

Public

Grid Code Review Panel

Thursday 23 April 2026

Faraday House

Public

WELCOME

Purpose of Panel & Duties of Panel Members

The **Panel** shall be the standing body to carry out the **functions** referred to in the Governance Rules **(GR3.1.1)**

Functions (GR.3.2)

The **Panel** shall endeavour at all time to operate:

- In an **efficient, economical and expeditious manner**, taking account of the complexity, importance and urgency of particular Modification Proposals; and
- With a view to ensuring that the **Grid Code** facilitates **achievement of the Grid Code Objectives**.

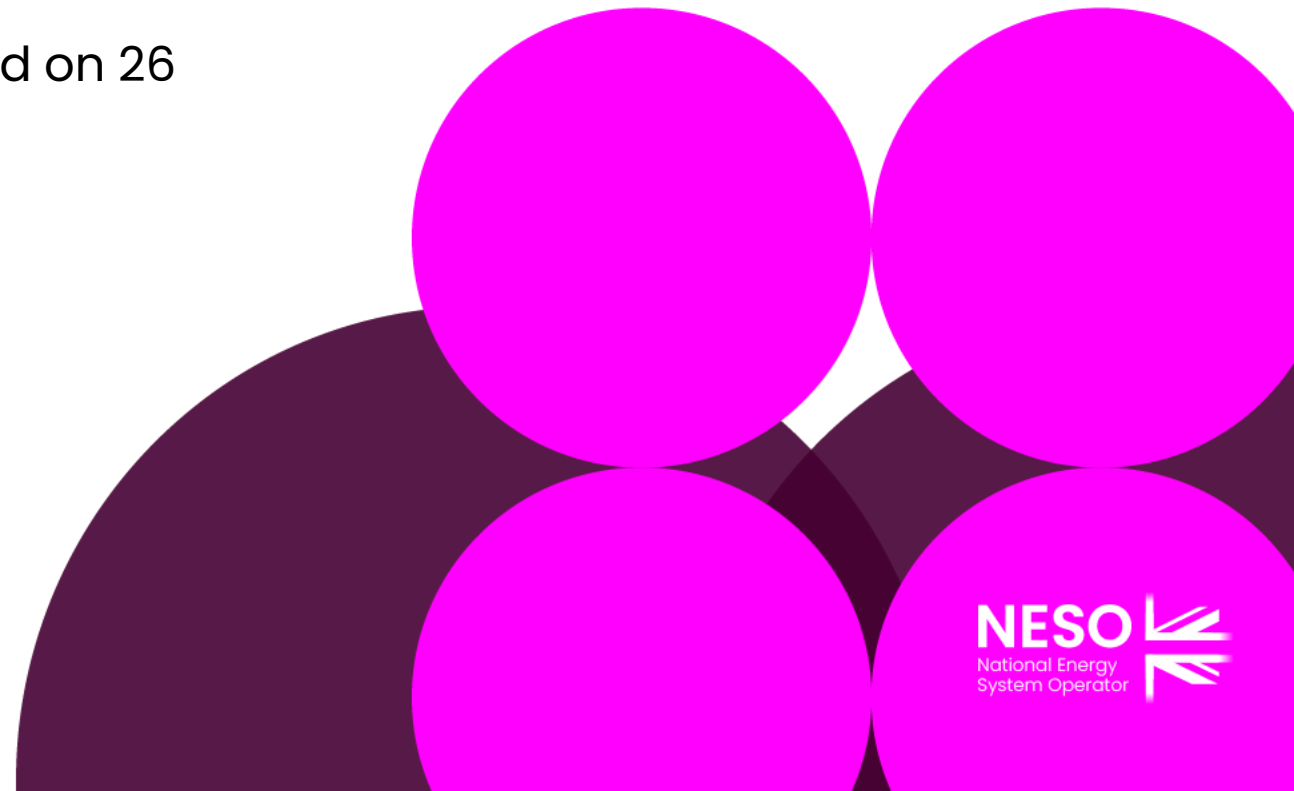
Duties of Panel Members & Alternates (GR.3.3)

1. Shall act **impartially** and in accordance with the requirements of the **Grid Code**; and
2. Shall not have any **conflicts of interest**.

Shall not be representative of, and shall act without undue regard to the particular interests of the persons or body of persons by whom he/she was appointed as Panel Member and any Related Person from time to time.

Approval of Panel Minutes

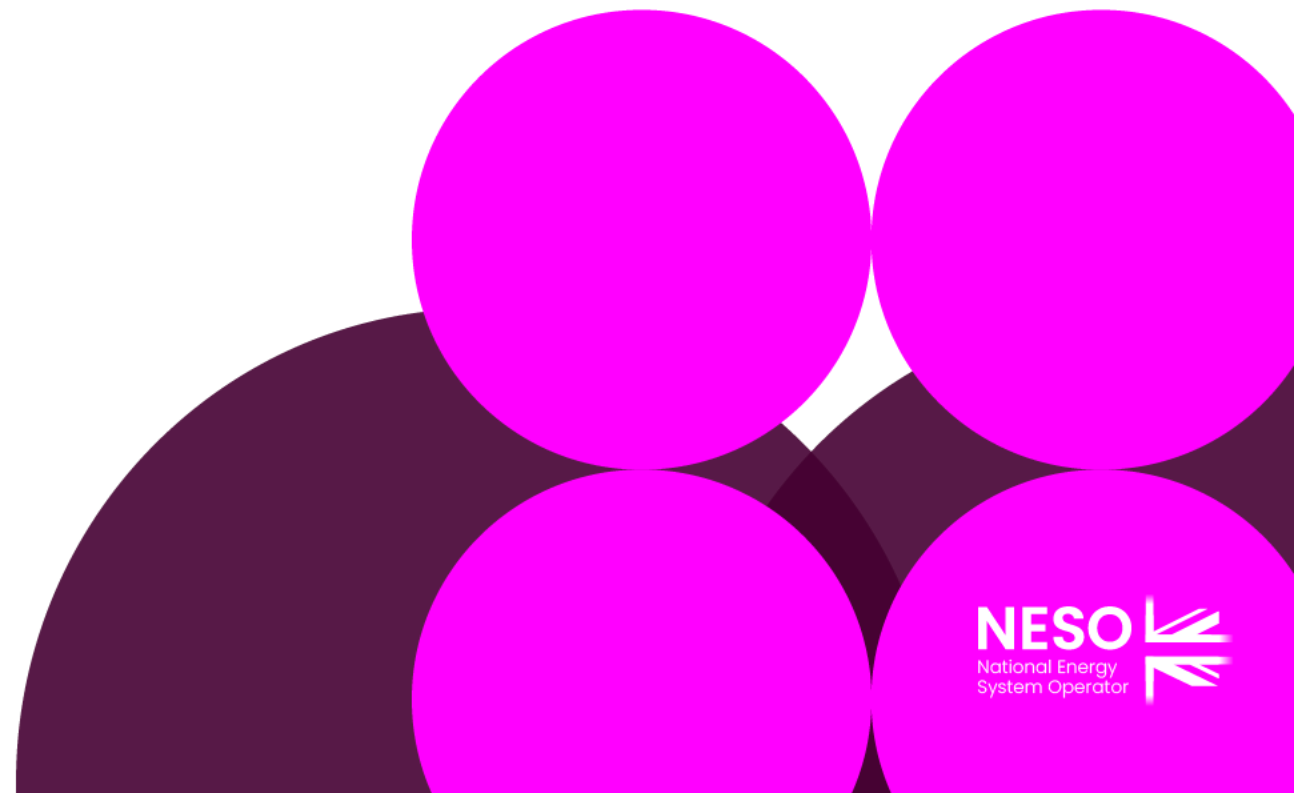
Approval of Panel Minutes from the meeting held on 26 March 2026.



Action Log

Action No.	Status	Action	Owner	Comments and Updates
456	Open	Ofgem Energy Code Reform (ECR) team to be invited to a future Grid Code Review Panel to provide update around milestones	GS/SC	The Ofgem ECR team may be invited to a future Grid Code Review Panel meeting to address specific questions or provide clarification, rather than a general milestone update.
465	Open	To provide a general update at a future Panel on the wider work going on in relation to Bilateral Embedded Generation Agreements (BEGAs)	CN	CN advised at the February Panel that NESO work is ongoing, but that the relevant teams are not yet in a position to share further detail.
484	Open	Baseline table errors to be fixed by a housekeeping modification first, rather than as part of GC0103.	AJ	The Panel agreed to leave the action open until the housekeeping modification is formally brought to Panel.
485	Open	Code Governance to provide some clarity on GC0178 and GC0155 timelines, resourcing and Workgroup scheduling to ensure momentum and avoid repeated delays.	KH	Timeline update for GC0178 will be provided post-procurement as requested by the Panel. There is currently no update on GC0155 as the Chair has noted the existing timeline may still be achievable.
486	Open	Code Governance to develop and bring back a revised/prototype Horizon Scan (broader than cross-code only, high-level, with indicative status/timing) for Panel feedback at a future meeting.	KH/SW	Update to be provided in May alongside the horizon scan

Chair's Update



Authority Decisions and Update (as of 15 April 2026)

Decisions Pending

Modification	Final Modification Report Received	Expected Decision Date
<u>GC0169: Material changes arising from Grid Code Modification GC0136</u>	07 October 2025	20 April 2026 (Previously 31 March 2026)
<u>GC0173: Consistency of Technical and Compliance Requirements between GB and European Users</u>	10 December 2025	20 April 2026 (Previously 31 March 2026)
<u>GC0179: Removal of Balancing Code No.4 from the Grid Code</u>	11 March 2026	TBC
<u>GC0139: Enhanced Planning-Data Exchange to Facilitate Whole System Planning</u>	06 April 2026	TBC

The Authority's publication on decisions can be found on their website below:

<https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable>

Grid Code Development Forum – Update

The GCDF meeting scheduled for 01 April was cancelled.

