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Grid Code Workgroup Consultation

GC0186:

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

Overview: The purpose of this modification is to update the Grid Code in respect of the restoration requirements following the implementation of GC0156, in particular (but not limited to) the introduction of 'Regional Restoration Plans', the equitable treatment of NGET, SPT and SHETL during a restoration, the ability for Network Operators to switch at sufficient speed, clarifications / improvements in testing / data requirements and correction of known errors.

Modification process & timetable



Status summary: The Workgroup are seeking your views on the work completed to date to form the final solution to the issue raised.

This modification is expected to have a: High impact

On Transmission System Operators, Transmission Owners Network Operators, and Generators to a lesser extent.

Modification drivers: Efficiency, System Operability, Greater Alignment and Transparency.

Proposer's recommendation of governance route	Standard Governance modification with assessment by a Workgroup.
How do I respond?	Send your response proforma to grid.code@neso.energy by 5pm on 24 September 2026 .

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Executive Summary

GC0186 proposes changes to the Grid Code following the implementation of the Electricity System Restoration Standard, including the introduction of Regional Restoration Plans, clearer restoration and testing requirements, and more consistent treatment of the three GB onshore transmission owners¹ (TOs); namely, National Grid Electricity Transmission (NGET), Scottish Power Transmission (SPT) and Scottish Hydro-Electric Transmission Limited (SHEL); during a National Electricity Transmission System (NETS) system restoration event². It has also been raised to improve clarity, support a faster and more coordinated approach to System Restoration, especially TO and Network Operator switching speeds, address issues identified through implementation of the Electricity System Restoration Standard (ESRS) whilst ensuring relevant parties are not disadvantaged by the updated requirements.

What is the issue?

The issue was raised by NGET at the STC Panel in early 2024 noting that the current System Operator Transmission Owner Code (STC) and Grid Code arrangements do not treat NGET, SPT and SHEL consistently during a system restoration event, with NGET having less autonomy than the two Scottish TOs (according to the current, baseline, version of the Grid Code) leading to a slower restoration process, particularly in relation to the operation of a Local Joint Restoration Plan (LJRP). Following the implementation of the Electricity System Restoration Standard (through Grid Code Modification GC0156 and other industry code changes), further Grid Code changes have also been identified that would improve clarity, introduce 'Regional Restoration Plans', address testing and switching speed requirements, correct known legal text errors, and ensure consistency with related codes.

¹ Covering England & Wales, southern Scotland and northern Scotland respectively.

² Which could be either a 'Total Shutdown' or a 'Partial Shutdown', as defined in the Grid Code.

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What is the solution and when will it come into effect?

Proposer's solution: The Proposer's solution is to update the Grid Code to introduce the concept of 'Regional Restoration Plans'³ (RRPs), clarify system restoration-related definitions and requirements, and ensure a more consistent treatment of NGET, SPT and SHETL during any system restoration event, whilst acknowledging that although there will (as a result of GC0186) be greater consistency, these future arrangements between NGET, SPT and SHE Transmission during a system restoration event may not be harmonised, especially in respect of issues such as instructing Generation⁴. It proposes changes to the Glossary and Definitions, Planning Code, Connection Conditions, European Connection Conditions, Operating Code 5, Operating Code 9, Balancing Code 2 and the Data Registration Code to improve testing arrangements, switching speed requirements, confidentiality provisions and general consistency with ESRS implementation.

Implementation date: Ideally, though not critical by the 31 December 2026, to align with the go live date of the Electricity System Restoration Standard. Note: as at the time of this Workgroup consultation, the Workgroup is proceeding to a timetable agreed at the July 2026 Grid Code Review Panel meeting which will see the Final Modification Report for GC0186 going to Ofgem (for a decision) in late Spring 2027.

³ The current intention is to have seven of these plans covering GB.

⁴ Be that Restoration Contractors (as defined in the Grid Code) who are often referred to, in this context, as parties (including generators who are contracted, with NESO or Network Operators, to provide restoration services. These are also often referred to as "*Primary Generators*"). Generators who are CUSC Parties but who do not have a Restoration Contract but that have Grid Code obligations (eg Critical Tools and Facilities), during a restoration event, who are often referred to as '*secondary generators*'. Under the Grid Code, Restoration Service Providers are those parties caught by the "System Restoration Plan (<https://www.neso.energy/document/287266/download> " and cover Generators who have a CUSC Contract and obliged to meet the requirements of the Grid Code and therefore could include "*Primary Generators*" and "*Secondary Generators*". For completeness there is a third group of generators (connected to the distribution network) who are neither contracted restoration service providers nor have any Grid Code related obligations, during a restoration event, and these are often referred to as '*tertiary generators*'.

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Summary of potential alternative solution(s) and implementation date(s):

There have been no alternatives raised to date; if you wish to raise an alternative request, please see the consultation questions and submit the relevant form to the Code Administrator.

What is the impact if this change is made?

This modification is expected to have a positive impact by improving clarity, consistency and coordination of the system restoration arrangements in GB, including the introduction of the concept of 'Regional Restoration Plans' and clearer obligations (for Network Operators) on switching speed as reflected in the Local Joint Restoration Plans, Distribution Restoration Zone Plans and Regional Restoration Zone Plans in addition to changes to facilitating testing and improving confidentiality provisions. It should support faster System Restoration; following a partial or total shutdown while avoiding any additional requirements on CUSC Parties already working towards ESRS compliance.

Interactions

This modification will have an impact with the Distribution Code, especially DOC5 and DOC9. Accordingly, this modification is being progressed via a joint Grid Code / Distribution Code Workgroup having received approval of the Grid Code Review Panel in February 2026 and the Distribution Code Review Panel in April 2026.

In addition, as a result of GC0186, there will be consequential changes required to the STC and STCPs, in particular STCP 06-1. NESO is therefore intending that a separate STC modification is raised shortly before the GC0186 Workgroup Report is submitted to Grid Code Review Panel and Ofgem so that consequential changes developed through this Grid Code modification are reflected into the STC and STCPs.

The Proposer notes that the GC0186 proposed changes to OC9.4 and BC2 will have an EBR impact which will trigger the need for at least a one month consultation.

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What is the issue?

During the final phases of developing the Grid Code and the STC changes through Industry Code Modifications GC0156 and CM089/CM091, NGET raised a request at the STC Panel in early 2024 for NGET to be treated in a similar way as SPT and SHETL during a System Restoration event, noting that SPT and SHETL have much more autonomy (as provided for in Grid Code OC9 and STCP06-1) than NGET, especially during the Local Joint Restoration Plan (LJRP) phase. Greater alignment and autonomy between NGET, SPT and SHE Transmission, especially in the pre and post LJRP phases will result in a faster restoration process which is a fundamental requirement of the Electricity System Restoration Standard in the view of the Proposer.

