

GC0186: Proposed Grid Code Changes – Post Electricity System Restoration Standard (ESRS)

Workgroup Meeting 3

Thursday 06 August – 10am

Online Meeting via Teams

WELCOME

Agenda

Topics to be discussed	Lead
Action log Review	Chair
Legal Text Review	Proposer
Workgroup Consultation Review	All
Any Other Business	Chair
Next Steps	Chair

Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared – Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives

Workgroup Membership

Role	Name	Company	Industry Sector
Proposer	Antony Johnson	NESO	System Operator
Workgroup Member	Anas Nassar	National Grid	Network Operator
Workgroup Member	Andrew McLeod	Northern Powergrid	Network Operator
Workgroup Member	Ben Green	Orsted	Generator
Workgroup Member	Garth Graham	SSE Generation	Generator
Workgroup Member	Isaac Gutierrez Dr	Scottish Power Renewables	Generator
Workgroup Member	John Knott	SP Energy Networks	Network Operator
Workgroup Member	Jonathan Lakey	Ocean Winds	Generator
Workgroup Member	Leon Burdekin-Roberts	EDF Power Solutions	Generator
Workgroup Member	Paul Swan	SSEN Transmission	Onshore Transmission
Workgroup Member	Paul Turner	SP ENWL	Network Operator
Workgroup Member	Thomas West	National Grid Distribution	Distribution
Workgroup Member	Tim Ellingham	RWE	Generator
Observer	Kwaku Nti	Perigus Energy	Generator
Observer	Ross McFarlane	Northern Powergrid	Network Operator
Observer	Tina Dawn Marshall	Tina Marshall Consultancy	

Workgroup Membership

Role	Name	Company	Industry Sector
Observer	Victor Ugbome	NESO	System Operator
Authority Representative	Calum Watkins	Ofgem	
BSC Representative	Jacob Snowden	Elexon	
D Code Representative	Jeevan Dhaliwal	Energy Networks	

What is the Alternative Request?

What is an Alternative Request? The formal starting point for a Workgroup Alternative Modification to be developed which can be raised up until the Workgroup Vote.

What do I need to include in my Alternative Request form? The requirements are the same for a Modification Proposal you need to articulate in writing:

- a description (in reasonable but not excessive detail) of the issue or defect which the proposal seeks to address compared to the current proposed solution(s);
- the reasons why you believe that the proposed alternative request would better facilitate the Applicable Objectives compared with the current proposed solution(s) together with background information;
- where possible, an indication of those parts of the Code which would need amending in order to give effect to (and/or would otherwise be affected by) the proposed alternative request and an indication of the impacts of those amendments or effects; and
- where possible, an indication of the impact of the proposed alternative request on relevant computer systems and processes.

How do Alternative Requests become formal Workgroup Alternative Modifications? The Workgroup will carry out a Vote on Alternatives Requests. If the majority of the Workgroup members or the Workgroup Chair believe the Alternative Request will better facilitate the Applicable Objectives than the current proposed Original solution, the Workgroup will develop it as a Workgroup Alternative Modification.

Who develops the legal text for Workgroup Alternative Modifications? NESO will assist Proposers and Workgroups with the production of draft legal text once a clear solution has been developed to support discussion and understanding of the Workgroup Alternative Modifications.

GC0186 Timeline

Milestone	Date	Milestone	Date
Modification presented to Panel	26 February 2026	Code Administrator Consultation (1 month)	03 February 2027 – 03 March 2027
Workgroup Nominations (5 Business Days)	18 May 2026 – 26 May 2026	Draft Final Modification Report (DFMR) issued to Panel	22 April 2027
Workgroup 1 Workgroup 2 Workgroup 3 Workgroup 4	11 June 2026 09 July 2026 06 August 2026 24 August 2026	Panel undertake DFMR recommendation vote	29 April 2027
Workgroup Consultation (15 Business Days)	03 September – 24 September 2026	Final Modification Report issued to Panel to check votes recorded correctly	30 April 2027 – 07 May 2027
Workgroup 5 Workgroup 6 Workgroup 7 Workgroup 8	07 October 2026 04 November 2026 03 December 2026 08 January 2027	Final Modification Report issued to Ofgem	11 May 2027
Workgroup report issued to Panel (papers day)	21 January 2027	Ofgem decision	TBC
Panel sign off that Workgroup Report has met its Terms of Reference	28 January 2027	Implementation Date	TBC