Next GCDF will take place on Wednesday 06 May

Deadline for May Agenda items – 24 April

Final Agenda items tbc, currently have one item which is "PPM guidance note – update and request for feedback"

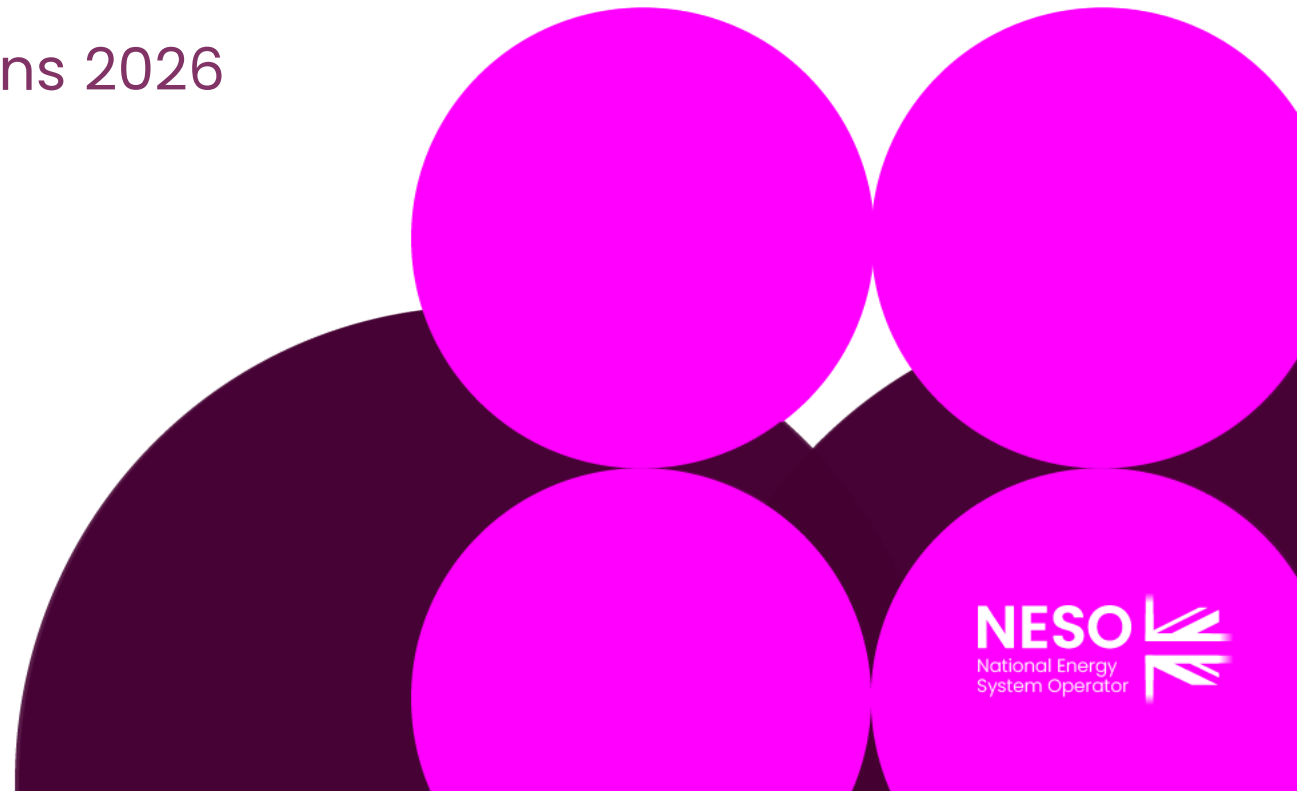
New Modifications

- GC0187: Grid Code Legal Text Corrections 2026
- GC0188: Update for Centralised Strategic Network Plan

New Modification

GC0187: Grid Code Legal Text Corrections 2026

Amanda Rooney, NESO



GC0187 Critical Friend Feedback

Code Administrator comments	Amendments made by the Proposer
Formatting and confirmation of regulated sections of the Grid Code	Proposer accepted all amendments made by the Code Administrator

The Issue

- A number of small errors have been detected in the Grid Code
- This modification corrects a large number of them

The Proposal

Proposed Solution:

- This modification proposes to update all small changes
- A full list is in the Annex, and later in this pack
- After a question last month, 2 changes have been dropped from the proposal

Alternative Option considered:

- The only possible alternative is to continue to leave the errors within the code, as they are small and obvious
- All changes included in this modification had simple, single solutions

Legal text

Proposed legal text changes:

1) OC2 Operational Planning and Data Provision

Section	Correction
OC2.4.1.3.2 (d)	Cross reference error, change to "OC2.4.1.2.2 (iii) and (iv)"
OC2.4.2.1	"Statement of Readiness" replaced with "Statement of Readiness" (all bold)

2) ECP.A European Compliance Processes

Section	Correction
3.5.1 (ii)	Typo error in table number, Replace table 1 with table A.3.5.1

3) BC1 Pre Gate Closure

Section	Correction
Between BC1.4.2(e) and BC1.4.2(f)	Spacing error. Remove extra line
Page 9, BC1.5	Spacing issue, space removed
Page 10-	Spacing issue, space removed

Legal text

Proposed legal text changes:

4) BC2 Post Gate Closure Process

Section	Correction
BC2.6.2	Spacing issue, space removed
Between BC2.6.5 and BC2.7	Spacing issue, space removed
Between BC2.9.3.3 and BC2.9.4	Spacing issue, space removed
Between BC2.9.6 and BC2.9.7	Spacing issue, space removed
Between BC2.9.7.2 and BC2.9.7.3	Spacing issue, space removed
Between BC2.6.5 and BC2.7	Spacing issue, space removed
BC2.5.4	Replace word "doesn't" with "does not"

5) (ECC) European Connection Conditions

Section	Correction
Title	Remove extra 'F'
Throughout	Replace 'license' with 'licence'
ECC.6.3.15.10 (vi)	Spacing issue, text "Voltage as measured at the.... for more than 1 second." To be moved up into list
6.2.1.2 (a)	Remove "as" in last line. Typo

Legal text

6) (GD) Glossary and Definitions

Section	Correction
"Fast Fault Current" and "Fast Fault Interruption Time"	Duplication in list removed
"Re-synchronisation"	Spacing issue, space removed
"Demand Facility"	Replace word "no" with "not"

7) (OC5) Testing and Monitoring

Section	Correction
OC5.A.2.8.6, OC5.A.3.6.6, OC5.A.4.5.6	"Maximum Export Limit" Removed bold format as this is not a defined term

8) (OC6B) Embedded Generation Control

Section	Correction
OC6B.1.1 to OC6B.3.2.2	Indents corrected to match page
OC6B.6, Page 5	Spacing issue, reduce spacing
OC6B.3.2.5	Spacing issue, reduce spacing

Legal text

Proposed legal text changes:

9) (CC) Connection Conditions

Section	Correction
6.2.1.2	" Plant and Apparatus " changed to " Plant and Apparatus " as separate defined terms
6.2.1.2 (a)	Remove "as" in last line. Typo

10) (GR) Governance Rules

Section	Correction
GR.3.3	Change reference "GR.3.1" to "GR.4.2"
Table 2 of GR. B	In respect of Restoration Services Change "OC.9.2.5" to "OC9.2.6"

Legal text

Proposed legal text changes:

11) (DRC) Data Registration Code

Section	Correction
Definition	" Primary Voltage System " changed to " Primary Voltage System " as it is not a defined term, but is in a table

12) (GC) General Conditions

Section	Correction
5.1	Removal of second "the"
5.2	Removal of second "the"

13) (CP) Compliance Processes

Section	Correction
CP8	Replace "COMPLIANCE REPEAT PLAN" with "Compliance Report Plan"

Governance

Proposed Governance Route:

- The Proposer had requested Fast track Self Governance for this modification. Under GR.15.4, the Proposer is required to provide a view on whether or not (and to the extent) that the Grid Code Modification Proposal constitutes an amendment to the Regulated Sections of the Grid Code
- The Proposer notes that whilst regulated sections are impacted, the changes do not constitute an 'Amendment' to the sections as the changes are very minor and do not impact Users

Consideration for Fast-Track:

- We believe this meets the criteria, containing typographical and cross-referencing details, as well as obvious mistakes such as spelling, spacing and duplication of words
- Full fast-track criteria on next slide

Grid Code Fast Track Criteria

Fast Track Criteria	<p>A proposed Grid Code Modification Proposal that, if implemented,</p> <ul style="list-style-type: none">(a) would meet the Self-Governance Criteria; and(b) is properly a housekeeping modification required as a result of some error or factual change, including but not limited to:<ul style="list-style-type: none">(i) updating names or addresses listed in the Grid Code;(ii) correcting any minor typographical errors;(iii) correcting formatting and consistency errors, such as paragraph numbering; or(iv) updating out of date references to other documents or paragraphs
----------------------------	--