In response to this action, the National Energy System Operator (NESO) met with NGET in the Summer of 2024 and subsequently developed an informal group with NGET, SPT and SHETL to consider what changes would be required to the Grid Code and STC.

Although it was initially considered that changes would just be required to the System Operator Transmission Owner Code and System Operator Transmission Owner Code Procedure (STCP) 06-1, it soon became apparent, based on the experience of Users progressing through the implementation of the Electricity System Restoration Standard (ESRS), that a range of changes to the Grid Code would also be required including:

- Update Operating Code 9 (OC9) to ensure equitable treatment of NGET, SPT and SHETL during a System Restoration event whilst still allowing for some regional differences where appropriate to do so;
- Introduction of the concept of 'Regional Restoration Plans' (RRPs) including new terms in the Glossary & Definitions;

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- Changes to OC5.7.2.1(g) to accommodate testing (dead-line charge tests) to ensure consistency with OC5.7.2.3(d) and ensure that any revised testing arrangements to simplify testing are as robust as the existing requirements;
- Obligations on Network Operators and Transmission Licensees to ensure sufficient switching speed as reflected through Local Joint Restoration Plans, Distribution Restoration Zone Plans and Regional Restoration Plans to facilitate the ESRS;
- Changes to PC.A.5.7 as the current text only relates to Directly Connected and Large Power Stations, not to Generators who have a CUSC (Connection and Use of System Code) Contract;
- Housekeeping changes in particular consistency between the Planning Code (PC.A.5.7) and Data Registration Code (DRC Schedule 16);
- Requirements for Restoration Contractors with multiple sites but one Control Point;
- Implications for the Distribution Code; and
- Confidentiality in LJRP and Distribution Restoration Zone Plans (DRZPs) between Restoration Contractors.

It has been agreed to raise this Modification as a joint Grid Code/ Distribution Code modification to progress through the Standard Governance process via a Workgroup. It is also proposed to raise a consequential STCP change, to amend STCP 06-1.

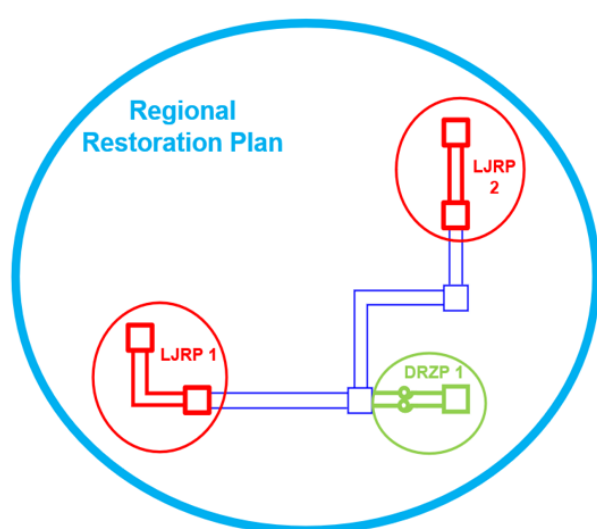
Why change?

Grid Code OC9, and STCP 6-1 currently provide for different arrangements between NGET and SPT/SHETL during a System Restoration event. In Scotland, the two Scottish Transmission Owners (TOs) (SPT and SHETL) have much greater autonomy than NGET in England and Wales, during the implementation and activation of a Local Joint Restoration Plan / Distribution Restoration Zone Plan including the ability to instruct generation directly. Although NGET do not wish to

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instruct generation directly and equally SPT do not wish to instruct generation in the post LJRP/DRZP phases, NGET do want the autonomy to switch circuits back into service without reference to NESO in both the LJRP and post LJRP phases in much the same way as SPT and SHETL.

In addition, Grid Code OC9 currently details LJRPs and DRZPs in a lot of detail but the process between the post LJRP and DRZP phases to the subsequent establishment of a skeleton network and successive return to normal system operating conditions is very light on detail. To address this deficiency, it is proposed to introduce the concept of a 'Regional Restoration Plan' (RRP) which would clarify this process in more detail, a proposal which is supported by NGET, SPT and SHETL. A high-level conceptual diagram of how a RRP would operate in practice is shown in Figure 1.0.



There will be a RRP in each of the NESO regions of the network (2 in Scotland and 5 in England and Wales)

RRP's will detail how the local power islands created by LJRP's and DRZP's in each region will be used to create regional power islands. RRP's will also consider other priorities in each region such as CNI and secondary generation

Regional power islands will be synchronised together until there is a single power island across the network.

Figure 1.0 – Conceptual Diagram of a Regional Restoration Plan

As part of the implementation of Grid Code Modification GC0156, which is scheduled to go live on 31 December 2026, several comments have been received from the industry on improvements to the Grid Code which are listed out in the "What is the issue" section of this proposal.

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In summary, the purpose of this GC0186 modification is to improve clarity whilst ensuring parties currently progressing to achieve the ESRS requirements are not disadvantaged by these proposed requirements, correct any known errors, ensuring consistency between Grid Code sections – for example consistency between DRC Schedule 16 and other sections of the Grid Code and take the opportunity to address any housekeeping issues.

What is the Proposers solution?

The proposed solution addresses the above issues as follows:

- Glossary and Definitions – Introduce the concept of ‘Regional Restoration Plans’ and Block Loading Action, clarify the definition of Anchor Plant capability and update other related definitions to improve clarity.
- Planning Code – Update PC.A.5.7 to apply to Generators with CUSC (Connection and Use of System Code) Contracts, rather than just Large and Directly Connected Power Stations. Ensure PC.A.5.7 is consistent with DRC Schedule 16 and improve clarity in the wording.
- Connection Conditions (CCs) / European Connection Conditions (ECCs)
 - Provide clarification around the phrasing “total loss of supplies” and “cold start” in Sections CC/ECC.7.11;
 - Explicitly define the requirements of Critical Tools and Facilities also apply to Offshore Transmission System Development User Works (OTSDUW) in ECC.7.10;
 - Clarify the requirement on Network Operators and Transmission Licensees to switch at sufficient speed to match the block loading capability of Plant in the LJRP, DRZP and RRP phases;
 - Clarify where Restoration Contractors have one Control Point but have multiple sites with Restoration Contracts, that they have sufficient resource at those Control Points to operate their sites in accordance with the requirements and timeframes defined in the Restoration Contracts; and

