

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

Workgroup Meeting 5 , 20 May 2026

Online Meeting via Teams

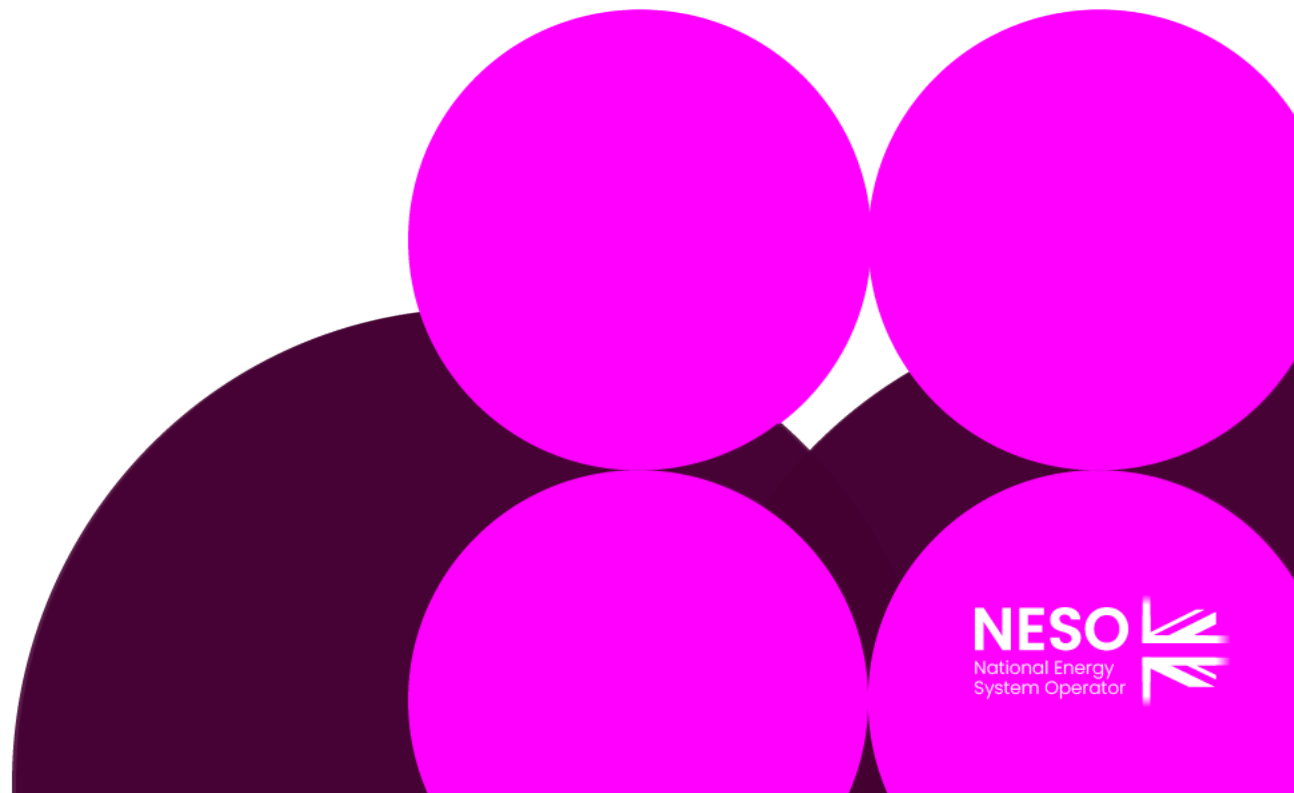
WELCOME

Agenda

| Topics to be discussed | Lead |
|--|-------|
| Objectives and Timeline • Walk-through of the timeline for the modification | Chair |
| Action Log | All |
| Review Workgroup Consultation | All |
| Review Draft Legal Text | All |
| Any Other Business | Chair |
| Next Steps | Chair |

