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Code Administrator Meeting Summary

Workgroup Meeting 3: GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems

Date: 30 March 2026

Contact Details

Chair: Lurrentia Walker, Lurrentia.walker@neso.energy

Proposer: Dozie Nnabuife, Dozie.Nnabuife@neso.energy

Key areas of discussion

The Chair welcomed the Workgroup members and observers to Workgroup 3 and gave a brief outline of the agenda.

Objectives and Timeline

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

Action Log Review

Action 01: (Closed) 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. Timeline confirmed: next workgroup 13 April, potential additional meeting before consultation if needed.

Action 02: (Closed) Case Studies Presentation: Case studies (Scotland and England & Wales) were presented and discussed in detail.

Action 03: (Open) Clarification of Unacceptable Overloading Interpretation: Substantial discussion in Workgroup, revealed ongoing disagreement, particularly around reliance on protection / cascade tripping. To be revisited.

Action 04: (Closed) Legal Text Review for Clause 5.11.3:

Action 05: (Closed) Affected stakeholders confirmed in principle (TOs, DNOs, generators, directly connected users), but governance of involvement remains unresolved (broader governance picked up separately).

Action 06: (Closed) Impact Assessment for GSR036 on generators. Confirmed that clause 5.4 applies only in England & Wales; Scottish examples are illustrative, not changing Scottish arrangements.

Action 07: (Closed) Case studies to be updated with clause-by-clause SQSS walkthroughs. Proposer and NESO SME presented case studies to the Workgroup. During case study discussions, clauses 5.3 and 5.4 were explicitly identified as the blocking clauses.

Action 08: (Closed) Engagement with "Affected Users" Request to explicitly define and document this in reports and slides. Engagement expectations discussed; confirmed need to consider DNOs and users, but where this is codified remains open elsewhere.

Action 09: (Closed) Impact of Proposed Changes on Safety and Asset Protection: Reconfirmed that SQSS does not override asset owner safety duties.

Action 10: (Closed) 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

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linkage to be fully assessed. Confirmed 5.3 and 5.4 are retained; GSR035 adds a new clause 5.11.3 only.

Action 11: (Open) Need for Clearer Problem Definition: Strong emphasis on clarifying this before modifying legal text. Workgroup acknowledged that the problem definition has evolved (from relaxing standards to enabling a risk-based- exception), to be checked against draft consultation text.

Action 12: (Closed) Purpose and Scope of 5.11 (Risk Based Approach)

Request to revisit the rationale before moving to legal text drafting. Change in approach acknowledged and accepted following revised legal text.

Case Studies

The NESO Representative presented 4 case studies and emphasised that the case studies do not propose removing SQSS standards but show situations where a case-by-case risk assessment could permit outages otherwise blocked-. Scottish examples were used as illustrative evidence, not to change Scottish arrangements. England & Wales examples demonstrate the gap GSR035 is intended to address.

Case Study 1 – Scotland: Double circuit- outage and cascade tripping

A double circuit outage on a -high-cost- Scotland boundary resulted in post-fault overloading of a 132 kV circuit, exceeding short-term- ratings.

Current operation

- No post-fault mitigation was available to reduce the overload while maintaining the same constraint limit.
- The consequence of the overload would be removal of the overloaded circuit from service (via protection or TO action), referred to as cascade tripping.
- This did **not** result in widespread disturbance, unacceptable voltage conditions, or loss of supply exceeding SQSS limits.

Outcome

- The outage was permitted under current Scottish arrangements.
- Allowing the cascade increased the constraint limit by ~300–350 MW, delivering significant constraint cost savings.

Purpose in GSR035

Demonstrates how Scottish practice allows outages where consequences are acceptable, illustrating potential benefits if a similar risk-based- approach were available in England & Wales.

Case Study 2 – Scotland: Multiple outages and prudent system operation

An outage involving multiple circuits and transformers created a credible post-fault overload on remaining equipment.

Current operation

- Although the SQSS does not explicitly require securing for the specific contingency in Scotland, NISO and TOs applied prudent operational judgement.
- Without agreement on cascade tripping or suitable protection, the outage would not proceed.

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Outcome

- The outage was only considered acceptable where suitable operational safeguards existed.
- Where safeguards were absent, the outage was rejected despite SQSS permissiveness.

Purpose in GSR035

Illustrates that Scottish arrangements are not a blanket relaxation of standards; operational judgement and safety considerations still constrain outages.

Case Study 3 – England & Wales: Mesh corner outage and voltage non-compliance

A mesh corner outage in England & Wales was required to address long-standing voltage issues, but a post-fault contingency caused unacceptable voltages at multiple GSPs.

Current SQSS position

- SQSS clauses 5.4.2 and 5.4.4 require securing for mesh corner faults and prohibit unacceptable voltage conditions.
- Under current rules, the outage could not proceed.

Potential under GSR035

- A risk-based- assessment could allow the outage if:
 - the probability of the fault is low,
 - impacts are time limited- and mitigated, and
 - affected stakeholders are engaged and accept the risk.

Purpose in GSR035

Demonstrates a clear England & Wales case where current SQSS prevents an outage that could potentially proceed under a tightly governed exception process.

Case Study 4 – England & Wales: Circuit overload and constraint reduction

A double circuit- fault following an outage caused overloading of adjacent primary transmission equipment.

Current SQSS position

- Clause 5.4.3 prohibits unacceptable overloading of primary transmission equipment.
- The outage would normally be constrained to remain within short-term ratings-.