Terms of Reference

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| a) Implementation and costs; |
| b) Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text; |
| 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 |
| d) Consider implications to sections linked to the Regulated Sections of the Grid Code. |
| e) Consider whether it is appropriate to treat NGET, SPT and SHE Transmission in the same way (allowing for Regional differences where agreed) during a Restoration event. |
| f) Consider whether to introduce the concept of Regional Restoration Plans (RRPs) into the Grid Code drafting. |
| g) Consider changes to OC5.7 with regard to deadline charge tests to ensure fit for purpose tests whilst ensuring consistency and efficiency where necessary. |
| h) Consider whether it is appropriate to introduce a requirement into the Grid Code to ensure TOs and Network Operators can switch at sufficient speed to facilitate the Electricity System Restoration Standard. |
| i) Review Planning Code PC.A.5.7 to ensure the requirements apply to CUSC parties, other than Large and Directly Connected Power Stations. |
| j) Ensure consistency between Data Registration Code (DRC) Schedule 16 and other sections of the Grid Code. |

Terms of Reference

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| k) Consider the arrangements to enable Restoration Contractors with one Control Point and multiple sites with Restoration Contracts to meet the requirements of their Restoration Contracts, particularly in terms of timescales. |
| l) Ensure that the Grid Code places a requirement on relevant parties to ensure that LJ RPs, DRZPs and RRP s contain a sufficient level of confidentiality, especially between Restoration Contractors and CUSC Parties (excluding relevant Network Operators). |
| m) Consider any cross-code impacts. |
| n) Ensure the proposed changes arising from this modification do not have a negative impact on CUSC Parties who are already working to meet the requirements of Grid Code modification GC0156. |
| o) Consider any housekeeping changes identified to those parts of the code that are to be updated as part of this modification. |
| p) Consider whether it is appropriate to include, at this stage, the role that CATO's might have in the future in relation to RRP s. |
| q) Identify and consider the costs and resource implications for the parties affected by the proposal. |
| r) Consider how the RRP s will be implemented/instructed. |
| s) Consider the implications for Network Operators and Transmission Owners of the modification proposal. |