Objectives and Timeline

Ren Walker – NESO Code Administrator

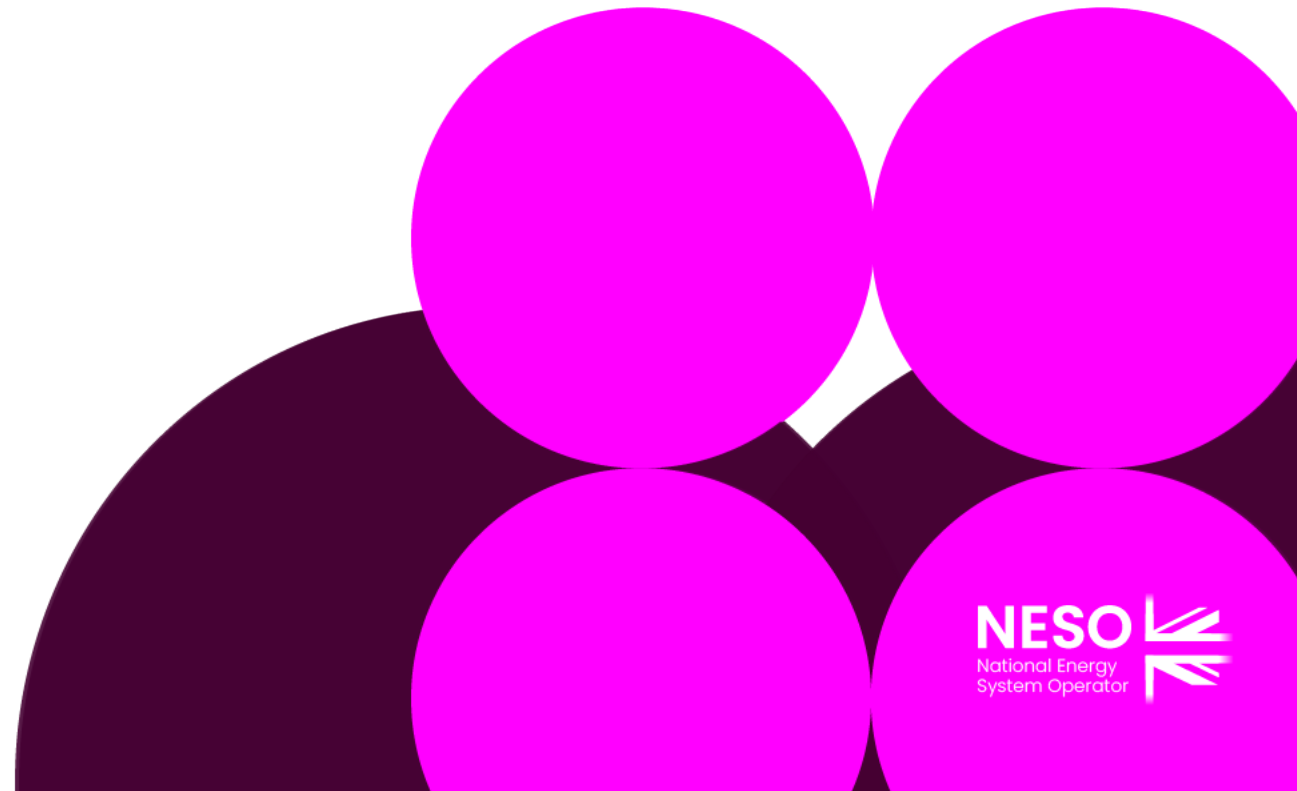


GSR035 Proposed Timeline

| Milestone | Date | Milestone | Date |
|--|---|---|---|
| Modification presented to Panel | 05 December 2025 | Code Administrator Consultation (15 Business Days) | 05 August 2026 to 27 August 2026 |
| Workgroup Nominations (20 Business Days holiday period) | 22 January 2026 – 12 February 2026 | Draft Final Modification Report (DFMR) issued to Panel (5 Business Days) | 15 September 2026 |
| <ul style="list-style-type: none"> • Workgroup 1 – review proposal and legal text • Workgroup 2 and 3 – refine solution, build Workgroup Consultation document and legal text • Workgroup 4 and 5 – approve Workgroup Consultation document | 03 March 2026 11 March 2026 30 March 2026 22 April 2026 (cancelled) 29 April 2026 20 May 2026 | Panel undertake DFMR recommendation vote | 29 September 2026 |
| Workgroup Consultation (15 Business Days) | 08 May – 01 June 2026 26 May – 16 June 2026 | Final Modification Report issued to Panel to check votes recorded correctly | 29 September 2026 to 05 October 2026 |
| Workgroup 5 – review consultation feedback and build Workgroup Report Workgroup 6 – Review Workgroup Report and vote | 29 May 2026 26 June 2026 17 June 2026 – 30 June 29 June 2026 – 07 July | Final Modification Report issued to Ofgem | 06 October 2026 |
| Workgroup report issued to Panel (5 Business Days) | 15 July 2026 | Ofgem decision | TBC |
| Panel sign off that Workgroup Report has met its Terms of Reference | 29 July 2026 | Implementation Date | 10 Business Days after Authority decision |