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- General housekeeping and consistency checks, especially between the main body of the Grid Code and DRC Schedule 16.
- Operating Code 5 (OC5)
 - Ensure consistency between OC5.7.2.1(g) which relates to deadline charge tests for Anchor Plant and OC5.7.2.3(d) which relates to deadline charge tests for HVDC Systems;
 - Ensure equitable treatment between NGET, SPT and SHETL in respect of deadline charge tests and the possibility of testing to the circuit breaker rather than a dead section of busbar;
 - Ensure that for any deadline charge test or remote synchronisation test, adequate measures are put in place to limit voltage step changes;
 - Ensure that any changes to the testing arrangements in OC5.7.2.1(g) and OC5.7.2.3(d) are as robust as current practice;
 - Include additional testing requirements to ensure Restoration Contractors with one Control Point, but multiple sites can satisfy the requirements of their Restoration Contract timescales;
 - Clarify the requirement on Network Operators and Transmission Licensees in OC5.7.4.2 to switch at sufficient speed to match the block loading capability of Plant in the LJRP, DRZP and RRP phases. The proposed solution would refer to the switching speeds in the LJRP, DRZP and RRP; and
 - General housekeeping and consistency checks.
- Operating Code 9
 - Ensure equitable treatment of NGET, SPT and SHETL during system restoration whilst still allowing for regional differences, noting that NGET do not wish to instruct generation at all and SPT are uncomfortable in switching generation in the post LJRP and DRZP phase;
 - Introduce the concept of RRP's including establishment, testing, provisions and operation;

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- Ensure there is sufficient confidentiality between Restoration Contractors who are party to a LJRP or DRZP;
- Define the requirement for Network Operators and Transmission Licensees to switch at sufficient speed to match the block loading capability of Plant in the LJRP, DRZP and RRP phases. The proposed solution would refer to the switching speeds in the LJRP, DRZP and RRP; and general housekeeping and consistency checks.

What is in and out of scope?

The scope of the Workgroup is strictly limited to the Terms of Reference and solution as highlighted above. Terms of Reference can be found in **Annex 02**.

Workgroup considerations

The Workgroup convened 5 times prior to this Workgroup Consultation to discuss the issue as identified by the Proposer within the scope of the defect, develop potential solutions, and evaluate the proposal in relation to the Applicable Code Objectives.

Workgroup Discussion ahead of the Workgroup Consultation

Consistent Restoration Arrangements Across Transmission Owners and Harmonisation

The Workgroup discussed proposals to improve consistency in restoration arrangements across the three onshore Transmission Owners (TOs), particularly by introducing arrangements that would allow NGET to operate with a level of autonomy more closely aligned to that currently available to the two Scottish TOs whilst still allowing for some regional differences, in particular noting NGET would not wish to instruct Generation in the LJRP, DRZP and RRP phases and SPT would not wish to instruct Generation in the RRP phase. The Proposer explained that the current Grid Code arrangements can require frequent operational instruction from NESO during restoration activities and that greater autonomy, for the three onshore TOs, could support a more efficient and timelier restoration process enabling customers to be restored more quickly following a System Restoration

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event. Some Workgroup members noted that whilst the proposal seeks greater consistency, some regional differences may still need to remain.

However, a Workgroup member noted that in accordance with the (UK) retained EU law, and in particular the Electricity Emergency & Restoration network code⁵, it was *“necessary to set out harmonised procedures that TSOs [TOs] should implement in order to restore the alert or normal state after the spread of the disturbance or blackout state”*^{6 7}[emphasis added]. In the view of the Workgroup member the currently proposed GC0186 solution, with its perpetuation of existing regional differences and extending those regional differences, did not meet this requirement. The member posed a simple question: *‘if not now (with GC0186) then when’* would this statutory requirement be met in the Grid Code?

In terms of the direct relevance of harmonisation and the GC0186 proposed solution (by way of example) the Workgroup member noted the statement above from the Proposer (that *“NGET would not wish to instruct Generating Units in the LJRP, DRZP and RRP phases and SPT would not wish to instruct Generating Units in the RRP phase”*) and the planned changes for Restoration Contractors⁸. In the view of the member by not having a harmonised approach this would mean that those Restoration Contractors would need, within their single Control Point, to operate (during a System Restoration event, when there would be heightened operational uncertainty / workload etc., compared to BAU) to multiple arrangements, depending on whether their generation assets were located in either the NET, SPT or SHETL operational areas. In addition, for secondary generators, in the RRP phase there would also be differences (for those parties) depending on whether their generation assets were located in either the NET, SPT or SHETL operational areas (and this would also be during a System Restoration event, when there would be heightened operational uncertainty / workload etc., compared to BAU). As it’s beyond contestation that harmonisation demonstrably leads to the best overall

⁵ Commission Regulation (EU) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency and restoration (Text with EEA relevance)

⁶ Recital (6).

⁷ The TOs also have other restoration related harmonisation obligations, in terms of Recital (9), in respect of *“Clear, objective and harmonised conditions under which energy transactions could be suspended and subsequently restored should be established”*.

⁸ *“Clarify where Restoration Contractors have one Control Point but have multiple sites with Restoration Contracts, that they have sufficient resource at those Control Points to operate their sites in accordance with the requirements and timeframes defined in the Restoration Contracts”*

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outcome then, in the view of the Workgroup member, by continuing the existing (non-harmonised) regional differences and extending those to other regions this will (i) be detrimental to end consumers and (ii) be non-conforming, in terms of the statutory obligations.

Other Workgroup members noted that whilst developing common legal text may be relatively straightforward, implementing a fully harmonised approach would require substantial consequential changes to operational procedures, licence obligations, industry documentation, operational infrastructure and supporting governance arrangements. It was further acknowledged that affected stakeholders, including NGET, would require the opportunity to fully consider such changes whilst also noting that the Proposer, having due regard for the operational challenges did not support this harmonisation approach.

The Proposer explained that discussions with the ESRS team had identified operational differences between transmission areas and that the legal text had therefore been drafted to retain flexibility for regional approaches.

The Workgroup agreed that the rationale for any retained regional differences had been discussed at a high level as referred to above and on page 24 of this Workgroup Consultation, however the rationale for any retained regional differences should be clearly explained within the final Workgroup Report.

The Workgroup noted, when considering this topic, that key areas for consideration included:

- Delegation of restoration responsibilities.
- The balance between autonomy and operational oversight.
- Opportunities to improve restoration efficiency and reduce restoration times.

Potential consequential changes to the STC, STCPs and Distribution Code.