Grid Code Self-Governance Criteria

Self-Governance Criteria	<p>A proposed Modification that, if implemented,</p> <ul style="list-style-type: none">(a) is unlikely to have a material effect on:<ul style="list-style-type: none">(i) existing or future electricity consumers; and(ii) competition in the generation, storage, distribution, or supply of electricity or any commercial activities connected with the generation, storage, distribution or supply of electricity; and(iii) the operation of the National Electricity Transmission System; and(iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and(v) the Grid Code's governance procedures or the Grid Code's modification procedures, and(b) is unlikely to discriminate between different classes of Users.(c) other than where the modification meets the Fast Track Criteria, will not constitute an amendment to the Regulated Sections of the Grid Code.
---------------------------------	--

GC0187 Asks of Panel

- **AGREE** that this Modification has a clearly defined defect, scope and solution
- **AGREE** that this Modification should follow Fast Track Self-Governance Criteria (Panel decision, which must be unanimous)
- **NOTE** the proposed timeline and that this Modification will be implemented upon conclusion of the Appeals window (if no objections are received from industry)

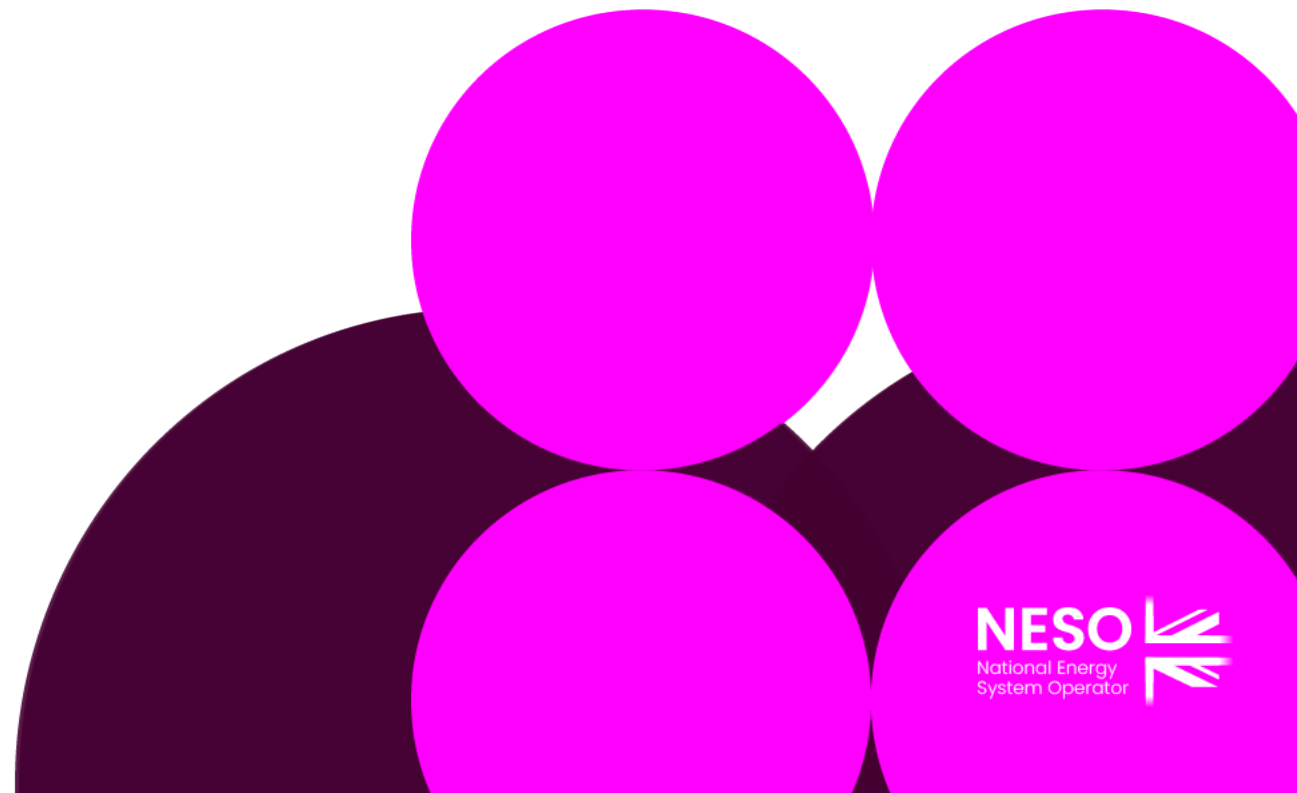
GC0187 Proposed Timeline

Milestone	Date
Panel decision <i>Unanimous Panel agreement is needed for this to be implemented; otherwise Panel will agree a different governance route</i>	23 April 2026
Appeals Window (15 Business Days)	27 April 2026 to 5pm on 20 May 2026
Implementation Date (5 Business Days after closure of Appeals Window if no Appeals received)	28 May 2026

New Modification

GC0188: Update for Centralised
Strategic Network Plan

Tom Goss, NESO



GC0188 Critical Friend Feedback

Code Administrator comments	Amendments made by the Proposer
<p>Re-wording and clarifying the issue</p> <p>Change explanation made clearer</p> <p>Suggested to make clearer the codes affected</p> <p>“We” removed, and “Proposer” suggested</p> <p>Clarified proposer’s justification for the self-governance route</p> <p>Acronyms expanded and added to acronyms table</p> <p>Added timeline details</p>	<p>Proposer agreed with suggested amendments.</p>

Public

Update Planning References in published Electricity Transmission codes

Proposal for removing
redundant references from
the Grid Code and STC/P

Situation:

Ofgem have confirmed the introduction of a new long-term planning framework, the Centralised Strategic Network Plan (CSNP). This will be covering the information currently given in the Electricity Ten Year Statement. (ETYS).

Therefore, we will need to remove references to ETYS and older statements, such as Seven Year Statement (SYS) and the Offshore Development Information Statement (ODIS) and replace with CSNP, wherever adequate.



What will we need to do?

- The ETYS is being phased out in 2026, and the data which is input, reports produced and other functions will be taken over by the new and broader CSNP.
- Therefore we need to ensure that the Grid Code, STC/P and others are amended in line with the new situation and do not have references to redundant processes which would cause confusion and uncertainty among stakeholders.
- The SYS and ODIS are already redundant at the time of writing so references to these also need to be removed from the Codes.
- Where the function of the ETYS is being taken over by the CSNP this will need to be added into the legal text. A list of Grid Code references to ETYS and SYS has been compiled and there will be potentially three scenarios:

Impact of the Modification -Users

This modification will impact any current users of ETYS. The next iteration of the report (summer 2026) will be the final one, and the license has already been updated regarding the requirements for CSNP.

The direct impact will be on the name of, and location of the data they are submitting



The data which stakeholders currently submit is governed by the Data Registration Code (DRC), and this will continue through to CSNP.

There will therefore be no changes to the data submission process for stakeholders.

Impact of the Modification – NESO

NESO will still be publishing most of the same data via CSNP. By ensuring that the references in the Grid Code as well as CUSC and STC/P are up to date and redundancy is removed, we are ensuring continuity and facilitating more effective future planning operations.

For example, the current Week 24, 28 and 42 submissions will continue under CSNP.



CSNP is not a replacement for ETYS but rather a new whole-system plan with a much broader view than any singular report.

The CSNP will serve as a network blueprint for the country, mapping demand and optimal locations for onshore and offshore transmission infrastructure to support a decarbonised energy grid.

Process

- The legal texts have been reviewed and approved by the legal team. There will be no impact on anyone's charges, or connection date/process, as a result of this change proposal.
- Having considered the required changes to the Legal text in the Grid Code, most of which are a straightforward change from ETYS to CSNP, we do not consider there to be a need for discussion prior to the Consultation therefore suggest that we approve a process whereby the modification goes to code administrator consultation (CAC). The suggested implementation date will be 31st August 2026.
- We have assessed the materiality of the proposed change; it is unlikely to have a material impact on the Users, as the results of the proposed change will be updating the references relevant to changing from the ETYS process to CSNP.
- Due to proposed changes to the DRC, this modification will be treated as a Standard Governance Modification to proceed to Code Administrator Consultation.
- Our communications with stakeholders during the CSNP proposal phase and also feedback regarding the required changes as a result of the implementation indicate that the overall premise and goals of the modification are understood and accepted
- The changes to the Data Registration Code (DRC) are solely to update the references from ETYS to CSNP

Planning References Update – Criticality of Issue

Impact of leaving the Grid Code un-altered: if the Planning References in the Electricity Transmission Codes such as the STC/P are not updated to meet the new situation:

- **Ambiguity over License obligations for Users:**

Assuming that the changes are not made before the implementation of CSNP, there will be ambiguity within the Codes concerning what information Users are required to submit. Whilst some new sections regarding the CSNP will be implemented there will be many references which are relevant to CSNP but mention ETYS or one of the other outdated programs.

- **Impediments to CSNP Implementation:**

The proposed changes are needed to be put into place to establish the process for CSNP and permit the necessary data exchanges. Failure to make the necessary changes to STC and the STCPs could block the production of CSNP, impede the funding of critical network infrastructure, and stop the parties satisfying their license obligations

- **Code untidiness**

NESO has sometimes been criticised for maintaining irrelevant references and sections in the Codes – given that the changes requested in the modification are directly relevant to a change we have a chance to ensure that the STC is correctly guiding users in accordance with current methodology rather than retaining links and references to old systems and programs.