Action Log

Ren Walker – NESO Code Administrator



| Action Number | Workgroup Raised | Owner | Action | Due by | Status |
|----------------------|-------------------------|-------------------------------|---|---------------|------------------|
| 03 | WG1 | DN/SP/NESO/TO Representatives | Clarify and document how “unacceptable overloading” is interpreted and applied in practice by NESO and the TO’s in England & Wales and Scotland. | WG3 | Propose to close |
| 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 affected users rather than relying solely on NAP arrangements. | WG4 | Propose to close |
| 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 | Closed |

| Action Number | Workgroup Raised | Owner | Action | Due by | Status |
|----------------------|-------------------------|--------------|--|---------------|------------------|
| 15 | WG3 | DN | Define the scope and minimum content of the risk assessment. Develop clarity on what the risk assessment must cover. | Open | Propose to close |
| 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 | Propose to close |
| 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 | Propose to close |
| 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 | Propose to close |
| 19 | WG3 | RW/ALL | Circulate draft consultation and legal text for offline comment 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. | Open | Closed |

| Action Number | Workgroup Raised | Owner | Action | Due by | Status |
|----------------------|-------------------------|--------------|---|---------------|-------------------------------------|
| 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 | Timeline updated. Propose to close. |
| 21 | WG3 | DN | 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 | Propose to close |
| 22 | WG4 | RW/DN | 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 | Open | TBC |
| 23 | WG4 | ALL | To review Workgroup Consultation Report and give feedback/comments | Open | 01 May 2026 |
| 24 | WG4 | DN | To review and update legal text comments | Open | WG5 |