Introduction of Regional Restoration Plans (RRPs)

A significant area of Workgroup discussion concerned the proposed introduction of Regional Restoration Plans (RRPs). The Proposer highlighted that the current code arrangements provide for Local Joint Restoration Plans (LJRPs) and Distribution Restoration Zone Plans (DRZPs), but (as these deal with Restoration

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Contractors) there is limited detail covering the transition from these local restoration arrangements to the formation of a skeletal network (which involves secondary generators) and the eventual return to normal system operation. GC0186 seeks to bridge this gap through the introduction of RRP.

The Workgroup discussed how RRP could:

- Provide a structured framework for coordinating restoration activities across seven wider geographic areas: (encompassing the whole of GB);
- Facilitate the formation and coordination of regional power islands;
- Support the reconnection and synchronisation of restored sections of the network; and
- Improve clarity within the Grid Code regarding the stages of restoration between local restoration activities through to full system recovery (i.e. returning to BAU).

As part of the Terms of Reference discussion, Workgroup members also considered whether the wording should avoid predetermining the introduction of RRP and instead allow the Workgroup to assess whether and how such arrangements should be implemented.

Restoration Testing Requirements

The Workgroup discussed proposed amendments to the restoration testing requirements under OC5, particularly following feedback from Transmission Owners regarding the practical delivery of restoration tests. The Proposer explained that the existing arrangements require energisation of a dead busbar resulting in associated protection system changes, which can be complex and resource intensive to design and implement. The proposed legal text drafting (which the Workgroup reviewed and is part of this consultation) seeks to simplify the testing arrangements whilst maintaining equivalent assurance that restoration capabilities remain effective.

Members raised several points for further consideration, including:

- Testing up to a circuit breaker rather than energising a dead busbar;

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- The operational implications of the proposed testing regime;
- Network responsibilities and interface considerations;
- The impact on system protection arrangements (although a Workgroup member raise a concern regarding using inverter based generation as anchor generation and testing requirement for such plant are quite different from conventional synchronous generators); and
- Whether simplified testing would provide equivalent assurance to existing requirements.

The Workgroup requested additional information and agreed that further detail would be brought to a future meeting. NGET agreed that they would seek further detail from their Protection specialists and it was agreed that a bespoke session should be arranged with NGET's protection specialists and interested Workgroup members so specific questions could be raised.

Restoration Capability and Cold Start Requirements

The Workgroup discussed proposed amendments intended to improve clarity around system restoration capability requirements and restoration timescales for secondary Generators following feedback received during implementation of the Electricity System Restoration Standard (ESRS). Members considered the distinction between traditional cold-start times for a secondary generator and the restoration times expected of that generator following a total loss of electricity supply (to that generator) due to a Total Shutdown or Partial Shutdown event.

Discussion focused on:

- The interpretation of restoration timing data;
- Proposed updates to wording within DRC Schedule 16 and related sections of the Grid Code;
- Whether any GC0186 revised drafting could alter existing obligations or expectations for secondary generators; and
- The relationship between declared restoration performance and wider restoration planning assumptions.

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The Workgroup sought clarification that the proposal was intended to only improve understanding of existing requirements rather than introduce either new or more onerous obligations on secondary generators. The Proposer confirmed that the intention was to provide clarity and consistency only rather than change the existing requirements or place new requirements on Generators.

Multi-Site Restoration Contractors and Control Point Arrangements

The Workgroup considered arrangements where a Generators single Control Point manages multiple sites with Restoration Contracts. The Proposer highlighted concerns around ensuring that for those parties, they had sufficient operational resources at their single Control Point to be able to discharge the obligations of their multiple Restoration Contracts, in particular their ability to meet the time scales where at their single Control Point which could be at a central location.

The Workgroup discussions included:

- Operational readiness during restoration events;
- Demonstration of adequate staffing and resource arrangements;
- Restoration testing requirements for multi-site operators with one central Control Point; and
- Appropriate drafting to capture these arrangements within the Grid Code.

Workgroup members identified that the proposed Terms of Reference (k)⁹ and the associated draft legal text required further refinement to improve clarity, and further development of the drafting was agreed (which is included as part of this consultation). Clause (clause k) of the Terms of Reference were updated to reflect Workgroup members concerns.

Data Consistency, Definitions and Housekeeping Amendments

The Proposer outlined a number of consequential drafting improvements identified during the implementation of GC0156 and the wider ESRS programme. These include updates to definitions, clarification of existing requirements, improvement of drafting consistency and the alignment of restoration data

⁹ The Workgroup Terms of Reference can be found at Annex 2 of this consultation.

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requirements across different sections of the Grid Code and the Data Registration Code (DRC).

Areas identified for review included:

- New and amended restoration-related definitions;
- Updates to the Planning Code;
- Updates to DRC Schedule 16;
- Alignment between the Planning Code, DRC and operational requirements;
- Clarification of existing restoration terminology; and
- General drafting improvements and error correction.

Confidentiality Arrangements

The Proposer highlighted the need to consider confidentiality provisions associated with the LJRP and DRZP restoration arrangements. Workgroup members discussed how commercially sensitive information contained within Local Joint Restoration Plans, Distribution Restoration Zone Plans and related restoration arrangements should be protected whilst still enabling effective coordination during System Restoration events and the implementation of the plans during system restoration.

It was noted by the Workgroup that the Regional Restoration Plan would not need to be signed by Generators and this is a feature of the proposed legal drafting. Accordingly, there would not be a need to extend the LJRP and DRZP confidentiality arrangements (arising from GC0186) to the seven RRP.

Cross-Code Impacts

The Workgroup discussed potential impacts on other industry codes and governance arrangements. The Proposer confirmed that consequential changes are likely to be required beyond the Grid Code and Distribution Code once the solution has developed further. Relevant areas identified included the STC and STCPs. The possibility of impacts on BSC arrangements was also raised and will be

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explored further at a future meeting though it is thought unlikely that a BSC change will be required as, according to the Proposer, there are no commercial implications on Generators as a consequence of GC0186.

The Workgroup noted that:

- The Grid Code solution should be sufficiently developed before consequential modifications are progressed;
- Distribution Code drafting may be developed alongside subsequent stages of the Workgroup process and would take the lead from the Grid Code drafting; and
- Consequential STC and STCP changes are likely to be required to support the final solution, and it is suggested that The Authority make their decision when the full package of changes across all codes are available.

Restoration Testing Arrangements and Protection Considerations

The Workgroup reviewed the proposed changes to the restoration testing requirements within OC5 and considered a presentation provided by NGET regarding operational challenges encountered during Electricity System Restoration (ESR) testing. The NGET representative explained that, whilst restoration tests are intended to demonstrate a restoration provider's ability to establish and support a power island, certain testing scenarios can create protection-system challenges where a single Restoration Contractor's plant is connected to an isolated section of the transmission network. Under these conditions it was noted that the fault current contributions may be insufficient to operate existing busbar protection schemes (as designed) potentially requiring temporary protection changes, temporary relay installations or extended outage periods to facilitate the restoration testing. The presentation slides can be found in **Annex 04**.