Terms of Reference

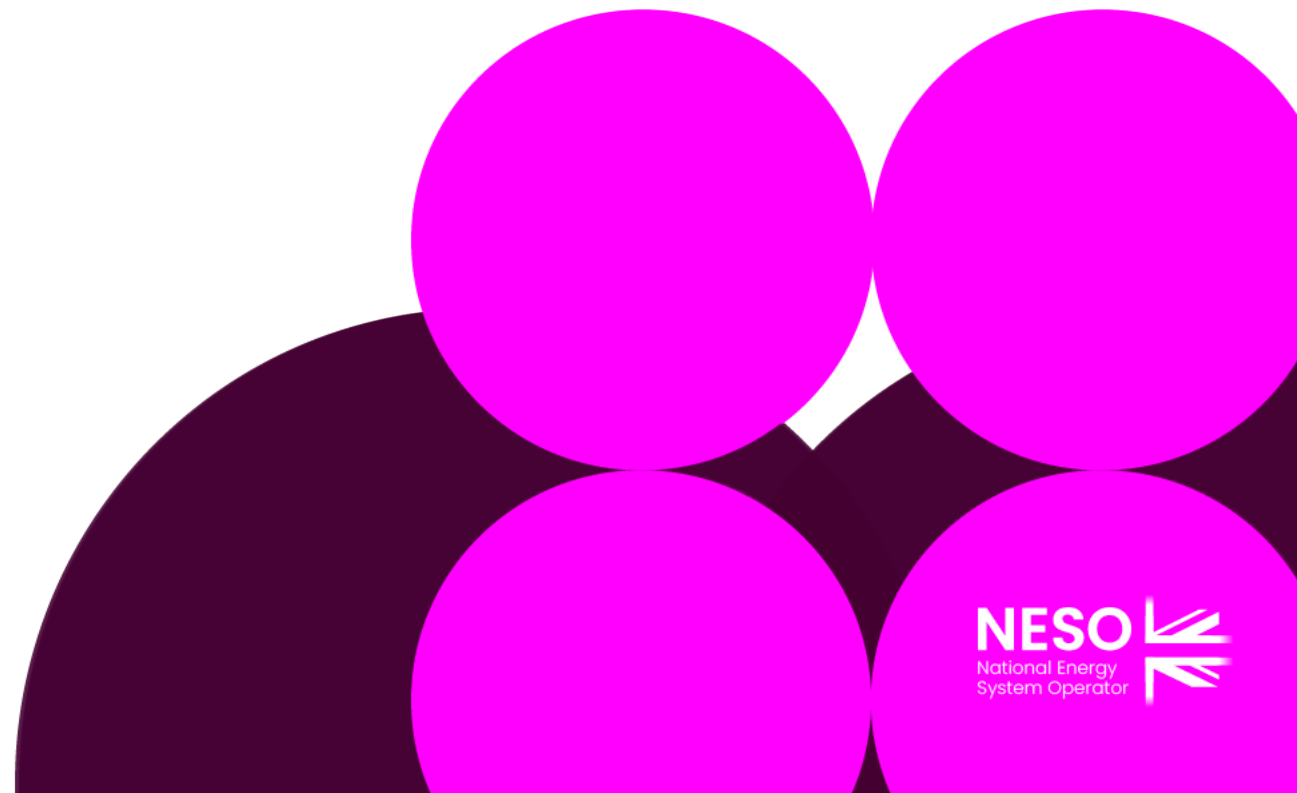
t) Consider whether there are any changes required to the Distribution Code (DCode), particularly DOC9.

u) Consider whether a cost recovery mechanism is required for impacted parties as a result of this proposal.

v) Consider whether clarifications proposed to be introduced by GC0186 could be perceived as being more onerous than existing GCode requirements introduced in GC0156.