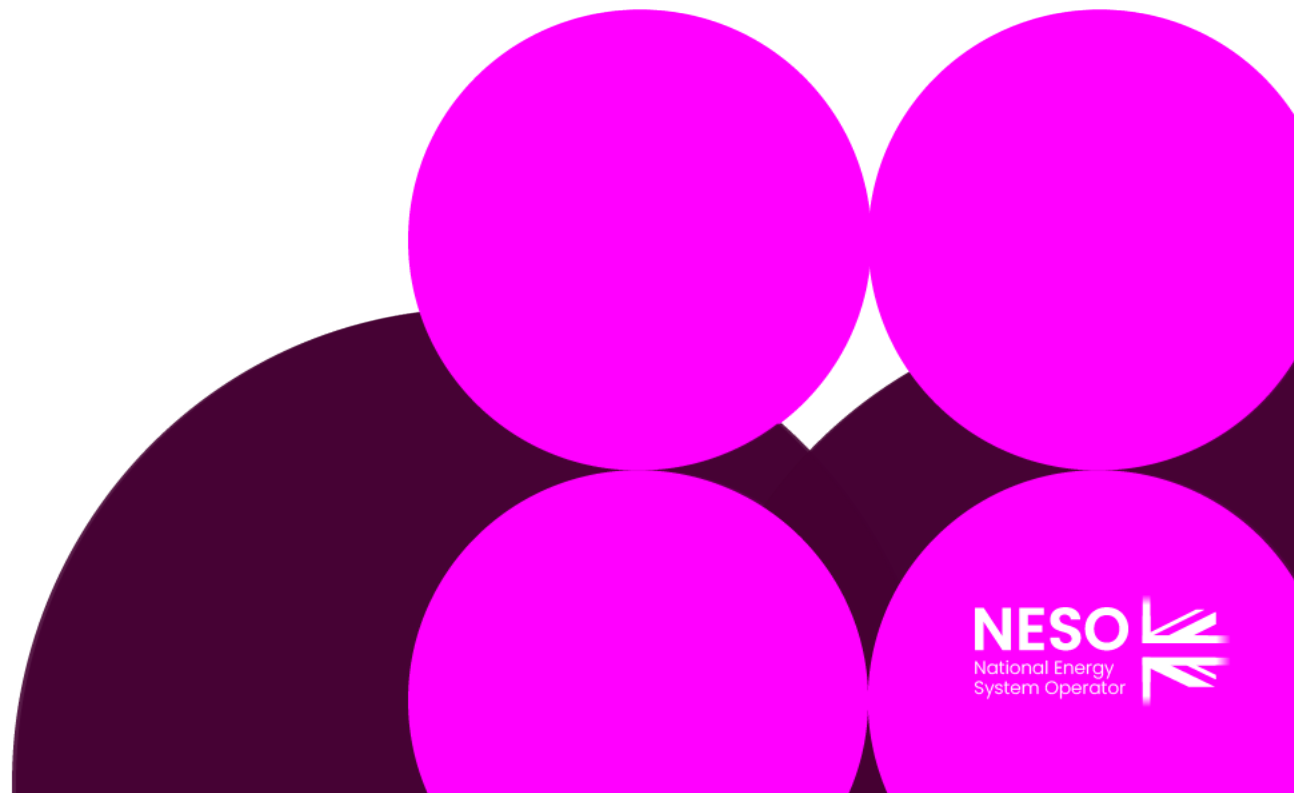
Terms of Reference

Workgroup Term of Reference

- | | |
|----|--|
| a) | Consider the governance arrangements for the risk-based methodology as this need to be documented, open and transparent. The governance needs to be such that any affected stakeholder is able to influence the development and application of the methodology. The workgroup should explicitly consider whether the risk-based methodology should form part of the SQSS. |
| b) | Clearly state the key assumptions and principles associated with the risk-based methodology. |
| c) | Consider the rationale and benefits associated with the balance between short term increase in risk to stakeholders and the longer-term benefits associated with the connection of projects associated with the transition to a low carbon economy. |
| d) | Consider whether a risk-based methodology should be associated with outages other than those to facilitate the implementation of the Clean Power 2030 Action Plan e.g. normal maintenance and asset replacement outages. |
| e) | Consider whether the risk-based methodology should be applied across all four seasons or just during winter, as implied by the modification proposal. |
| f) | Consider the most appropriate place for the methodology to be documented, so that it is open and transparent. |
| g) | Consider the requirement for a Grid Code modification such that there is an obligation for all relevant parties to provide the required data to undertake the risk assessment, engage in the risk assessment process, share the results from application of the methodology and agree to its findings. Consideration should be given to the process where the impacted party does not agree with the outcome of the risk assessment. The party responsible for applying the methodology should also be codified. |
| h) | Consider the number of occasions per annum when the new arrangements are expected to be applied and the relaxations implemented, to form a view of the potential benefits. |
| i) | Consider whether the risk-based approach should be applied to high impact / low probability events only, or whether a risk-based approach could / should be applied to low impact / high probability events. |
| j) | Quantify or provide examples of the change in risk to customer supplies arising from the implementation of a risk-based approach compared to a deterministic approach. |
| k) | Consider the current risk assessment process applied in Scotland and whether it, in its current or modified form could be applied in England and Wales. |