The Workgroup discussed the practical implications of such arrangements and noted that, in some circumstances, facilitating a restoration test could require generation plant to remain unavailable for an extended period whilst protection equipment is reconfigured. NGET stated that the objective of the proposed GC0186 legal text is not to reduce testing requirements, but to provide flexibility in

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determining the network boundary that must be energised during testing and to reduce the period of time required to prepare for the test. This would allow NESO and the relevant Transmission Licensee and/or DNO to agree an energisation point that demonstrates restoration capability while avoiding disproportionate outage requirements and protection-system interventions.

Several Workgroup members challenged whether alternative protection solutions could be used in place of NGETs suggested approach proposal and requested further evidence that the suggested approach is necessary. The Workgroup also considered whether tests undertaken to alternative energisation points provide an equivalent level of assurance compared with energisation of a complete busbar or wider section of transmission system. Views differed on the extent to which the suggested flexibility could affect testing outcomes however the proposed legal text has been revised to provide as much flexibility as possible.

Categories of Restoration Testing and Industry Assurance

As part of the discussion on restoration testing, the Workgroup considered the different forms of restoration testing currently available, including (i) clean busbar energisation, (ii) deadline charge testing and (iii) remote synchronisation testing. It was noted that practical constraints, including network outages, access arrangements and resource availability, mean that clean busbar energisation tests are undertaken more frequently than the more comprehensive testing arrangements as described in (ii) and (iii) above.

The Workgroup discussed whether additional transparency should be provided regarding the number and type of restoration tests being undertaken across the industry. Members considered that publication of testing statistics (by, for example, reporting on how many tests described in (i), (ii) or (iii) are undertaken, by TO area, each year) may help stakeholders understand how restoration capability is being demonstrated and may provide useful assurance in respect of the GB testing; following a recent international power System Restoration event. It was further noted that similar reporting requirements are expected to be included within the developing ESRS Assurance Framework, including annual reporting of restoration contractor testing activity. The Workgroup agreed that any reporting arrangements developed through GC0186 should seek to align with existing

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assurance mechanisms and avoid duplication of requirements. That said when reporting tests, confidentiality of the location of the ESR Generator and LJP would need to be maintained.

Interpretation of "Technically Feasible"

The Workgroup discussed the proposed legal text drafting that refers to restoration testing requirements applying where "technically feasible". Concerns were raised that such wording may unintentionally imply that restoration testing could be avoided where technical difficulties arise. Several members expressed the view that testing Restoration Contractor's Plant and Apparatus should remain subject to appropriate testing requirements and that Restoration Contracts should only be awarded where testing can be undertaken and demonstrated.

In response, the Proposer clarified that the intention of the legal text drafting is not to create an exemption from testing but to provide flexibility regarding the point on the network that must be energised as part of the test. Discussion therefore focused on whether the current wording accurately reflects that intent. The Workgroup agreed that additional drafting changes should be considered to ensure the text clearly relates to the Restoration Contractors test and there is sufficient flexibility in the code to reflect the boundary of the test, be this a circuit breaker, dead section of busbar or dedicated section of the System.

Confidentiality of Restoration Planning Arrangements

The Workgroup undertook a detailed review of the proposed Grid Code legal drafting relating to the confidentiality arrangements associated with Local Joint Restoration Plans (LJRP) and Distribution Restoration Zone Plans (DRZPs) noting that the newly proposed Regional Restoration Plans (RRPs) would not need secondary generators or Restoration Contractors to be signatories to them. As such there would be no confidentiality concerns over Regional Restoration Plans. Discussion centred on the extent to which Restoration Contractors require visibility of information relating to other contracting participants and whether wider access to the LJRP or DRZP information could create commercial confidentiality concerns.

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During the discussion, the Proposer clarified that RRP's are currently intended to be planning documents agreed between NESO, the Relevant Transmission Licensee and relevant Network Operators, describing the restoration process following the successful completion of an LJRP or DRZP. It was further explained that RRP's are not envisaged as being documents requiring signature by Restoration Contractors or Secondary Generators and the proposed legal text reflects this. This prompted further discussion regarding the roles of anchor generators, Top-Up Providers and secondary generators, and whether the existing legal text sufficiently reflects current restoration arrangements. As a result of this discussion, the Workgroup identified a requirement for further engagement between the Proposer, NESO ESRS subject matter experts and Workgroup members to enable final legal text drafting to be developed. The Proposer held further discussions with the NESO ESRS Team and updated the proposed legal text.

Anchor, Top-Up and Secondary Restoration Providers

The Workgroup discussed the interaction between anchor generators, top-up Top-Up Providers and secondary generators under the ESRS framework. Consideration was given to the extent to which Top-Up Providers form part of a LJRP or DRZP and whether existing planning and testing processes sufficiently recognise their role in the restoration process. Views were expressed that where Top-Up services are relied upon within a restoration strategy, the associated planning, testing and governance arrangements should appropriately reflect that dependency.

The Proposer explained that, whilst the Grid Code permits the use of top-up restoration services, Transmission Top-Up Restoration Services, Transmission restoration arrangements are generally capable of being delivered using Transmission connected anchor generators(full service) alone and therefore Top-Up services remain supplementary rather than mandatory in many LJRP scenarios, though the Grid Code does permit their use in order to provide greater flexibility. Where an anchor generator is unable to provide a full (restoration) service but, when combined with the capabilities of a top-up provider, they could (in combination) provide the full (restoration) service needed by NESO. However, the position may differ for DRZPs where Restoration Contractors with smaller anchor generation plant may need to be supplemented by capabilities from a

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top-up service provider in order to sustain the restoration activity needed for the DRZP. The Workgroup considered that the interaction between these provider categories should be further clarified within the legal text (the latest drafting of which can be found at **Annex 03** of this consultation).

Offshore Restoration Arrangements and OFTO Impacts

The Workgroup discussed the future application of GC0186 to offshore Generators, Offshore Transmission Owners (OFTOs), and Interconnectors (along with 'Offshore Hybrid Assets' whereby an offshore windfarm is connected to the NETS via an interconnector, rather than an OFTO). Members noted that the increasing role of offshore generation in future restoration arrangements in GB means that stakeholders require clarity regarding the extent to which offshore scenarios are addressed by the proposed solution. Discussion focused on the possibility of Offshore anchor and top-up providers and whether the current Grid Code (baseline) legal text would remain appropriate as Restoration Services evolve.