Action Log Review

Sarah Williams – NESO Code
Administrator



Action Log

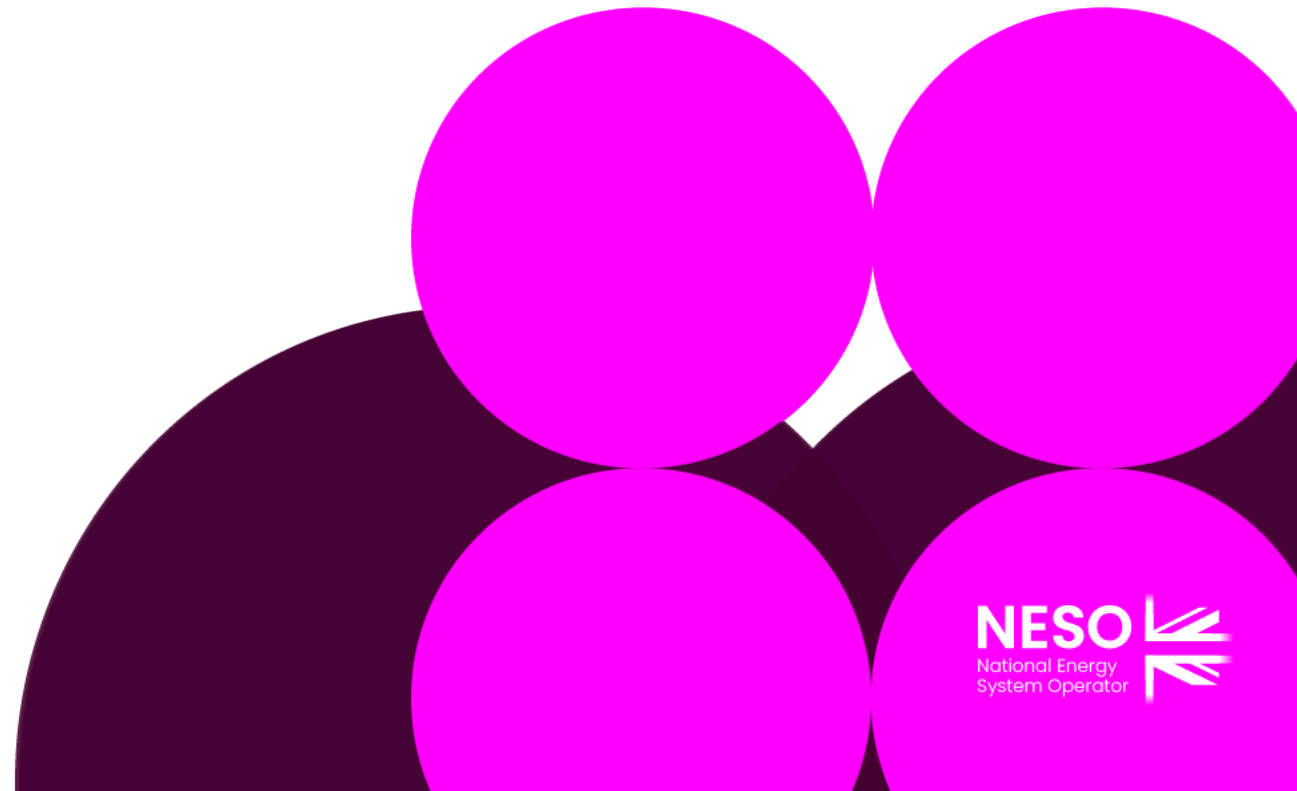
Action	Description	Owner	Due	Status
6	Discuss confidentiality arrangements and restoration provider participation with NESO colleagues to ensure the legal text reflects the latest thinking on anchor, top-up and secondary providers.	AJ	WG3	Open
7	Engage with NGET on protection-related points raised during the presentation with to gain a view from protection specialists, including comments on alternative protection approaches.	AJ	WG3	Open
8	Update the legal text following the meeting discussions and recirculate a revised version to the workgroup for further review. Including: legal text relating to offshore generators, OFTOs, hybrid projects and interconnector-connected restoration services; "technically feasible" drafting following workgroup concerns and consider alternative wording to remove ambiguity.	AJ	WG3	Propose to close
9	Draft and circulate the Workgroup Consultation for member review and populate ahead of the next meeting.	SW	WG3	Propose to close
10	Amend the Terms of Reference by replacing "ensure" with "consider" and submit the updated version back to Panel.	SW	WG3	Propose to close

Actions (6&7)

- 6 – Discuss confidentiality arrangements and restoration and restoration provider participation with NESO colleagues to ensure the legal text reflects the latest thinking on anchor, top up and secondary providers.
 - *Meeting held with NESO ESRS team on 20th July to discuss. For Transmission ~~and~~ LJRPs we do not expect (at the present time) to use Top Up Providers, though the Code will retain the flexibility to do so as they may be required in future. For DRZPs it is expected that Anchor and Top Up Providers will be used. Secondary Generators will not need to sign or be party to a Regional Restoration Plan, the only parties who will need to sign it will be NESO and relevant TOs and relevant DNOs.*
 - *Meeting also held with Scottish Power Distribution on the 17th July where it was confirmed that whilst SPT would be happy to instruct Generation as part of an LJRP this would not be the case in the Regional Restoration Plan (RRP) phase and the aspirational TO and DNO switching time of 10 minutes will be moved from the Grid Code and will be part of the LJRP, DRZP and RRP alone.*
 - *The legal text (in particular OC9) updated to reflect discussions.*
- 7 – Engage with NGET on protection-related points raised during the presentation to gain a view from protection specialists, including comments on alternative protection approaches
 - *Meeting held with NGET on 24th July to discuss testing and the drafting of the legal text in OC5.7. It was agreed that the legal text for deadline charge tests and remote synch tests as developed for Anchor Generators should equally be applied to Anchor HVDC Systems for consistency. NGET have provided an update on testing from their protection specialists which is included in the papers.*

