Public

Code Administrator Meeting Summary

Workgroup Meeting 8: GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems

Date: 14 August 2026

Contact Details

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

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

Key areas of discussion

The Chair welcomed the Workgroup members and observers to Workgroup 8 and gave a brief outline of the agenda.

Objectives and Timeline

The Chair confirmed that the timeline will be updated to allow further Workgroup review (late August, early September), of consultation preparation and post-consultation review before the Workgroup Report is finalised.

Action Log Review

Action 28: Closed. Following discussion in the Workgroup covering section K.

Action 29: Open. Remains open until the question on agreement, veto or disagreement is included in the Workgroup Consultation material.

Action 30: **Closed**.

Action 31: Open. The Chair advised that a conversation was held with Ofgem regarding the submission of the GSR035 Final Modification Report and the consequential modifications, with Ofgem confirming they will make a decision when all the Final Modification Reports have been submitted. The Chair confirmed she will follow this up via email with Ofgem to confirm this position.

Action 32: Closed.

Review Appendix K

The Workgroup held a detailed discussion on the purpose, scope and governance of Appendix K, particularly in relation to the proposed OCRA/OSCRA methodology. The Workgroup considered whether Appendix K should set out a high-level framework of minimum requirements only, or whether it should include more detail on the operational process. The emerging view was that Appendix K should not attempt to describe every operational step, but should provide sufficient clarity on the principles, minimum requirements and governance expectations that any future methodology must meet.

A key area of discussion was the governance and approval route for the methodology. Workgroup members considered whether both the initial OCRA/OSCRA methodology and any future amendments should be subject to industry consultation and Authority approval. Suggestion made from Workgroup members in strengthening the drafting to make clear that future changes should follow the same governance route, rather than being made outside formal industry oversight. This was linked to wider concerns about transparency, assurance and ensuring stakeholders have confidence in how the process will operate.

The Workgroup also discussed the level of industry involvement required in developing the methodology. Some members felt the drafting should go further than saying parties would be "consulted" or invited to provide input. Clearer wording was requested to ensure that relevant parties would be actively involved in shaping the methodology, particularly network operators, generators, non-embedded customers and other affected or interested parties. This was seen as important because the methodology could affect how outage relaxations are assessed and whether certain parties are exposed to additional operational or compliance risks.
Reporting and transparency were also highlighted as areas requiring further consideration. Workgroup members questioned whether reporting requirements should sit directly in Appendix K or elsewhere, such as licence obligations or supporting methodology documents. The Workgroup agreed that this issue should be captured in the Workgroup Consultation Report so that stakeholders can comment on the proposed reporting approach, including what information should be reported, how often reporting should take place, and in what format.

The Workgroup also considered how OCRA would interact with existing FRCR arrangements where a proposed outage relaxation could have frequency-related consequences. The Workgroup discussion suggested that frequency-related impacts would continue to be assessed under the FRCR process. Where those impacts are material, this may mean that the OCRA process cannot proceed. This point was important because Workgroup members wanted assurance that the new process would not unintentionally bypass or weaken existing frequency risk controls.
Practical implementation was another important theme. Workgroup members discussed how control room engineers would manage an approved OCRA outage in real time, particularly where background system conditions change after an outage has been approved. The Workgroup agreed that the Workgroup Report should acknowledge this practical risk and make clear that control room engineers may need to override or step away from a relaxation if system conditions change or if system security cannot be maintained.

There was also significant discussion on roles, responsibilities and decision-making. Workgroup members wanted greater clarity on who would initiate an OCRA assessment, who would own the process, who would apply the methodology, and who would make the final decision on whether a relaxation should proceed. The Workgroup considered whether these matters should be set out in Appendix K at a high level or left to the detailed methodology. The Workgroup discussion suggested that Appendix K may need to include clearer principles, while the more detailed roles and process steps could sit in the supporting methodology.

The Workgroup debated the assessment approach, including whether the methodology should require “probabilistic or otherwise” assessments. Workgroup members supported an evidence-based approach, with quantitative assessment used where possible. However, the Workgroup also recognised that flexibility may be needed where data is limited or where a more qualitative assessment is appropriate. This reflected a balance between making the process robust and avoiding overly rigid requirements that could make the methodology difficult to apply in practice.