The Workgroup acknowledged that some offshore scenarios may not have been fully considered when existing restoration arrangements were originally developed and that future restoration designs involving OFTOs and Offshore Generators connections could introduce additional complexity. The Proposer noted that as part of the Grid Code Modification GC0156 discussions, Offshore Generators and OFTOs had historically been excluded from taking part in LJRP on the basis that the early Offshore projects had not been designed with system restoration capability in mind and to retrofit existing OFTOs with a restoration capability would likely be cost prohibitive. An Offshore Generator could specifically tender for a restoration contract, although this might be unlikely if retrofitting costs arose.

In respect to non-restoration contracting generators; i.e. secondary generators; the Proposer advised that allowances for OFTOs and Offshore Generators developing Offshore projects prior to 5th February 2025 was permitted (as provided for in Annex 21.1 STC Section K clause 1.5 and Grid Code CC/ECC.7.10.8,). However, OFTOs and Offshore Generators (including those developing Offshore Transmission projects) after 5th February 2025 would be required to meet the

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GC0156 restoration requirements of the Grid Code (and equivalent STC requirements).

Harmonisation of Restoration Arrangements in Great Britain

Other Workgroup members noted that whilst developing common legal text may be relatively straightforward, implementing a fully harmonised approach would require substantial consequential changes to operational procedures, licence obligations, industry documentation, operational infrastructure and supporting governance arrangements. It was further acknowledged that affected stakeholders, including NGET, would require the opportunity to fully consider such changes whilst also noting that the Proposer, having due regard for the operational challenges did not support this harmonisation approach.

The Proposer explained that discussions with the ESRS team had identified operational differences between transmission areas and that the legal text had therefore been drafted to retain flexibility for regional approaches.

The Proposer noted that whilst the Workgroup member may consider harmonisation simple from a code drafting perspective, the actual implementation of such a proposal would be very complex and costly whilst also being against the wishes of NGET who had very clearly stated they had no intention, nor did wish to instruct generation. Furthermore, the additional cost and complexity of enabling NGET to instruct Generation in the LJRP phase and indeed SPT in the RRP phase is not insignificant and indeed would have very limited benefit, especially where such a cost is picked up by the end consumer. In addition, the Proposer noted that there are very different structural arrangements between TOs and DNOs in Scotland than in England and Wales. The Proposer advised that if it was the stakeholders intention to push for harmonisation, they would need to raise an alternative.

Secondary Generators and Participation in Restoration Plans

The Workgroup discussed the proposed arrangements for Secondary Generators and their involvement in the restoration planning documentation.

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A Workgroup member emphasised that the Workgroup Consultation and Workgroup Report should make this position explicit to provide certainty to market participants. The Workgroup member requested that it be clearly stated that secondary generators would not be required to sign, nor become party to, any of the three restoration planning documents and would therefore not be subject to associated obligations arising from those three types of restoration plans.

The Proposer advised that following discussions with the ESRS team, secondary generators would not be required to sign, or be party to either (i) the Local Joint Restoration Plans (LJRPs), or (ii) Distribution Restoration Zone Plans (DRZPs) or (iii) Regional Restoration Plans (RRPs). Only NESO, relevant Transmission Owners and relevant Distribution Network Operators would be parties to Regional Restoration Plans and NESO, relevant Transmission Owners, relevant Distribution Network Operators and Restoration Contractors would be signatories to relevant LJRPs or DRZPs.

The Workgroup agreed that this clarification would be beneficial. The Workgroup also noted that further clarity may be required regarding the definition of a "Secondary Generator", as this term is used throughout the discussions but may not currently be explicitly defined within the draft Grid Code legal text for GC0186. It was however acknowledged that the Grid Code already uses similar terms such as "Secondary Response" and therefore could be very confusing.

A further point was raised regarding the potential implications of secondary generators not being parties to Regional Restoration Plans whilst still being affected by the restoration arrangements set out in the Regional Restoration Plans. One Workgroup member noted that this could give rise to differences in what information is communicated to secondary generators during a System Restoration event and suggested that the issue should be captured within the Workgroup Report. The Workgroup agreed this observation should be recorded and considered further through the legal text review process.

Removal of the 10-Minute Block Loading Obligation

The Workgroup discussed the Proposer's intention to remove the fixed 10-minute block-loading obligation from the Grid Code and instead reference the applicable switching times contained within each relevant LJRP or DRZP or RRP. The Proposer

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explained that discussions with network stakeholders had identified practical difficulties with applying a single switching time across all restoration arrangements and that network switching times would therefore be determined through the relevant restoration plans.

Several Workgroup members sought clarification on how secondary generators would obtain visibility of the applicable switching times (to be followed by the relevant TO and / or DNO) if they were not parties to any of the Regional Restoration Plans. Concern was expressed that secondary generators may need access to the relevant block-loading times to support their internal restoration planning and to understand network operator's expectations when the generator was synchronising during the system restoration. One Workgroup member suggested that NESO could provide this information directly to relevant generators through existing annual information exchange processes rather than publishing it more widely. The Proposer agreed to take this concern away and consider whether additional transparency mechanisms, on the part of NESO, may be appropriate to ensure that secondary generators were aware of the block loading switching time that would be relevant for their asset(s).

Other Workgroup members noted that block-loading is delivered as a consequence of network switching activities and the demand associated with that switching would depend on network topology and restoration progress. One Workgroup member suggested that the definition of a block load could be updated to reflect this. It was recognised that additional consideration is needed to ensure secondary generators have sufficient visibility of this critical information (as, during the restoration process, the operation of the generation asset, in terms of its ramping, needs to closely align with the demand being switched by the TO or DNO, otherwise in extremes, the power island could become unstable and collapse).

Definitions of "Block Load" and "Block Load Switching"

The Workgroup reviewed proposed new legal text definitions relating to "Block Load" and "Block Load Switching". Workgroup members agreed that introducing clear definitions would improve consistency throughout the legal text. However, a discussion took place regarding whether the proposed wording sufficiently

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defined the quantity (of the demand load) being referred to (i.e. switched in by the TO or DNO) and whether further clarity was needed regarding how such demand should be measured.

One Workgroup member questioned whether the term "amount of demand" could potentially be interpreted differently by stakeholders and suggested that the drafting should be reviewed to ensure no ambiguity exists. Other Workgroup members noted that the term "Demand" is already defined within the Grid Code and considered that this may adequately address the concern. The Workgroup agreed that members would review the updated drafting and provide any additional comments during the review period.

