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SQSS Code Review Panel

Date: 24/03/2026

Location: Microsoft Teams

Start: 14:00

End: 15:30

Participants

Attendee	Initials	Company
Jess Rivalland	JR	Chair
Karen Stanton-Hughes	KSH	Panel Technical Secretary
Antony Johnson	AJ	Panel Member, NESO Representative Alternate
Bieshoy Awad	BA	Panel Member, NESO Representative Alternate
Bless Kuri	BK	Panel Member, SHET Transmission Operator Representative Alternate
Calum 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
Roger Carter	RC	Panel Member, OFTO Representative

Observers / Presenters

Observers / Presenters	Initials	Company
Cathy Fraser	CF	NESO Representative – Presenter
Dozie Nnabuife	DN	NESO Proposer – Presenter
Ian Larsson	IL	NESO Representative – Observer
Maria Lopez	ML	NESO Representative – Observer
Mingyu Sun	MS	NESO Representative – Observer
Stuart McLarnon	SMC	NESO Representative – Presenter
Shaun Pereira	SP	NESO Representative – Presenter

Apologies

Attendee	Initials	Company
Alan Creighton	AC	Panel Member, Network Operator Representative

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1. Introductions and Apologies

The Chair welcomed Panel members and thanked them for attending the meeting. Apologies were received from Alan Creighton.

2. Minutes from previous meeting

The meeting minutes from the SQSS Panel held on 05 December 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. 05.12.25 Pending until GC0117 solution is approved/ rejected by Ofgem. AJ advised significant preparatory work has been completed, and the modification is still targeted for completion around August 2026. AJ acknowledged the CBA has been a little later starting that planned due to the high volume of Stakeholder comments received, however the official target at the time of the SQSS Panel is still August 2026.

Any approval of GC0117 will require consequential amendments to the definition of large power stations within the SQSS and is likely to give rise to further industry code modifications, including consideration of whether existing plant should be included retrospectively.

Action 42: (Open) Context is unclear. PD will follow up, and meeting minutes from September 2024 will be reviewed for background and clarification of ask.

Action 44: (Closed) This action is now complete, as representation has been secured on the workgroup. Although the underlying issue still requires attention, the original action can be closed.

Action 46: (Open) Evidence for FRCR has been submitted by the NESO FRCR team. CW will take ownership of this action going forward.

New Actions:

Action 48: All to review the updated GSR036 Proposal, legal text, case studies and provide comments by Friday 10 April, so that all comments can be addressed in the next submission.

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Action 49: SMC to organise and run an informal SQSS housekeeping / formatting workshop for GSR037 prior to modification going straight to CAC.

Action 50: CF to circulate Frequency Risk and Control Report (FRCR) 2025 supplementary evidence to SQSS Panel alongside Ofgem submission. NESO to prepare material for discussion on future FRCR governance and panel voting role at future SQSS meeting.

Action 51: Chair to schedule and run a special SQSS panel (late April) to review FRCR evidence and hold a formal Panel recommendation vote. As well as a review of the governance for FRCR.

4. Authority Decisions

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

GSR034 received Authority approval and has now been implemented into the SQSS. The modification has been published, and industry notification has been completed, marking the conclusion of this modification. A minor delay to publication was noted, but this did not impact completion of the implementation or communications to industry.

5. New modifications

GSR036: 'System Access Reform: Review of the voltage limits

This modification aims to review the voltage limits applicable to operational timescales and the potential for provision of some flexibility around them.

GSR036 was re-presented to the Panel with an updated Impact Assessment proposing the restoration of the 275 kV upper voltage limit from +9% to +10%. The Panel did not agree progression of the modification at this meeting. Instead, discussion focused on providing detailed feedback to support further development of the Proposal. Key areas of focus included alignment with Grid Code ECC 6.1.4 and relevant Internal Electricity Market (IEM) and European requirements, consideration of legal and regulatory implications, including dynamic alignment, the Trade and Cooperation Agreement (TCA) and any potential future return to the IEM (the consequences of which might render this modification very short-lived or nugatory). There is a need to correct and clarify the narrative within the Proposal document in relation to European and IEM requirements.

The Panel agreed that further refinement is required before the modification can return for approval.

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The Proposer will address additional comments received. Panel members were asked to provide early feedback on legal text and narrative clarity.

Key takeaways – GSR036

Purpose: review operational-timescale voltage limits and explore scope for additional flexibility (including proposal to restore the 275 kV upper limit from +9% to +10%).

Status: re-presented to the Panel with an updated Impact Assessment, but the Panel did not agree to progress the modification at this meeting.

Key feedback themes: strengthen alignment with Grid Code ECC 6.1.4; correct/clarify references to IEM/European requirements; and address legal/regulatory implications (including dynamic alignment, the TCA, and potential future return to the IEM).

Risk/robustness: Panel concern that, without a clear regulatory narrative, the modification could be short-lived or rendered nugatory by wider policy changes.

Next steps: Proposer to update proposal, legal text, and narrative to reflect Panel feedback; Panel members to provide early comments on the updated legal text and narrative clarity (see Action 48 for deadline).