Legal Text Review

Antony Johnson - NESO



High Level Issues identified during Review of Legal Text

- The Legal drafting still includes some regional differences between England and Wales and Scotland. This is on the basis that SPT and SHETL are happy to instruct Generation in the LJRP Phase whereas NGET are not. NGET are more interested in greater autonomy in the LJRP, DRZP and RRP phases (principally switching) so it makes sense for the LJRP, DRZP and RRP to reflect this but still allow for regional differences between England and Wales and Scotland. It should also be noted that SPT would not be happy to instruct Generation in the post LJRP Phase (ie the RRP Phase)
- Propose to remove the 10-minute obligation on TOs and DNOs from the Grid Code as this would be a requirement included in the LJRP, DRZP and RRP (as it varies from location to location)
- A question was raised on what Block Loading is as part of the comments received in ECC.7.11.4. Defined terms of “Block Load” and “Block Load Switching have been introduced into the Glossary and Definitions and text in ECC.7.11.4 updated.
- Propose to step through the legal text comments and updates.

Legal Text Reviewed/Updated (G&D, PC and ECCs)

- Glossary and Definitions (G&D)
 - New Terms introduced – Block Load and Block Load Switching
 - Definition of Anchor Plant Capability changed upon stakeholder comments
 - Definition of LJRP changed – Workgroup (in particular NGET to confirm agreement)
 - Definition of Offshore LJRP changed
- Planning Code (PC)
 - Minor tweaks – Transitional arrangements pre-December 2026 removed.
- European Connection Conditions (ECC)
 - Updates to ECC.7.9, ECC.7.10 and ECC.7.11
 - Additional amendments made to ECC.7.11.4 to cover the newly defined term of Block Load Switching and switching time of 10 minutes removed.
 - Minor House keeping changes
- All the above documents are available on the NESO website including changes and comments.

Legal Text Reviewed/Updated (OC5)

- Operating Code 5 (OC5)
 - OC5.7.2.3 (Anchor HVDC Test or Anchor DC Converter Test) updated to ensure consistency with OC5.7.2.1(g) (Anchor Generating Unit Tests)
 - OC5.7.4.2(viii) updated to ensure consistency with ECC.7.11.4 (Demand switching time)
 - Minor tweaks made for house keeping and consistency
- All the above documents are available on the NESO website including changes and comments.

Legal Text Reviewed/Updated (OC9)