Likely Changes of ETYS References:

- References to ETYS/SYS where the function as described in the Code section is being taken over in its entirety by the CSNP, and the reference can therefore simply be replaced by reference either to CSNP, or where appropriate a more generic reference to NESO published planning data (may aid in future-proofing). We anticipate that the majority of cases will fit into this category.
- References to ETYS/SYS where part of the function as described in the Code section is being taken over by the CSNP but not all. The Code section will need to be amended to ensure that the new reference to CSNP is correctly describing the functions it will fulfil, and any others are either removed or also amended so that the function and how they are being fulfilled.
- References to ETYS/SYS where the function is either completely redundant or is only a description or confirmation of the ETYS/SYS. For example, this would include mentions in a definitions section, or a passage which is being removed from the Licence, and can safely be taken out of the Code without needing further modifications

Affected Grid Code Sections:

- Planning Code (PC) 4.1,
- PC.4.3.1, PC.5.4 (a),
- PC.5.4 (f),
- PC.A.4.4,
- CC.6.2.1.2 [e],
- CC.6.2.1.2(f),
- ECC.6.3.15.8(v),
- DRC page 62
- Glossary & Definitions (adding new/removing the old references)



Other Considerations

STC/P Modification:

There will also need to be an STC/P Modification raised for the same issue

CUSC Modification:

There is also a modification running concurrently for CUSC.

This is expected to be the main part of the work, with more changes, and more significant ones.

Any questions around
this proposal?

GC0188 Proposed Timeline

Milestone	Date
Modification presented to Panel	23 April 2026
Code Administrator Consultation	30 April 2026 to 02 June 2026
Draft Final Modification Report issued to Panel (5 Business Days)	17 June 2026
Panel undertake Draft Final Modification Report recommendation vote	25 June 2026
Final Modification Report issued to Panel to check votes recorded correctly	29 June 2026 to 06 July 2026
Final Modification Report issued to Ofgem	13 July 2026
Ofgem decision	TBC
Implementation Date	10 Business Days following decision

GC0188 Asks of the Panel

- **AGREE** that this Modification has a clearly defined defect, scope and solution
- **AGREE** that this Modification should follow Standard Governance (Ofgem decision) rather than the Self-Governance Criteria (Panel decision)
- **AGREE** that this Modification should proceed to Code Administrator Consultation
- **NOTE** that there does appear to be an impact on the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code
- **NOTE** the proposed timeline

GC0176: Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code – Timeline Update

	Workgroup Report issued to Panel	DFMR issued to Panel	FMR issued to Ofgem	Decision Date	Implementation Date
Previous timeline	19 November 2025	18 February 2026	11 March 2026	TBD	10 Business Days after decision
New timeline	N/A	11 May 2026	TBD	TBD	10 Business Days after decision

Rationale: DFMR withdrawn prior to March GCRP, following receipt of D Code Consultation response with a material affect on Legal Text definition of 'Load Block'. Proposer states that while the D Code response is material and could affect the definition of 'Load Block', the required Legal Text change is minor, and the original intent of the Legal Text remains. The Workgroup will be reconvened and if members unanimously agree, the Code Administrator will make the appropriate change and the DFMR will be resubmitted for a Panel vote at the May GCRP. If Workgroup members do not unanimously agree a further CAC will be required.

Workgroups Remaining: 1

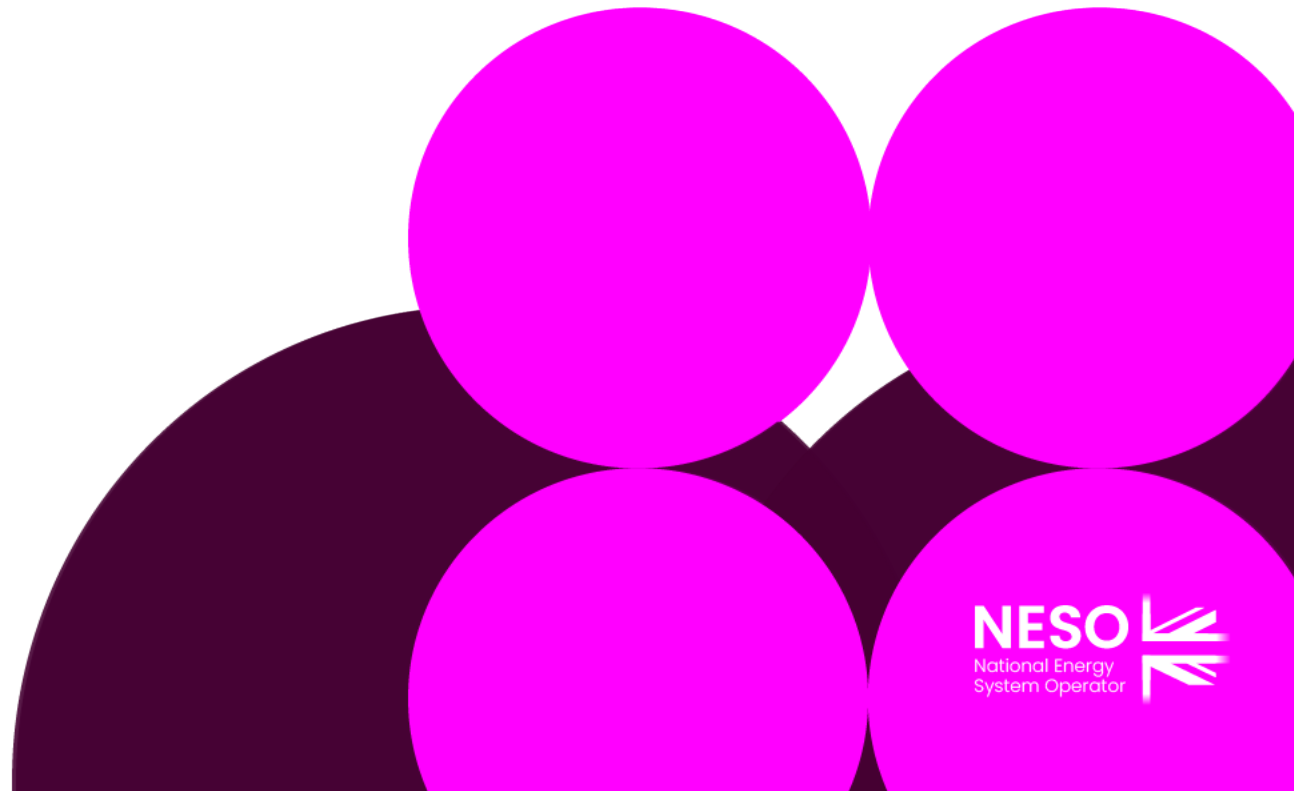
GC0176 – the asks of Panel

- **DIRECT** the Workgroup to review changes under GR.22.4(ii)
- **AGREE** revised timeline

Workgroup Report

GC0168: Submission of Electro
Magnetic Transient (EMT) Models

Kat Higby (Workgroup Chair)



Key points to note

The Grid Code Review Panel initially reviewed the GC0168 Workgroup Report in June 2025.

The Panel referred the modification back to the Workgroup for further discussions and clarification on:

- Cost recovery, including a possible link to CUSC modifications CMP456 and CMP466
- Legal text amendments and clarifications, including clarification on the interaction with the electrical standards and correction of grammatical errors
- Reference to DCUSA within the interactions section of the modification
- Possible derogation route – what happens if a model is not available and cannot be obtained or cannot be obtained within the timescales given

The Workgroup met 5 times to address the Panel feedback

Full Workgroup discussions around these feedback points can be found in pages 16–23 of the Workgroup Report

Key amendments following the Panel send back

Cost recovery: The Workgroup has undertaken further detailed consideration of cost recovery and its interaction with the CUSC, developing WAGCMI, which protects GB Code Users from retrospective cost exposure through a deferred effective date linked to the implementation of CMP456 and CMP466

Legal text and Electrical Standard: The legal text has been reviewed, corrected and clarified, including clarification of how the Grid Code requirements interact with and are supported by the proposed EMT Electrical Standard

DCUSA interactions: Interactions with DCUSA have now been explicitly captured within the report, with confirmed engagement with the DCUSA Administrator and clear recognition of impacts for embedded plant, including LEEMPS.

Flexibility: The Workgroup has clarified the approach where EMT models cannot be provided or meet required timescales within PC.A.9.2.2, supported by explicit “unless otherwise agreed” wording and additional guidance in the Electrical Standard.

Solutions and Workgroup Vote

Solution/summary of solutions:

- Requires certain Users with legacy plant to provide EMT models to NESO retrospectively when requested, supported by a new EMT Electrical Standard setting out technical requirements and submission processes. The solution does not include a link to cost recovery arrangements.
- Introduces a deferred effective date for GB Code Users, allowing immediate effect of GC0168 for EU Code Users but delaying applicability to GB Code Users until cost recovery is in place within the CUSC.

Summary of Workgroup Vote:

- The Workgroup concluded by majority that WAGCM1 better facilitated the Applicable Objectives than the Baseline.
- The Workgroup did not agree by majority that the original solution better facilitated the Applicable Objectives than the Baseline.