GSR037: ‘Formatting and Housekeeping

This modification aims to make the SQSS a more readable, user-friendly document.

GSR037 was presented to the Panel, with an update on the need for a housekeeping (including formatting) modification, proposing a range of non-substantive changes to improve the clarity, consistency, and usability of the SQSS. These changes include standardising headers, correcting defined terms, remaking tables, reformatting equations and figures, renumbering sections, and decapitalising non-defined terms. The Proposer suggested holding a workshop for interested Panel members to review the changes, address any concerns and avoid the need for a formal workgroup or multiple consultations.

The Panel considered the materiality of the proposed changes and agreed that the only potentially material amendment relates to the change from “GSP licensee” to “gas system planner licence,” which was nonetheless considered appropriate to treat as housekeeping. Concerns raised regarding missing or unclear definitions will be addressed through the proposed workshop.

The Panel agreed that the modification should proceed to Code Administrator Consultation without establishing a formal workgroup.

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6. In flight modification updates

JR talked the Panel through the progression of the in-flight modification for GSR035. The in-flight modification can be found on the NESO website via the following link: [SQSS Modifications](#).

Terms of Reference (ToR) update:

GSR035: ‘System Access Reform – Changes to Enable Beneficial Outages Without Compromising System Security

The Panel reviewed and confirmed the Terms of Reference for the GSR035 workgroup. Discussion covered governance arrangements, stakeholder engagement, the proposed risk-based methodology and the necessity of certain terms, with clarification provided that several elements reflect standard practice. The Panel agreed the Terms of Reference, noting that ToR c) is not necessary and should be removed.

7. Workgroup Reports

No Workgroup Reports were presented to the Panel.

8. Draft Final Modification Reports

No Draft Final Modification Reports presented to the Panel.

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)

Frequency Risk and Control Report (FRCR) – detailed position

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CF updated the Panel on the Frequency Risk and Control Report (FRCR) 2025, which is NESO’s formal assessment of system frequency risk and the adequacy of frequency control arrangements. It underpins the Panel’s recommendations to Ofgem on frequency containment, risk tolerance, and the balance between operational security and cost. At the March SQSS Panel, FRCR 2025 was discussed primarily in the context of assurance, governance, and Panel decision-making, rather than reopening the technical modelling itself.

FRCR 2025 has already undergone extensive scrutiny, including stakeholder consultation, internal NESO review, independent technical review (including work commissioned by Ofgem), and engagement with external experts. This was explicitly noted in discussion to emphasise that FRCR 2025 is not “new” or untested, but rather at a late stage of assurance and decision-making.

NESO’s Frequency Risk and Modelling (FRM) team confirmed that supplementary FRCR 2025 evidence is being finalised and is planned to be submitted to Ofgem on 31 March. This material does not change the core FRCR 2025 conclusions, but provides additional transparency and assurance, particularly around:

- model input data,
- parameter selection,
- conservative assumptions built into the modelling, and
- how safety buffers are applied in the risk assessment framework.

The intention is to strengthen confidence in the robustness of the FRCR methodology and outcomes, responding directly to issues raised during consultation and Ofgem’s independent technical review.

Panel role and voting

There was a discussion regarding the appropriate role of the SQSS Panel in relation to FRCR. Panel members raised concerns about:

- whether they are being asked to “sign off” technical modelling they did not develop,
- how accountability for FRCR decisions should sit between NESO, the Panel, and Ofgem, and
- how to respond to recommendations arising from the independent review.

The emerging consensus from Panel Members was that the Panel’s role should focus on process assurance and governance confidence, rather than reperforming or

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revalidating the NESO technical analysis itself. This distinction will be explored further in a later dedicated Panel session.

It was agreed that the supplementary FRCR 2025 material will be circulated to the SQSS Panel alongside submission to Ofgem. A special SQSS Panel meeting will be held in late April to allow sufficient time for review (including over the Easter period). That session will include both discussion of FRCR governance and a formal Panel vote on the FRCR 2025, bearing in mind NESO's supplementary report (due out by 31 March). This sequencing is intended to ensure transparency, adequate scrutiny, and clarity over the basis on which the Panel is asked to make a decision.

Forward looking governance

Beyond FRCR 2025 itself, the Panel recognised the need to improve future FRCR governance arrangements, including clearer definition of the Panel's decision-making role, how the independent technical review recommendations are tracked and addressed, and how future FRCR cycles (e.g. post2025) are structured to avoid ambiguity around accountability and assurance. NESO confirmed that material on future FRCR governance and Panel voting arrangements will be prepared for discussion at the next scheduled Panel meeting (in May).

Next Steps

Proposer to update GSR036 Proposal, legal text, and narrative to reflect Panel feedback and JR to circulate the collaboration space link for Panel to review.

For the next Panel meeting, it was agreed that:

- the supplementary FRCR 2025 material will be circulated to the SQSS Panel alongside submission to Ofgem on 31 March,
- a special SQSS Panel meeting will be held in late April to allow sufficient time for review (including over the Easter period), and
- the meeting will include both discussion of FRCR governance and a formal Panel vote on FRCR.

The next SQSS Panel meeting will be held on 28 April 2026, 10am-1pm via Microsoft Teams.