The treatment of consequences and benefits was another point of focus. Workgroup members raised concern that wording such as “likely consequences” could understate or fail to capture worst-case impacts. The Workgroup therefore considered whether the drafting should make clear that both potential consequences and benefits need to be assessed, including the impact on affected parties. This would help ensure that the methodology considers not only the wider benefits of enabling an outage but also the risks and impacts that may arise for individual parties.

The Workgroup discussed how affected parties should be able to register agreement or objection to the assessment outcome. Workgroup members were concerned that objections could simply be recorded without influencing the decision-making process. This led to a wider unresolved issue about whether safety or legal compliance concerns should act as a clear barrier to proceeding with an outage relaxation. In particular, Workgroup members questioned whether a relaxation should be allowed to proceed if an affected party objected on the basis that it would prevent them from meeting safety or legal obligations. The Workgroup agreed that this point requires further consideration and may need clearer wording in Appendix K.

Next Steps

NESO will update Appendix K to reflect the Workgroup’s agreed wording changes, particularly around ensuring that the initial OCRA/OSCRA methodology and any future changes are subject to industry consultation and Authority approval. The updates should also clarify how the methodology will be applied and implemented, including relevant roles and responsibilities, and strengthen the wording so that affected or relevant industry parties are actively involved in developing the methodology rather than simply invited to provide input.

NESO also needs to consider how Appendix K should deal with concerns raised around safety and legal obligations. This includes whether the drafting should distinguish between safety-related objections, non-safety-related objections, and situations where an affected party considers that an outage relaxation would prevent them from meeting legal or safety duties. The section also requires NESO to review the proposed assessment approach, particularly the wording around "probabilistic or otherwise" assessments. The aim is to ensure the methodology is evidence-based and quantitative where appropriate, while retaining enough flexibility for cases where data is limited or unavailable.

Further clarification is also needed on reporting arrangements. NESO should explain in the Workgroup Consultation or Workgroup Report where reporting obligations will sit, what the proposed frequency and format will be, and how industry will be able to engage with or review the reporting output.

The Workgroup Report should also capture practical implementation issues, including how control room engineers will monitor OCRA background conditions, whether they can override or withdraw a relaxation if conditions change, how adverse system conditions will be managed, and how OCRA will interact with FRCR where frequency-related impacts are identified.

NESO and relevant parties need to develop the detailed OCRA/OSCRA methodology process, covering initiation, decision-making roles, affected party engagement, treatment of objections, escalation and approval routes, change control, and how future amendments to the methodology will be consulted on and approved. Once Appendix K has been updated, the Workgroup Consultation can then progress, with the consultation document capturing the key areas of disagreement, open concerns and the rationale for the proposed governance approach.

Actions

For the full action log, click here.

Action Number	Workgroup Raised	Owner	Action	Due by	Status
33	WG8	DN/BA	NESO to consider whether additional Appendix K wording is required to address safety and legal obligation concerns, including how safety-related and non-safety-related objections should be treated within the OCRA	WG9	Open

			decision-making process, and bring proposed wording back to the Workgroup.		
34	WG8	DN/BA/AH	NESO to update Appendix K drafting to clarify that the initial OCRA/OSCRA methodology, and any subsequent changes to it, must be subject to industry consultation and Authority approval. NESO to consider proposed wording around K5 and K6.1, including whether the methodology should expressly cover how it is applied and implemented.	WG9	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
Steve Baker	SB	NESO	NESO Representative
Alan Creighton	AC	Northern Powergrid	Workgroup Member (Alternative)
Andy Lister	AL	Northern Powergrid	Workgroup Member
Amanda Rooney	AM	NESO	Observer
Andrew Urquart	AU	SSE Generation	Workgroup Member
Andrew Henderson	AN	NESO	Observer
Bieshoy Awad	BA	NESO	NESO Representative
Calum Watkins	CW	Ofgem	Authority Representative
Claire Newton	CN	NESO	Observer
Ethan Lau	EL	NESO	Observer
Fraser Scott	FS	SSEN Transmission	Workgroup Member (Alternative)
Graeme Vincent	GV	SP Energy Networks	Workgroup Member (Alternative)

Mark Bowker	MB	National Grid	Workgroup Member
Maria Lopez	ML	NESO	Observer
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Steve Quinn	SQ	National Grid	Workgroup Member