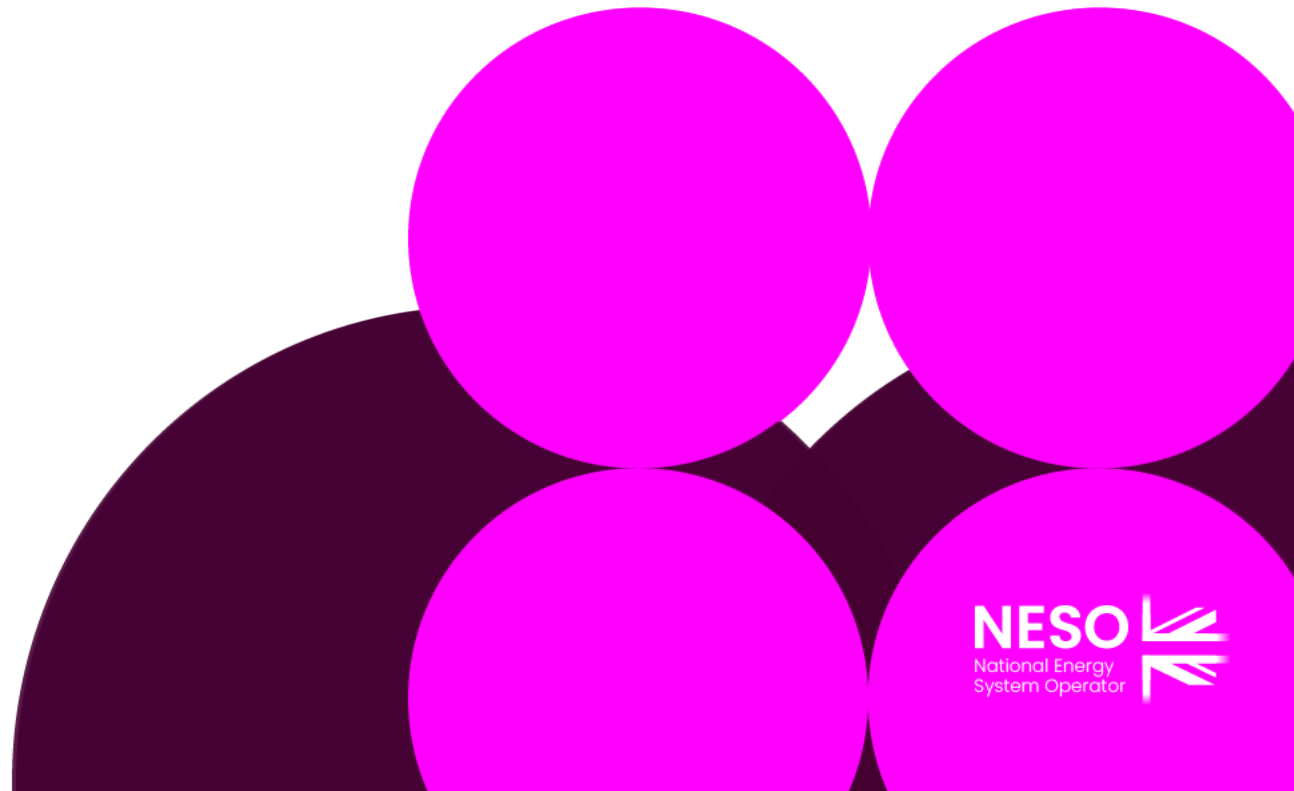
- Operating Code 9 (OC9)
 - OC9.2.6 – Consider merging OC9.2.6(iv) and (v) – for discussion but note referencing will need to be checked.
 - OC9.4.5.1.1 – Updated to rationalise the relationship between Anchor and Top Up Contractors.
 - OC9.4.5.1.3 – Updated – ~~Although NESO only expect one Anchor Plant per LJRP with no Top Up Contractors, this could change in future.~~ The Grid Code legal text has been updated to reflect future flexibility (acknowledging that where a Top Up Restoration Contractor is part of an LJRP) ~~and where they are used~~ appropriate confidentiality provisions will be put in place between Restoration Contractors.
 - OC9.4.5.2.2 – Wording simplified – Role of Anchor and Top Up Restoration Contractors simplified so the arrangements would become part of the DRZP.
 - OC9.4.6 – Last Paragraph – Discussion with workgroup required regarding regional differences – minor amendments made to text.
 - OC9.4.7.9 / OC9.4.7.10 – Regional Restoration Plans drafting updated to clarify that secondary Generators would not sign a Regional Restoration Plan.
 - General comments on Regional differences but in view of the comments received NESO believe ~~think~~ Regional differences should be retained.
- All the above documents are available on the NESO website including changes and comments.

Legal Text Reviewed/Updated (BC2)

- Balancing Code 2 (BC2)
 - Updates to BC2.9.2.2(iv) to cover Regional Restoration Plans as a consequential update.
- All the above documents are available on the NESO website including changes and comments.