Terms of Reference

The Workgroup conclude that they have met their Terms of Reference, and the references can be located below:

Workgroup Term of Reference	Location in Workgroup Report
a. Implementation and costs;	Pages 9, 10, 14, 17, 18
b. Review draft legal text;	Pages 8, 10, 18–21
c. Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report; and	Page 10
d. Consider EBR implications	Page 10
e. Consider a cost recovery mechanism to receive the model data required to share with a CUSC Workgroup.	Page 10, 14, 17, 18
f. Consider the use/introduction into the Legal Text of generator classification types C, D as opposed to Medium and Large.	Page 11

Terms of Reference

The Workgroup conclude that they have met their Terms of Reference, and the references can be located below:

Workgroup Term of Reference	Location in Workgroup Report
g. Consider approach on collecting models and reference to published guidance/phased application of approach.	Pages 11, 21
h. Consider codifying the list of Users who are required to submit EMT models.	Page 11, Annex 4
i. Consider the scenario where a User is unable to provide an EMT model.	Page 12, 23
j. Consider whether there is a need for any consequential changes to the Distribution Code and / or Distribution Connection Use of System Agreement (DCUSA).	Page 12, 23
k. Consider whether there is a need to obtain EMT models from medium power stations embedded in distribution networks and, if so, the mechanism for engaging with the host DNO and the Generator and the process to be followed in the event that the Generator is unable to provide the EMT models or would incur significant costs in doing so.	Page 12

Terms of Reference

The Workgroup conclude that they have met their Terms of Reference, and the references can be located below:

Workgroup Term of Reference	Location in Workgroup Report
I. Consider if we are reflecting international practice including observation of the modelling developments proposed for RfG 2.0 and HVDC 2.0	Page 13

GC0168 Asks of Panel

- **AGREE** that the Workgroup have met their Terms of Reference
- **AGREE** that this Modification can proceed to Code Administrator Consultation
- **NOTE** that this Modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code
- **NOTE** the ongoing timeline

GC0168 Next Steps

Milestone	Date
Code Administrator Consultation	04 May 2026 to 5pm on 04 June 2026
Draft Final Modification Report issued to Panel	17 June 2026
Draft Final Modification Report presented to Panel	25 June 2026
Final Modification Report issued to Panel to check votes recorded correctly (5 Business Days)	02 July 2026
Submission of Final Modification Report to Ofgem	16 July 2026
Ofgem decision date	TBC
Implementation Date	10 Business Days after Authority Decision

Electrical Standard – Electromagnetic Transient (EMT) Model Requirements and the Approach & Process for Retrospective Submission (GC0168)

Milestone	Date
EMT Model Requirements and the Approach & Process for Retrospective Submission presented to Panel	23 April 2026
Panel Review (20 Business Days)	23 April 2026 to 22 May 2026
Implementation Date (if no comments received)	12 June 2026

Electrical Standards – the asks of Panel

- **FEEDBACK** any comments before 5pm on 22 May 2026

Electrical Standard – Transmission Owners

Applicable Electrical Standard (GC0103)

Milestone	Date
Transmission Owners Applicable Electrical Standard presented to Panel	23 April 2026
Panel Review (20 Business Days)	23 April 2026 to 22 May 2026
Implementation Date (if no comments received)	12 June 2026

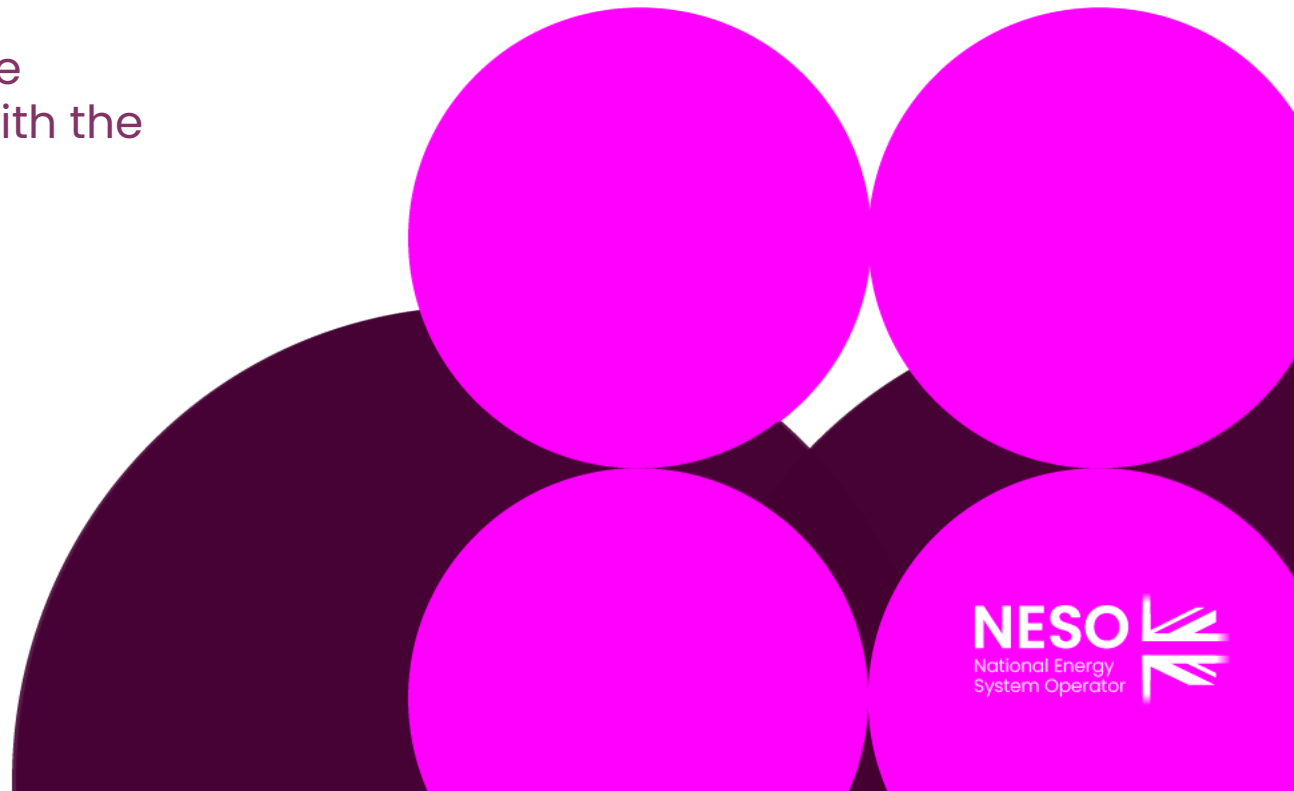
Electrical Standards – the asks of Panel

- **FEEDBACK** any comments before 5pm on 22 May 2026

Draft Final Modification Report

GC0103: The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Codes

Kat Higby (Panel Secretary)



Solution and Workgroup Vote

Solution:

- To set out within the Grid Code the harmonisation requirement in the European Union (EU) Grid Connection Codes as they relate to Electrical Standards.

Summary of Workgroup Vote:

- The Workgroup concluded by majority (7 out of 8 votes) that the original better facilitated the Applicable Objectives than the Baseline.

Code Administrator Consultation Responses

Summary of Code Administrator Consultation Responses:

Code Administrator Consultation was run from 03/12/2025 to 12/01/2026 and received 4 non-confidential responses [and 0 confidential responses]. Key points were:

- One respondent stated the proposal creates a level playing field whilst another felt it would facilitate a more consistent and efficient connections.
- Three respondents supported the implementation approach. One felt the implantation period of 10 Business was too short and suggested 90 calendar days would be more appropriate.
- One respondent provided several suggestions to the Applicable Electrical Standard in Annex 03 which have been forwarded to the Transmission Owners developing the document.
- One respondent proposed small number of minor editorial comments and suggestions to the following GC0103 legal text documents.

GC0103 Asks of Panel

- **NOTE** that this Modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code
- **VOTE** whether or not to recommend implementation
- **NOTE** next steps