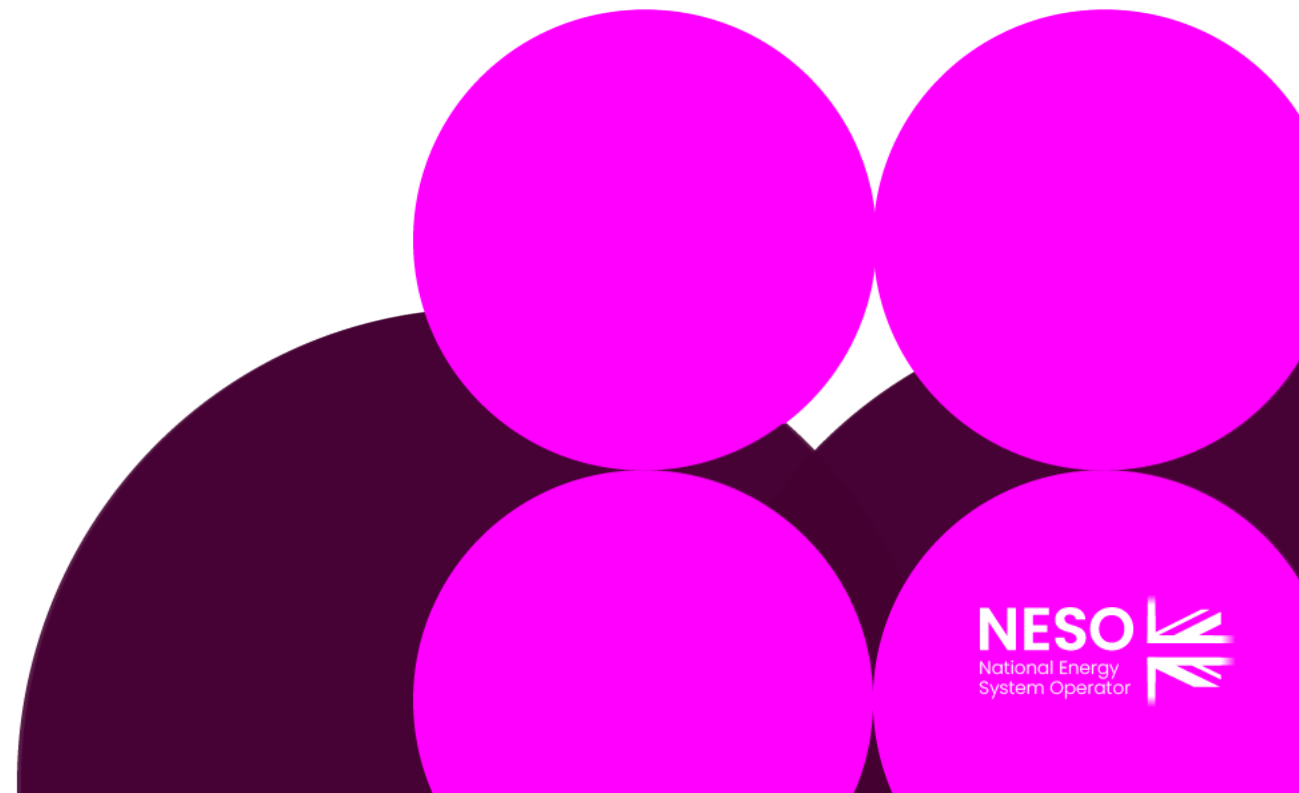
Review Draft Workgroup Consultation

Ren Walker – NESO Code Administrator



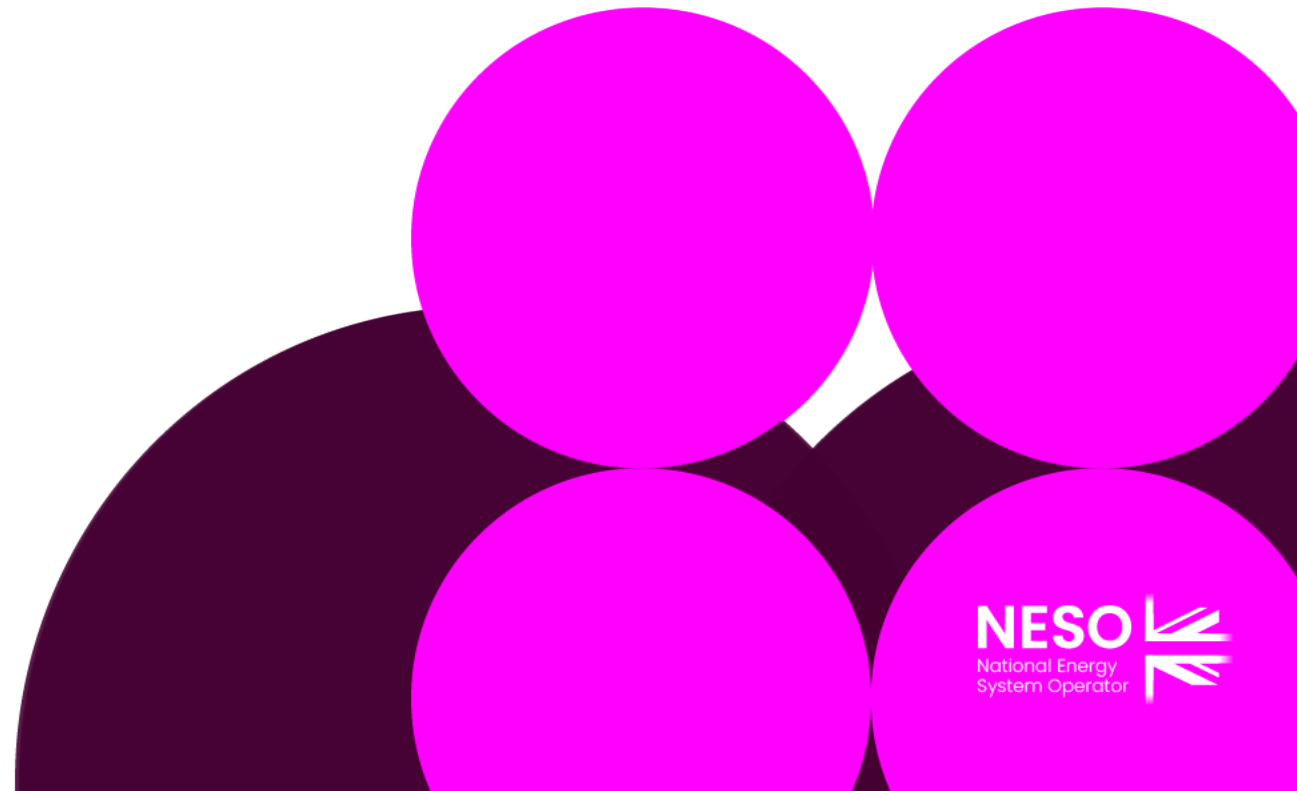
Review Draft Legal Text

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Any Other Business

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Next Steps

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