Anchor and Top-Up Restoration Providers

The Workgroup discussed amendments to the legal text drafting relating to Anchor and Top-Up Restoration Top-up Restoration Providers. The Proposer explained that discussions with the ESRS team within NESO had indicated that some transmission restoration arrangements may only require an Anchor Generator and may not always require Top-Up Restoration Services, although the draft legal text continued to retain flexibility for both arrangements.

Several Workgroup members raised concerns regarding the wording used and queried whether it could be interpreted as changing the fundamental restoration model previously agreed through GC0156. Workgroup members highlighted their understanding that Anchor and Top-Up services had originally been developed to enable restoration capability where a single Anchor provider could not deliver the full (restoration) service¹⁰ independently. It was therefore noted that care should be taken to ensure the legal drafting for GC0186 accurately reflected the continued availability of both approaches and did not unintentionally imply that Top-Up providers were no longer required.

¹⁰ See, for example, the NESO's 'Restoration Services Voluntary RFI' June 2026 ([download](#)) "*National Energy System Operator (NESO) has typically procured restoration services on a regional basis for assets at both a transmission and distribution network level. Procurement of this service has been from a range of Power Generating Modules (PGM) or HVDC systems that have the capability to re-start from shutdown without reliance on external supplies. Top-up services to supplement the technical requirements in any given region have also been procured alongside these full-service (anchor / primary) provisions.*" [emphasis added].

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In response, the Proposer clarified that the legal text continued to recognise both Anchor and Top-Up providers and that no substantive policy change was intended although on the back of this discussion, it was agreed to update the proposed legal text.

Restoration Instructions and Control Arrangements

The Workgroup reviewed the legal text drafting relating to Restoration Contractors acting upon instructions from either NESO or a Relevant Transmission Licensee. Workgroup members sought clarification on how Restoration Contractors would know when authorisation had been delegated from NESO to the TO and from whom they should take instructions, (by the restoration contracted party), particularly where a single Control Point may operate assets located across multiple transmission areas with different arrangements for different restoration contracts.

Concern was expressed that restoration contractors Restoration Contractors should not be placed in a position where conflicting instructions could potentially be received from different parties. Workgroup members emphasised the importance of clearly defining who is responsible for issuing instructions under different restoration scenarios and ensuring that Restoration Contractors understand both their obligations and from whom they should take their instruction(s). The Proposer agreed that this was an important issue and confirmed further consideration would be given to whether additional clarification should be incorporated into the draft legal text.

The Proposer clarified the issue of NESO delegating responsibility to instruct Generation to SPT or SHE Transmission during the LJRP Phase is an issue that would exist today even under the retained EU Emergency and Restoration Code under STCP 06-1 and that under a restoration event, a Generator could receive an instruction from NESO, SPT or SHE Transmission and this has been the case for many years.

Exceptional Circumstances and STCP 06-1

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The Workgroup held a detailed discussion regarding references to "exceptional circumstances" within the legal text drafting for OC9 and the interaction with STCP 06-1. Workgroup members sought clarification regarding the circumstances under which a Scottish Transmission Owner (or, going forward under GC0186, NGET) may invoke an LJRP or DRZP under these provisions and whether such arrangements extended beyond just Partial or Total Shutdown scenarios. One TO suggested that "exceptional circumstances" might be limited to where the loss of Control Telephony meant the TO could not speak to the NESO's control centre, but the Proposer advised that this issue is covered under STCP 06-1.

Several Workgroup members considered that the term "exceptional circumstances" was not sufficiently clear and requested further explanation of the circumstances intended to be captured and thus, also, what would be considered to not be "exceptional circumstances"). Questions were also raised regarding stakeholder visibility, including whether market participants and non-restoration parties would be aware when such arrangements had been invoked by the TO(s). Workgroup members suggested that further explanation or clarification may be required either within the legal text or supporting documentation. The Proposer agreed to review the drafting and consider possible improvements following receipt of Workgroup comments.

Planning Documentation

The Workgroup discussed which parties would have access to various restoration planning documents and annexes¹¹. Workgroup members requested greater clarity regarding the information that would be made available to Restoration Contractors, particularly where confidentiality considerations apply. Questions were raised regarding whether all Restoration Contractors would receive access to the complete LJRP or DRZP (to which they were a party) or only the relevant annexes. The Workgroup agreed that further consideration of document access arrangements would be beneficial and Workgroup members would provide additional comments during their legal text review.

In the Grid Code Legal Text a Restoration Plan as defined includes an LJRP or DRZP but not an RRP which is separately defined. The intention of the modification is to

¹¹ In the form of either the LJRP or DRZP or RRP.

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ensure that Restoration Contactors do not have visibility of each other through an LJP or DRP and as a result confidentiality arrangements need to be put in place. It is proposed that one way of achieving this would be via annexes to the LJP or DRP which would be a matter for the Restoration Plans themselves but not the Grid Code legal text.

Draft legal text

The following sections of the Grid Code Legal Text which are proposed to change under this modification:

- Glossary & Definitions
- Planning Code
- Connection Conditions
- European Connection Conditions
- Operation Code 5
- Operating Code 9
- Balancing Code 2
- Data Registration Code

Updates to other areas of the Grid Code where necessary to ensure consistency with the changes detailed in the solution section of this document.

Changes to the Data Registration Code Schedule 16 are expected to ensure consistency with revised sections of the Grid Code.

What is the impact of this change?

This change will impact the following parties:

Party	Impact

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NESO	It will provide greater clarity, introduce the concept of 'Regional Restoration Plans', ensure equitable treatment between NESO and NGET, SPT and SHETL (allowing for any regional difference where appropriate), provide clarification on switching speed in LJRP, DRZPs and RRP which is a necessity for implementation of the ESRS and address some outstanding issues which have been picked up as part of implementation of ESRS.
NGET, SPT and SHETL	Provide greater autonomy for NGET during System Restoration and ensuring greater consistency with SPT and SHETL whilst still allowing for regional differences. Provide greater clarity and flexibility for deadline charge tests. Clarify in the LJRP, DRZP and RRP the need for Transmission Licensees to switch at sufficient speed to match the block loading capability of Plant.
Network Operators	Clarify the need for Network Operators and Transmission Owners to switch at sufficient speed to match the block loading capability of Plant in the LJRP, DRZP and RRP phases.
Restoration Contractors	Ensure Restoration Contractors with a single Control Point can confirm that each of their sites with a Restoration Contract can meet the terms of that contract, in particular with regard to timescales. Ensure LJRP's and DRZPs are structured in such a way as to provide confidentiality between parties. Ensure that as part of deadline charge testing, mitigation measures are included to prevent voltage step changes.
CUSC Parties	Introduce the concept of 'Regional Restoration Plans' (RRPs). The aim of this modification is not to apply additional requirements on CUSC parties who are already working towards

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	achieving the requirements of the Electricity System Restoration Standard which becomes effective on 31 st December 2026.
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Original Proposer's assessment against Code Objectives

Proposer's assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(i) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;	Positive We see the proposals as positive against this Grid Code Objective. Equitable treatment of NGET, SPT and SHETL and the introduction of a 'Regional Restoration Plan' will speed up the Restoration process following a System Shutdown which we see as positive.
(ii) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	Positive Confidentiality between Restoration Contractors during the LJRP and DRZP phases which is essential for facilitating competition.
(iii) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	Positive The proposals suggested should promote a more holistic approach and result in greater restoration times should a system shutdown occur.