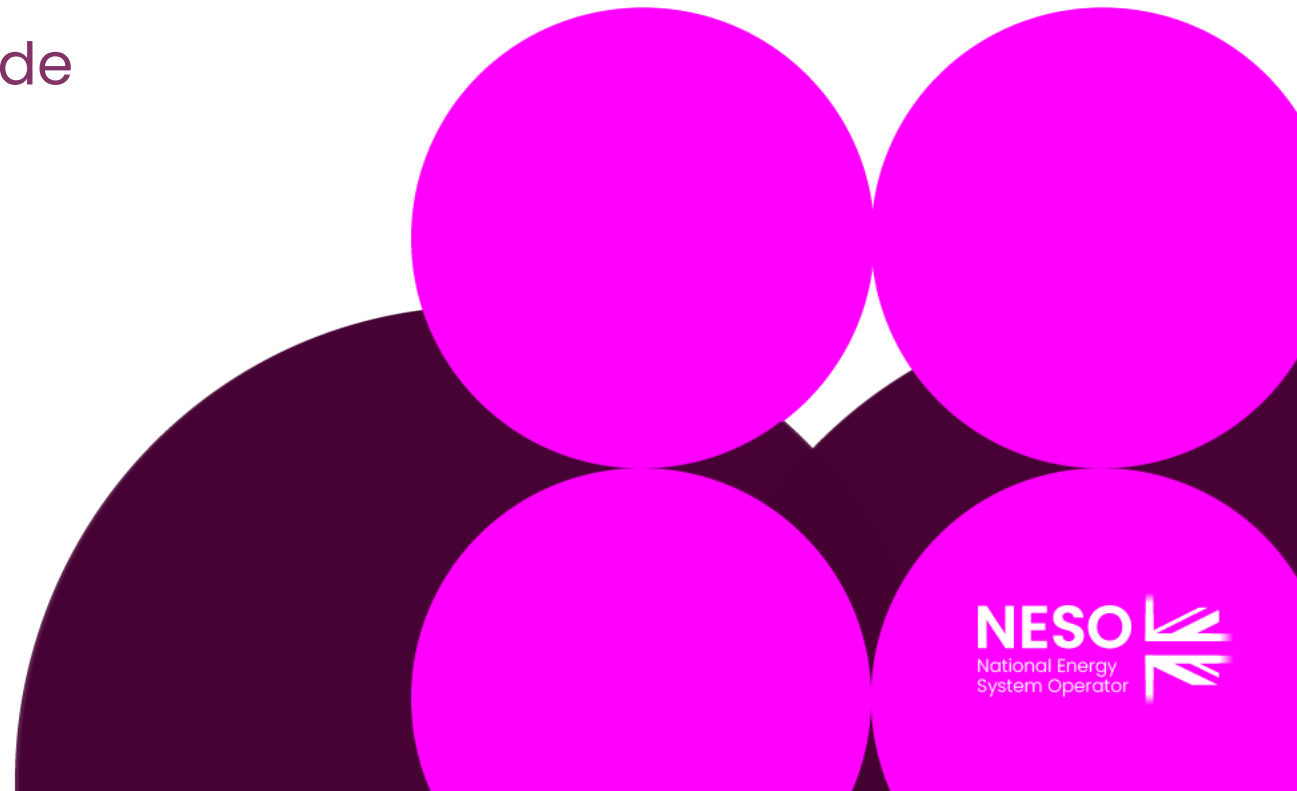
GC0103 Next Steps

Milestone	Date
Final Modification Report issued to Panel to check votes recorded correctly (5 Business Days)	30 April 2026 to 07 May 2026
Submission of Final Modification Report to Ofgem	14 May 2026
Ofgem decision date	TBC
Implementation Date	10 Business Days after Authority Decision

Second Draft Final Modification Report

GC0164: Simplification of Operating Code
No.2

Kat Higby (Panel Secretary)



Solution

Solution/summary of solutions:

- This Modification seeks to simplify the text in Operating Code 2 (OC2) within the Grid Code to help Users identify and understand the obligations placed upon them.
- This is the first modification resulting from the Alignment, Simplification and Rationalisation Workstream (ASRW) of the Digitalised Whole System Technical Code project.
- As well as the changes to OC2, there are additional legal text changes within the Glossary and Definitions and Planning Code. Paragraph references to OC2 have also been updated within Operating Code 5, European Compliance Processes, Balancing Codes 1 and 2, General Conditions and Data Registration Code.

Second Code Administrator Consultation Responses

Summary of Code Administrator Consultation Responses:

Code Administrator Consultation was run from 17/02/2026 to 27/03/2026 and received 1 non-confidential response and 0 confidential responses.

Key points were:

- The respondent views the Proposal positively and its aim to make the Grid Code more efficient and user friendly.
- They also support the proposal implementation approach.

GC0164 Asks of Panel

- **NOTE** that this Modification does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?
- This impact has been addressed previously and is noted in the Draft Final Modification Report
- **VOTE** whether or not to recommend implementation
- **NOTE** next steps

GC0164 Next Steps

Milestone	Date
Final Modification Report issued to Panel to check votes recorded correctly (5 business days)	24 April 2026 to 01 May 2026
Submission of Final Modification Report to Ofgem	05 May 2026
Ofgem decision date	TBC
Implementation Date	TBC

EBR Article 3 Objectives

For reference, the Electricity Balancing Regulation (EBR) Article 3 (Objectives and regulator aspects) are:

This Regulations aims at:

1. Fostering effective competition, non-discrimination and transparency in balancing markets;
2. enhancing efficiency of balancing as well as efficiency of national balancing markets;
3. integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;
4. contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;
5. ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;
6. facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;
7. facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.

Public

Prioritisation Stack

Modifications at Workgroup Stage

Mod Number	Previous Priority No:	Priority No	Title
GC0155	1	1	Clarification of Fault Ride Through Technical Requirements
GC0178	3	2	Temporary Overvoltage - Specification of Limits and Clarification of Obligations
GC0186	4	3	Proposed Grid Code Changes - Post Electricity System Restoration Standard (ESRS)
GC0117	5	4	Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements
GC0182	6	5	Standardisation of Power Flow Metering Polarity
GC0168	7	6	Submission of Electro Magnetic Transient (EMT) Models
GC0164	8	7	Simplification of Operating Code No.2
GC0181	9	8	Enhance the Effectiveness of System Incidents Reporting
GC0140	10	9	Grid Code Sandbox: enabling derogation from certain obligations to support small-scale trials of innovative propositions

Modifications Post-Workgroup Stage

Mod Number	Previous Priority No:	Title
GC0139	1	Enhanced Planning Data Exchange to Facilitate Whole System Planning
GC0176	2	Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code
GC0103	10	The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Codes

Standing Items

Updates on all developments relevant to Grid Code Panel e.g. potential for future governance changes or modifications

- Distribution Code Panel update (Alan Creighton)
- JESG Update (information only)
 - Last meeting – 14 April 2026 was cancelled. (10 March 2026 [Meeting materials and Headline Report](#))
 - Next meeting – 12 May 2026

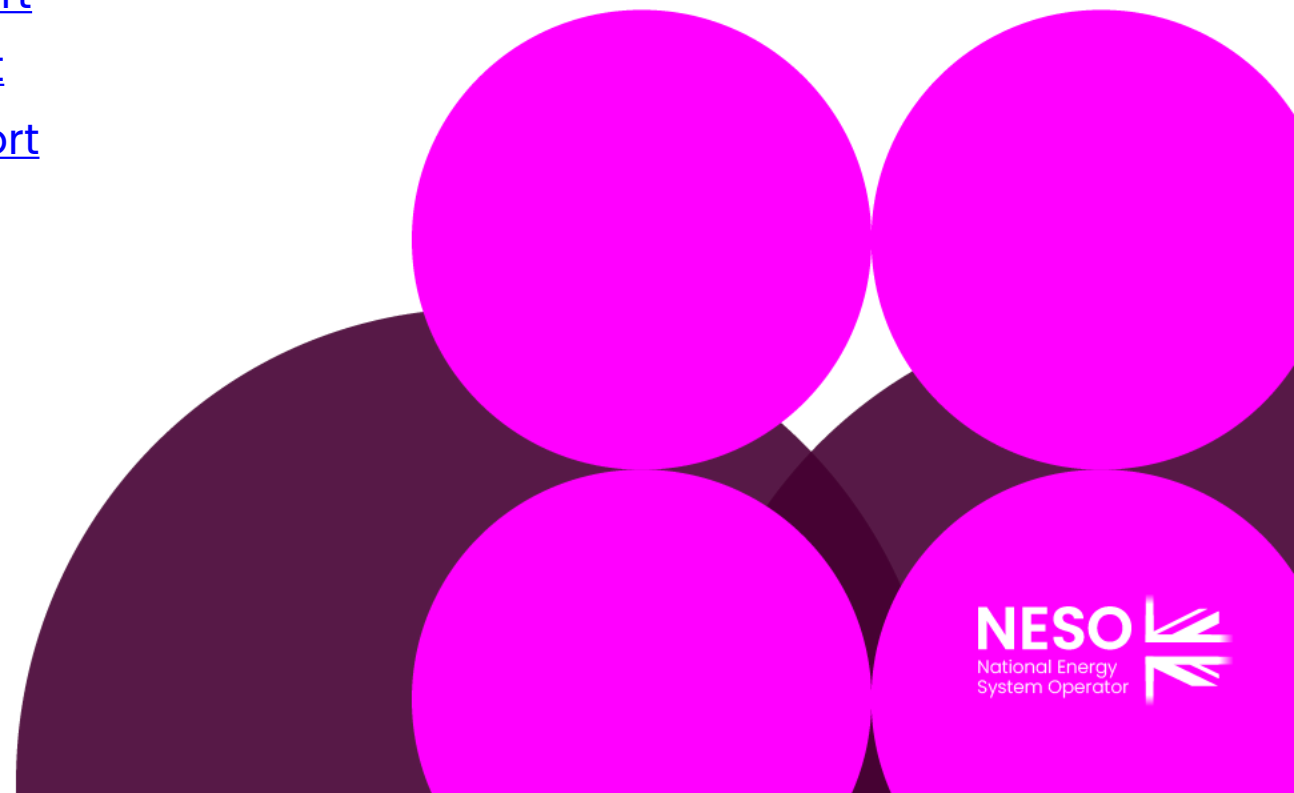
Updates on other industry codes

24 March 2026 SQSS [Panel Papers and Headline Report](#)

25 March 2026 STC [Panel Papers and Headline Report](#)

27 March 2026 CUSC [Panel Papers and Headline Report](#)

09 April 2026 BSC [Panel Papers and Headline Report](#)



Any other business

Ofgem Sandbox Update



Innovation Adaptability Mechanism in Codes

April 2026

Ofgem's Innovation Hub

- Ofgem's team **dedicated to supporting innovators and innovation** within the sector; established in 2016.
 - **Fast, Frank Feedback (FFF) - feedback service** launched to provide regulatory guidance to innovators looking to enter the energy sector with new propositions.
 - **Energy Regulation Sandbox (ERS)** – launched in early 2017, to **help innovators trial or launch** new propositions.

