference and stakeholder engagement. The methodology may be captured within the SQSS or as a separate license obligation, subject to Ofgem approval.

The Workgroup will consider increasing the maximum permitted loss of supply from 1500 MW to 1800 MW, aligning operational criteria in England and Wales with

those in Scotland. The Workgroup will analyse the merits and risks of proposed changes, develop Terms of Reference, and consult on implementation options.

Panel decision on the modification - The Proposal and timeline will be circulated for Panel approval via email, with the aim of expediting Workgroup nominations and avoid delays. Considerations for the Proposer to include in update of the Proposal are:

- Should operational criteria in England and Wales be bought in line with Scotland's more flexible approach.
- How should the risk assessment process be governed, and what level of transparency is appropriate.
- Is increasing the loss of supply threshold justified, and what are the broader implications.
- The Workgroup may address these questions independently, allowing for quicker resolution of straightforward issues while continuing to deliberate on more complex aspects.

GSR036: 'System Access Reform; Review of the Voltage Limits'

DN delivered a presentation on GSR036 and explained that the purpose of the modification is the current NETS SQSS Section 6 criteria set the upper voltage limit for operational timescales (200kV to 300kV) too low and do not allow short-term flexibility, even when such flexibility would not negatively impact the NETS.

The proposed modification aims to introduce more flexibility, enabling decisions to be based on actual risk and expert judgment. The Panel discussed modification GSR036, and reviewing and potentially revising voltage limits in the SQSS for the UK electricity transmission network. The discussions focused on the 275kV upper voltage limit, which was reduced from 10% to 9% in 2017 to align with IEC standards. However, NESO has since identified multiple cases where outages were rejected due to non-compliant voltages near 10%, causing delays in key projects and requiring derogations to proceed.
The current Section 6 voltage limits are considered too low by several reports and stakeholders. The network and equipment can withstand up to 10%, but the standard is set at 9%, restricting flexibility for upgrades and maintenance.

The Panel discussed reverting the voltage limit back to 10% to align with the Grid Code and IEC standards. This change would enable more outages to proceed, reduce delays, and streamline project delivery.

Panel decision on the modification - The Proposal and timeline will be circulated for Panel approval via email. Considerations for the Proposer to include in the update of the Proposal are:

- Consensus that short-term flexibility is needed when it is safe to do so.
- The Proposal includes governance modifications and a joint program with the TO's (Transmission Owners).
- Emphasis on the need for clear narrative and supporting material to justify the change and ensure all directly connected customers are consulted and aware of the implications.
- The impact on customer equipment and the importance of transparent communication and consultation.
- The process for moving forward includes updating the Proposal with more case studies and narrative, consulting with stakeholders, and potentially holding additional workshops before formal code administration consultation.

6. In flight modification updates

JR talked the Panel through the progression of the in-flight modifications for GSR029 and GSR030. The in-flight modifications can be found on the NESO website via the following link: SQSS Modifications.

Timeline updates:

GSR029 'Review of Demand Connection Criteria to Align with EREC P2/7'
There were no objections to the timeline.

GSR030 'Offshore DC Connections'
There were no objections to the timeline.

Terms of Reference (ToR) update:

GSR030 'Offshore DC Connections'

BA advised the Panel in regard to ToR d). The amendment evaluates the 1320 MW limit on power infeed loss from outages, originally included in GSR030 but later removed. The solution was updated after consultation to improve clarity, but the legal text remains unchanged. The Proposal anticipates a short-term increase in frequency response costs (expected to be around £12 million per year, but not capped), with benefits including a projected £5.6 billion savings, a 33% reduction in environmental footprint, and a cut of 2 million tonnes in CO_2 emissions between 2030 and 2032. It was clarified that £12 million is an estimate, not a cap. The Panel discussed ToR d) in relation to reliability of data and its relevance to the 1800 MW question, it was confirmed that this has been addressed by modification GSR034. The Panel agreed that ToR d) was no longer relevant and should be deleted.

7. Workgroup Reports

There were no Workgroup reports.

8. Draft Final Modification Reports

GSR034 'Review of Loss of Power Infeed Risk for Offshore DC Converter'

JR presented the Draft Final Modification Report (DMFR) for GSR034 to Panel.

The Panel unanimously supported both the Proposal and the implementation approach, noting alignment with current NESO processes and no major obstacles anticipated. Benefits highlighted include improved transmission network development, lower consumer costs, support for net zero goals, and reduced environmental impacts. Some respondents noted that low-frequency events may increase, but mitigation is feasible and benefits outweigh costs.

The voting form is to be circulated. Panel members were asked to submit their voting statements via email by Monday 08 December 2025. Once all voting

statements and objectives are received, the results will be compiled and sent out for review before submission to Ofgem.

9. Update on other Industry Codes

Links to other Industry Codes recent Panel meetings were included in the Panel Papers.

10. Code Administrator Update

There were no Code Administrator Updates.

11. Any Other Business (AOB)

There were no further updates for Panel.

The next SQSS Panel meeting will be held on 26 January 2026, 14am-15:00pm via Microsoft Teams.
New Modification Proposals to be submitted by 07 January 2026.
SQSS Code Review Panel Papers Day is 13 January 2026.