Potential under GSR035

- Allowing cascade tripping where there is no wider system disturbance could increase the constraint limit by ~600 MW, delivering substantial cost savings.

Purpose in GSR035

Shows how a controlled, risk assessed- relaxation could enable economically beneficial outages without compromising overall system security.

Terms of Reference (ToR)

The Chair advised the Workgroup that the SQSS panel approved an amendment and proposed removing a clause requiring engagement of all potentially affected stakeholders because the group is already doing that work.

Stakeholder representation

AC questioned whether all affected groups were represented. DN confirmed the proposal includes DNOS, TOS, and directly connected customers. AH added that it is feasible to reach all DNOS, but not realistic to include every directly connected customer, therefore the focus should

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be on ensuring representation and suggested contacting a small number of directly connected customers for e.g. Network Rail.

Legal Text

The Workgroup discussion about proposed SQSS legal text changes, focussed on a new clause (proposed 5.11.3) that would allow a limited, case-by-case, time-limited variation from existing requirements (clauses 5.3 and 5.4) only when a robust risk-assessment process (approved by the Authority) has been applied.

Key points:

- 5.3 and 5.4 remain the default (BAU) requirements; 5.11.3 is a narrowly scoped exception mechanism.
- The exception applies only for specific secured events under defined background conditions and for a defined duration, where the secured event would otherwise:
 - block planned construction/reinforcement works, or
 - cause constraint costs disproportionate to the risk, or
 - unduly reduce security of supply for demand groups.
- The text does not reduce SQSS standards, change asset-owner safety duties, mandate outage approval, or move approval of individual outages to the Authority—the Authority approves the process, not individual decisions.

The Workgroup noted the drafting is intentionally high-level, with key operational details (risk scope, roles, approval/dispute processes) to be defined elsewhere. That suitability depends on where/how the risk-assessment methodology is governed (inside SQSS vs outside).

The Workgroup accepted the text as a reasonable basis for consultation, subject to governance resolution and stakeholder feedback.

Next Steps

Draft consultation and legal text will be circulated for offline comments, with potential adjustments to the timetable including an extra meeting to resolve outstanding governance and risk-assessment issues while maintaining the July SQSS Panel deadline for the Workgroup Report to be submitted.

Actions

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

Action Number Raised	Workgroup	Owner	Action	Due by	Status
13	WG3	DN	Clarify governance location for the risk-assessment process Determine where the risk-assessment framework will sit (e.g. SQSS appendix, Grid Code, STC, or other mechanism), ensuring it properly includes DNOs and	WG4	Open

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			affected users rather than relying solely on NAP arrangements.		
14	WG3	LW	Seek an offline view from the SQSS Panel on “what vs how “An email query to the SQSS Panel to confirm whether defining the content (“what”) of the risk assessment is appropriate within SQSS or should sit elsewhere. Chair to draft the query and circulate for workgroup sense check before sending.	Open	WG4
15	WG3	DN	Define the scope and minimum content of the risk assessment Develop clarity on what the risk assessment must cover.	Open	WG4
16	WG3	DN/RW	Clarify stakeholder roles, consent, and dispute resolution Define: which parties must be involved (TOs, DNOs, generators, users), whether any party has veto rights, how disagreements are resolved if consensus is not reached.	Open	WG4
17	WG3	DN	Consider an additional Scotland specific case study (clause 5.3) NESO to explore whether a Scottish example linked to loss of supply >1500 MW (5.3) can be added to demonstrate where the new mechanism could apply in Scotland.	Open	WG4
18	WG3	DN	Clarify treatment of financial impacts and compensation Ensure the approach considers: constraint costs, customer compensation exposure (including DNO impacts), interaction with STC and System Access Reform arrangements.	Open	WG4
19	WG3	RW/ALL	Circulate draft consultation and legal text for offline comment	Open	WG4

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			Draft consultation and revised legal text to be shared outside meetings (email where collaboration space access is an issue), with comments reviewed ahead of the next workgroup.		
20	WG3	RW/DN	Review and, if needed, adjust the timetable. Consider adding an extra workgroup meeting and slightly delaying consultation to resolve outstanding governance and risk assessment- issues, without affecting the July SQSS Panel deadline.	Open	WG4
21	WG3	DN/RW	Review the appropriate governance/code location (e.g., Grid Code, STCP, NAP) for the risk assessment process to ensure all impacted users (including DNOS and generators) are properly included.	Open	WG4

Attendees

Name	Initial	Company	Role
Lurretia Walker	LW	NESO, Code Administrator	Chair
Kayte Stanton-Hughes	KSH	NESO, Code Administrator	Technical Secretary
Dozie Nnabuike	DN	NESO	Proposer
Steve Baker	SB	NESO	NESO Rep
Shaun Pereira	SP	NESO	NESO SME
Alan Creighton	AC	Northern Powergrid	Workgroup Member (Alternative)
Amanda Rooney	AM	NESO	Observer
Andrew Henderson	AH	NESO	Observer
Andy Lister	AL	Northern Powergrid	Workgroup Member

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Andrew Urquart	AU	SSE Generation	Workgroup Member
Calum Watkins	CW	Ofgem	Authority Representative
Daniel (Bukky) Oluwabukola	BD	EDF Power	Workgroup Member
Daniel Auty	DA	NESO	Observer
Mark Bowker	MB	National Grid	Workgroup Member
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Matt Chapman	MCh	NESO	Observer
Maria Lopez	ML	NESO	Observer
Fraser Scott	FS	SSE	Workgroup Member
Russell Woodman	RW	NESO	Observer
Steve Quinn	SQ	NGED	Workgroup Member