INNOVATION HUB in 2026

Guides

Feedback

Advice and guidance

Sandbox

Regulatory relief

Network Innovation Allowance

Strategic Innovation Fund

Networks funding

Insights

Future Regulation Sandbox (FRS)

Improving regulation

Problem statement:

- Our energy system is transforming as we transition to net zero → it's vital that industry codes can evolve to support this transition
- We are also transitioning to a more strategic energy system planning → wherever possible we must encourage industry to propose and adopt strategic change
- **Code change processes, and even existing sandboxes/ derogation mechanisms are not flexible enough to enable the adaptable regulatory system we envisage**

Vision:

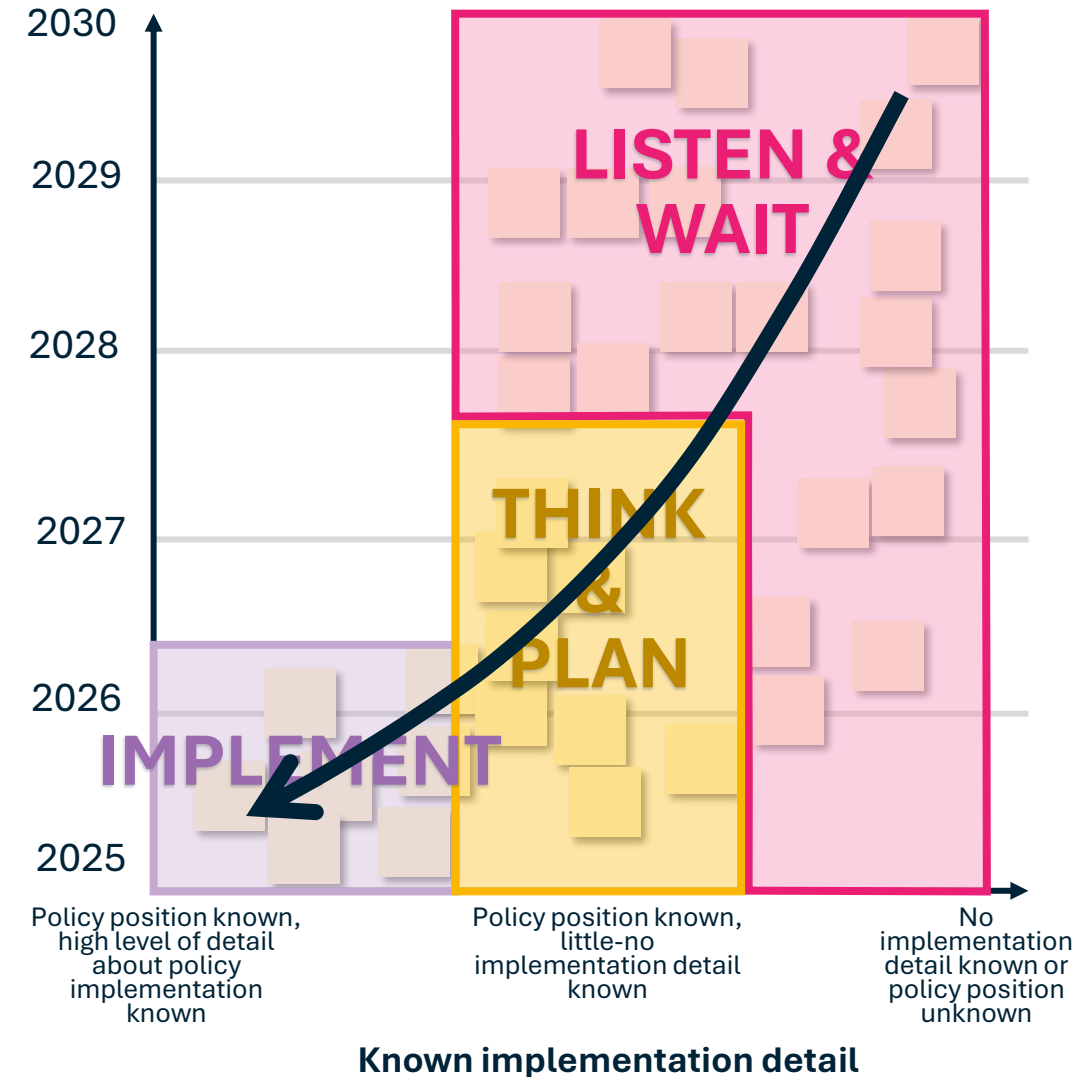
- Enable the swift development and implementation of innovation through *adaptability mechanisms*, which will allow the rules to adapt to a given innovation trial or market launch in a timely manner.

What could it look like?

- Codes have derogation powers / can run trials
- Codes and Ofgem collaborate on innovation and can run trials together
- Trials lead to swift code changes
- Individual as well as market wide derogations are available
- Coordination across codes
- Processes similar / same code to code

- Energy code reform is ongoing
- A **Strategic Direction Statement (SDS)** guides the work of Code Managers
- The SDS is an articulation to industry of how codes need to evolve to deliver government and Ofgem's strategic priorities
- The SDS signals our ambition **for all codes introduce mechanisms to facilitate trials and timely market entry of innovations**, including through derogations and trials of alternative rules
- We've asked that code administrators start thinking about **how their current toolbox facilitates innovation, how and when adaptability mechanisms could be introduced and what features they should have**

Implementation timeline, for mods to enable policy change



Our ask for the codes

1. Conduct review of available innovation support to identify:

- Existing derogation / innovation adaptability mechanisms
- How well are they used
- Missing elements
- If no existing mechanism, is there a need for one? (user need)
- Any barriers / reasons why tools such as derogations shouldn't be introduced?

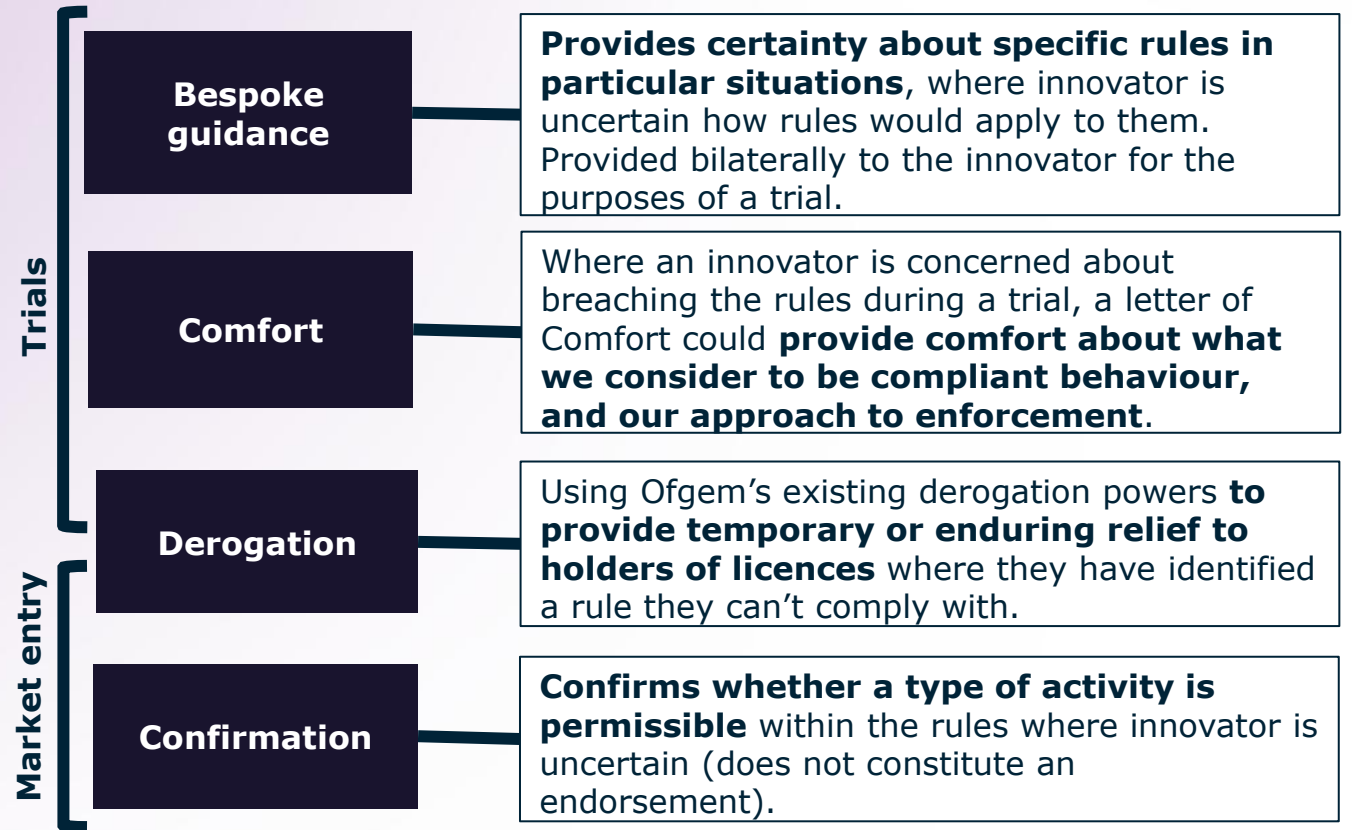
2. Design and introduce adaptability mechanisms:

- What should it look like?
- How can it be introduced?
- Who should be involved?
- What's Ofgem's role / what's the code administrator's role?