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(iv) To efficiently discharge the obligations imposed upon the licensee by this license* and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and	Positive The proposals will result in a greater ability to meet the requirements of the Electricity System Restoration Standard which is a NESO Licence Requirement.
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements	Neutral

* See *Electricity System Operator Licence*

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Positive The changes will result in an improved ability to restore the system
Lower bills than would otherwise be the case	Neutral There will be no cost impact to consumers as a consequence of this change.
Benefits for society as a whole	Positive The changes introduced by this modification will result in faster restoration of the system following a total or partial system shutdown and the sooner supplies are restored the greater the benefit to society.
Reduced environmental damage	Positive If site supplies are restored more quickly it is expected to result in the prompt restoration of other systems such as water, sewage and communication networks which will have a positive impact on reducing environmental damage.

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Improved quality of service	Positive Restoring site supplies more quickly and getting customers supplies back on is seen as positive in improving quality of service.
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When will this change take place?

Implementation date:

Ideally, though not critical by the 31 December 2026 though in view of a slight slippage to the timeline and interactions with the Distribution Code it was agreed at the July Grid Code Review Panel that May 2027 would be a more realistic implementation date.

Note: as at the time of this Workgroup consultation, the Workgroup is proceeding to a timetable agreed at the July 2026 Grid Code Review Panel meeting which will see the Final Modification Report for GC0186 going to Ofgem (for a decision) in late spring 2027.

Proposer's justification of Implementation date:

An implementation date of the 31 December 2026 would be beneficial to align with the Go-Live date for the Electricity System Restoration Standard. Although not critical it would be helpful if they were aligned.

Date decision required by

TBC

Implementation approach

There would also need to be a consequential STC/STCP Change. This modification has been raised as a combined Grid Code/Distribution Code

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modification and a consequential STC /STCP change is raised before the Final Modification Report is submitted to The Authority.

Proposer’s justification for governance route

Governance route: Standard Governance modification with assessment by a Workgroup

This modification contains quite a few moving parts with potentially large volumes of legal text. It is therefore felt that it is best if this modification is progressed via a Workgroup through the standard governance route.

Interactions

☐ CUSC	☐ BSC	☒ STC	☐ SQSS
☐ European	☒ EBR Article 18	☐ Other	☒ Other
Network Codes	T&Cs ¹	modifications	

This modification will have an impact with the Distribution Code, especially DOC5 and DOC9. This modification is therefore run as a joint Grid Code / Distribution Code Workgroup which has been approved by both the GCRP and DCRP.

In addition, there will be changes to the STC and STCPs, in particular STCP 06-1. It is therefore proposed a separate STC modification is raised towards the end of this Grid Code modification ahead of the Final Modification Report as submitted to the Authority so that consequential changes developed through this modification are reflected in the STC and STCPs.

The Proposer notes that proposed changes to OC9.4 and BC 2 will have an EBR impact.

Industry engagement and feedback

An initial industry working group was established in the Summer of 2024 with NGET, SPT and SHETL. This group was then expanded with the DNOs in September 2025 to discuss and progress concepts. The issue was presented to the Grid Code Development Forum and Grid Code Review Panel in February 2026 and Distribution Code Review Panel in April 2026.

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How to Respond

Standard Workgroup Consultation questions

1. Do you believe that the Original Proposal better facilitate the Applicable Objectives versus the current baseline?
2. Do you support the proposed implementation approach?
3. Do you have any other comments?
4. Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider
5. Does the draft legal text satisfy the intent of the modification?
6. Do you agree with the Workgroups assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 Terms and Conditions held within the Code?

Specific Workgroup Consultation questions

7. Do you think it is appropriate to include the block load switching time in each LJRP, DRZP and RRP rather than specifically referencing a 10-minute switching time on a best endeavours basis in the Grid Code? If not, please provide your rationale.
8. Do you agree that the proposed legal text will not create any additional obligations on secondary Generators?
9. Do you agree that it is appropriate to retain some pre-existing regional differences between the practices in NGET with those in SPT and SHET (as set out on pages 12 – 14 and page 31)? Please provide your rationale.
10. Do you believe that the solution should explore moving to a fully harmonised approach between NGET, SPT and SHET (as set out on pages 12 – 14 and page 31)? Please provide your rationale

The Workgroup is seeking the views of Grid Code Users and other interested parties in relation to the issues noted in this document and specifically in response to the questions above.

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Please send your response to grid.code@neso.energy using the response proforma which can be found on the GC0186 [modification page](#).

In accordance with Governance Rules if you wish to raise a Workgroup Consultation Alternative Request please fill in the form which you can find at the above link.

If you wish to submit a confidential response, mark the relevant box on your consultation proforma. Confidential responses will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel, Workgroup or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CC	Connection Conditions
CNI	Critical National Infrastructure
CUSC	Connection and Use of System Code
DCRP	Distribution Code Review Panel
DRC	Data Registration Code
DRZP	Distribution Restoration Zone Plan
EBR	Electricity Balancing Regulation
ECC	European Connection Conditions
ESRS	Electricity System Restoration Standard
GC	Grid Code

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HVDC	High Voltage Direct Current
LJRP	Local Joint Restoration Plan
NESO	National Energy System Operator
NGET	National Grid Electricity Transmission
OC	Operating Code
OTSDUW	Offshore Transmission System Development User Works
PC	Planning Code
RRP	Regional Restoration Plan
SHETL	Scottish Hydro-Electric Transmission Limited
SPT	Scottish Power Transmission
SQSS	Security and Quality of Supply Standards
STC	System Operator Transmission Owner Code
STCP	System Operator Transmission Owner Code Procedure
TO	Transmission Owner

Annexes

Annex	Information
Annex 01	GC0186 Proposal Form
Annex 02	GC0186 Terms of Reference
Annex 03	GC0186 Draft Legal Text

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Annex 04	NGET Presentation – Protection System Risks During ESR Tests
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