

Public

Code Administrator Meeting Summary

Workgroup Meeting 4: GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems

Date: 29 April 2026

Contact Details

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

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

Key areas of discussion

The Chair welcomed the Workgroup members and observers to Workgroup 4 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 May.

Action Log Review

Action 03: (Open) Clarification required on how “acceptable overloading” is interpreted and applied in practice (noted this action is linked to Action 14).

Action 11: (Closed) – Action has been addressed via revised legal text (delete 5.3/5.4 point that is now outdated).

Action 13: (Open) DN and CN addressed this action in Workgroup with discussions around “how and “what” and where these sit.

Action 14: (Open) Query and clarify “What vs How” and whether “unacceptable overload” is within or outside of scope.

Action 15 & Action 16: (Open) Presented by DN at Workgroup regarding “how” sits outside the SQSS and the high-level description to be included in an appendix.

Action 19: (Closed) Draft consultation and legal text has been circulated.

Action 20: (Closed) Timeline updated

Action 21: (Open) Action to be revisited.

Review Workgroup Consultation

The Workgroup reviewed the draft workgroup consultation report (and supporting outputs) to confirm that it accurately reflected the agreed proposal, captured key dependencies, and was ready to proceed to consultation.

Core framing (“what” vs “how”)

The Workgroup discussed and reaffirmed that the “*what*” (high-level requirements/intent) should be captured within box SQSS (supported by a high-level appendix), while the detailed “*how*”

Public

(implementation methodology, tools, templates, and operational detail) requires further development and governance through a separate, stakeholder-inclusive process.

Governance and assurance expectations

Workgroup discussions highlighted that any risk assessment route should be reserved for exceptional, non-business-as-usual circumstances, with clear eligibility screening, robust documentation, decision traceability, defined approval routes, and explicit conditions and time limits for any authorisation (including the ability to amend, suspend, or revoke where circumstances change).

Interfaces and consequential changes

The Workgroup noted that implementing the proposal would likely require aligned changes beyond SQSS. This may include Grid Code amendments (e.g., OC2) to enable information exchange/notifications and to clarify escalation and decision routes where agreement is not reached, as well as potential STCP updates to support initiation and interaction between NESO and TOs. A preference was expressed to present these changes to Ofgem as a coordinated package.

Reporting and transparency

The Workgroup discussed the value of periodic (e.g., annual) reporting on use of the process—including volume, approvals/rejections, and high-level outcomes—to support oversight and inform any future review. The Workgroup also noted the need to agree what information can be published (e.g., under NESO licence conditions) and what may require redaction or regulator-only handling.

Legal Text

The Proposer presented the revised legal text and a high-level appendix setting out the process at a principles/requirements level. The intent is that the detailed methodology (“how”) sits outside SQSS and is developed through a separate stakeholder process.

Status of earlier drafting points (5.3 / 5.4)

The Workgroup noted earlier discussions on whether to retain or delete points 5.3/5.4. The Proposer advised that actions relating to the *initial* legal text had been superseded by the revised draft and could therefore be closed, as the revised wording provides the required clarification.

Where the “how” would sit / governance route

The Workgroup discussed that the detailed process would be developed under the NESO licence condition / Network Access Planning framework, with planned workshops involving impacted stakeholders and appropriate reporting and oversight (e.g., annual reporting) to support review.

Risk assessment framework (high-level)

The Workgroup discussed that the legal text and appendix is intended to support a strictly limited, non-BAU risk-assessment route, with eligibility screening, robust documentation and traceability, mitigations, cost-benefit justification, and time-bounded authorisations (including the ability to amend, suspend, or revoke where assumptions change).

Consequential code changes flagged

Workgroup discussions highlighted that implementing the legal text would likely require:

- Grid Code OC2 updates to require/enable information exchange and notifications, and to clarify escalation/decision routes where agreement is not reached; and
- Potential STCP changes to enable initiation and interaction between NESO and TOs, with a preference to take this forward to Ofgem as a coordinated package.

Public

Several Workgroup members requested clearer definition of decision rights and escalation—for example, *who can object, whether any party has a veto, and what the escalation route is if agreement is not reached*—and suggested that this clarity should be reflected in OC2 and/or the “what” appendix.

Next Steps

Review and update the Workgroup Consultation Report to ensure the wording reflects the agreed scope and dependencies; incorporate panel-member feedback accurately (distinguishing individual views from the formal panel position); and progress the draft consultation, legal text and high-level appendix towards publication in line with the updated timeline.

Actions

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

Action Number Raised	Workgroup	Owner	Action	Due by	Status
22	WG 4	RW	Arrange Meeting with Proposer and follow-up on consequential modification timelines / packaging: understand when consequential mods (e.g., OC2 / SDCP) need to be raised and how timelines/panels align, to support submitting a coordinated package to Ofgem.	WG5	Open
23	WG4	ALL	To review Workgroup Consultation Report and give feedback/comments	COP 01.05.26	Open
24	WG4	DN	To review and update legal text comments and liaise with Legal department	WG5	Open

Attendees

Name	Initial	Company	Role
Lurrentia Walker	LW	NESO, Code Administrator	Chair
Kayte Stanton-Hughes	KSH	NESO, Code Administrator	Technical Secretary
Dozie Nnabuife	DN	NESO	Proposer

Public

Steve Baker	SB	NESO	NESO Rep
Alan Creighton	AC	Northern Powergrid	Workgroup Member (Alternative)
Amanda Rooney	AM	NESO	Observer
Andrew Urquart	AU	SSE Generation	Workgroup Member
Calum Watkins	CW	Ofgem	Authority Representative
Madhuria Chanda	MC	National Grid	Workgroup Member (Alternative)
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Maria Lopez	ML	NESO	Observer
Fraser Scott	FS	SSE	Workgroup Member
Roddy Wilson	RW		Workgroup Member
Shaun Pereira	SP	NESO	Observer
Thomas West	TW		Workgroup Member (Alternative)

Apologies

Name	Initial	Company	Role
Bukky Daniel	BD	EDF Power	Workgroup Member
Mark Bowker	MB	National Grid	Workgroup Member
Steve Quinn	SQ	NGED	Workgroup Member