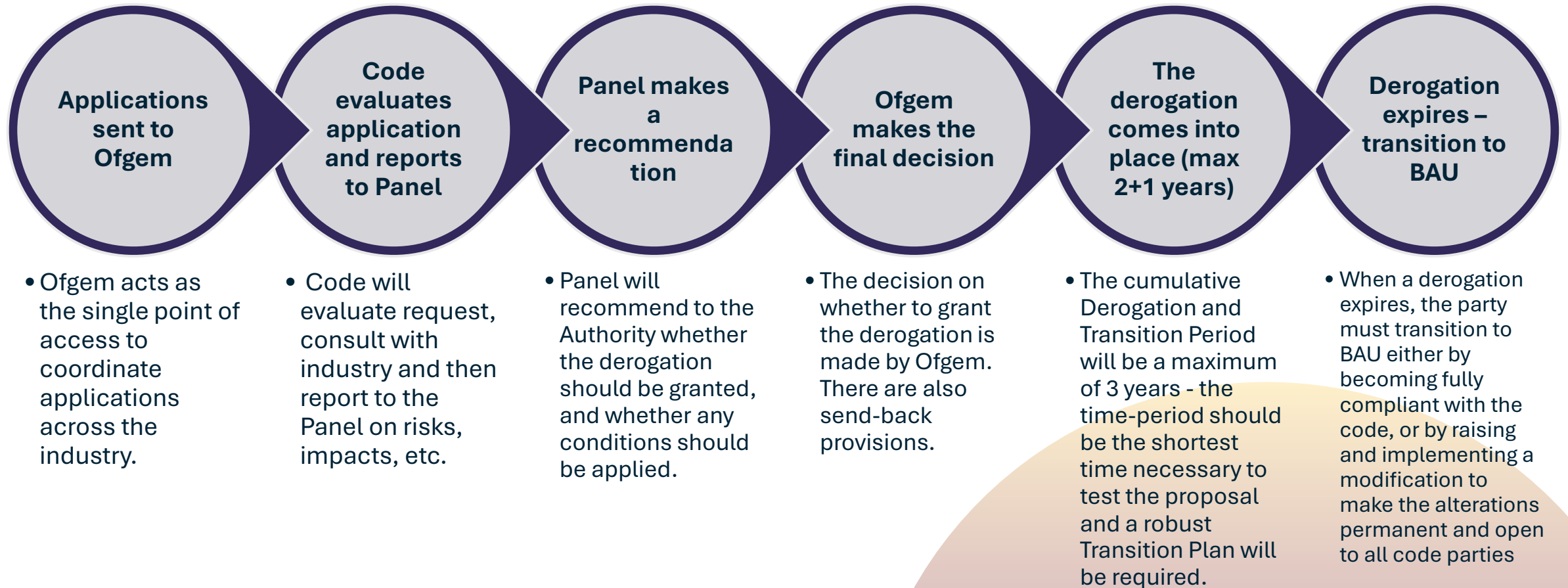
Ofgem's demand-led Sandbox

- Allows innovators **to trial or bring to market new propositions without the rules applying in the usual way.**
- Uses Ofgem's **existing derogation powers.**
- Can only give a **tweaked version** of current regime.
- **Not all regulations are in scope** (Ofgem must be responsible for the rules in questions and have the power to offer requested relief).
- Provides **temporary or enduring** support.
- Insights can be used to **inform policy, but** not a means to change regulation.
- Can offer **relief from rules in licences and industry codes** (BSC, DCUSA, REC).

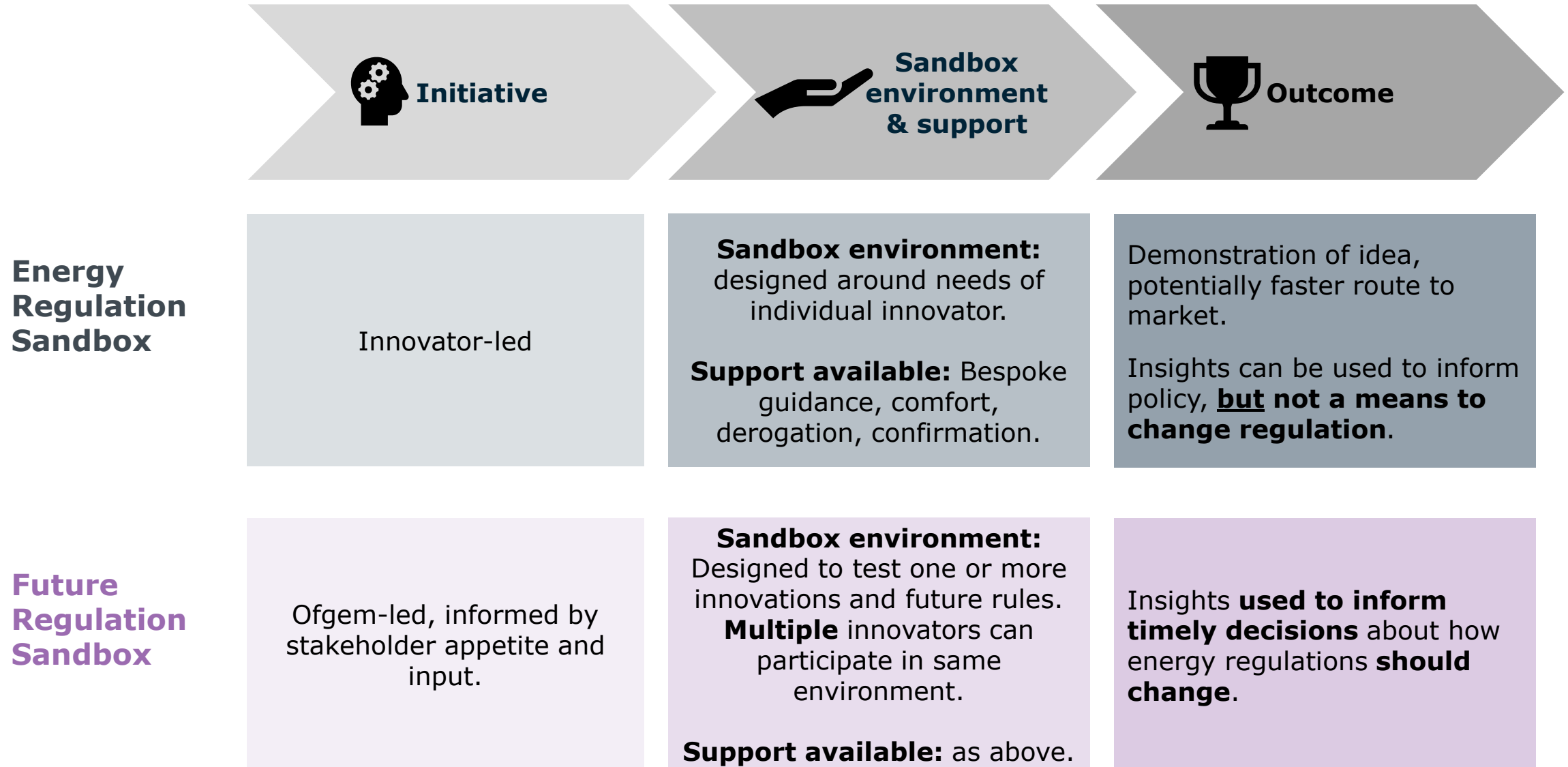
Sandbox tools



Current code Sandbox derogation process (BSC, DCUSA)



Policy-led Sandbox



Code Sandbox example: Emergent Energy

- Emergent works with social landlords to **develop microgrids** (exempt distribution networks) **in multiple occupancy buildings**.
- **The problem:** while residents on private networks **have a right to switch their energy supplier**, in practice, the rules around metering and settlement make them unattractive customers.

BSC Sandbox

- **Derogation from the BSC in 2022** to trial a new **supplier switching methodology** for customers on microgrids
- BSC rules required **complex bilateral agreements between suppliers to settle energy use on microgrids = locks supplier switching**
- **Emergent tested a new method using aggregated meter readings from on-site meters - enabling** multiple suppliers to serve customers on microgrids fairly and competitively.
- Trial led to BSC Modification P455, which was approved in September 2024, making the new methodology a permanent part of the BSC.

DCUSA Sandbox

- **DCUSA Sandbox granted in 2023** to address distribution-level regulatory barriers that affect microgrid operations.
- While the rules were in the licence, ElectraLink helped assess Sandbox request trial and navigate relevant regulations.
- BSC Sandbox tackled settlement and supplier switching at the market level - DCUSA Sandbox addresses distribution-level rules that affect how microgrids connect and operate.
- Extension to timelines granted end of 2024 – to allow Emergent to test the DCUSA solution alongside newly implemented BSC methodology.
- New completion date – March 2027.

Activities ahead of the next Panel Meeting

Grid Code Development Forum	06 May 2026
Modification Proposal Deadline for May Panel	01 May 2026
Papers Day	11 May 2026
Panel Meeting	19 May 2026 (Teams)

Close

Anthony Pygram

Acting Independent Chair, Grid
Code Review Panel