Workgroup Consultation Review

Sarah Williams – NESO Code
Administrator

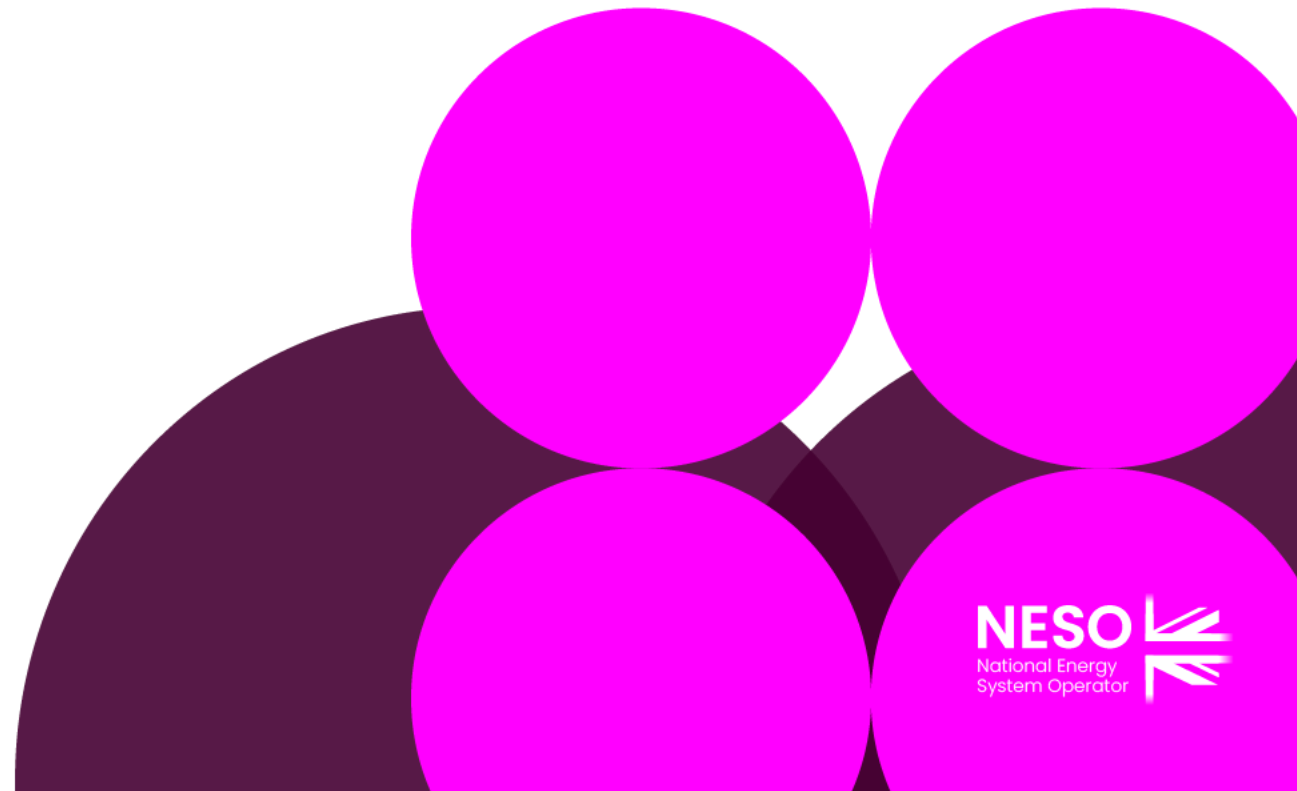


Any Other Business

Sarah Williams – NESO Code
Administrator

Next Steps

Sarah Williams – NESO Code
Administrator



Further Work Required

- Update outstanding Sections of legal text (in particular)
 - Connection Conditions (broadly a copy of the ECCs when finalised)
 - Data Registration Code (awaiting finalisation of Code before amending DRC Sched 16)
 - Other consequential sections of code as necessary
- Review developed legal text
 - Glossary and Definitions
 - Planning Code
 - European Connection Conditions
 - Operating Code 5
 - Operating Code 9
- Review/Develop Draft Consultation.
- Consider raising consequential STC/STCP Change.