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SQSS Modification Proposal Form

GSR035: System Access Reform – Review of the operational requirements on the Onshore Systems

Overview: This modification is to review the operational criteria to enhance system access through the appropriate treatment of low probability low impact events and through limited time relaxation of the operational criteria under certain conditions.

Modification process & timetable

1	Proposal Form 06 November 2025
2	Workgroup Consultation 22 April 2026 – 14 May 2026
3	Workgroup Report 15 July 2026
4	Code Administrator Consultation 05 August 2026 – 27 August 2026
5	Draft Final Modification Report 15 September 2026
6	Final Modification Report 06 October 2026
7	Implementation 10 Business Days after Authority decision

Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

This modification is expected to have a: Low impact on Transmission Operators, (TOs), National Energy System Operator (NESO), Distribution Network Operators (DNOs), Non-embedded Customer, Transmission Licensees, Interconnectors and Generators.

Proposer's recommendation of governance route	Standard Governance modification with assessment by a Workgroup.	
Who can I talk to about the change?	Proposer: Dozie Nnabuike Dozie.Nnabuike@neso.energy 07970004786	Code Administrator: box.SQSS@neso.energy

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What is the issue?

- The current operational criteria for the National Electricity Transmission System (NETS) often blocks essential maintenance works or upgrades, when the probability of a significant and highly impactful fault is very low, more information can be found in case study¹. This may slow down network development progress and can delay projects that would eventually benefit the end consumers.
- NETS Security and Quality of Supply Standard (SQSS) Section 5, which is applicable to onshore systems, requires that all secured events be assessed under the same criteria. This can result in operational costs that are disproportionate to the probability and the impact of some secured events². It also restricts the number of outages that otherwise could be admissible at any point in time.
- The operational criteria in NETS SQSS Section 5, offer limited flexibility when it comes to responding to occasions when the probability of an event and the costs and means of meeting certain criteria are disproportionate to the risks it prevents. As a result, the probability of outage occurrence and the impact of some secured events under the current restrictions become excessive. Such factors may result in increased operational costs, eventually leading to higher consumer bills. This applies across Great Britain (GB) but is more pronounced in onshore transmission systems in England and Wales. In Scotland, relaxed criteria are allowed provided they do not cause any widespread disturbance on the network. Any relaxations need to be agreed by the impacted transmission licensees as well. This principle applies when some low probability events are required to be secured at all times even if their impact is limited.

Why change?

The Electricity Networks Commissioner (ENC) published a report in June 2023 that focused on the need to accelerate electricity transmission network build³.

In November 2023, National Energy System Operator (NESO) subsequently initiated a project with Transmission Owners (TOs) to deliver the outage planning recommendations from the Commissioner's Report. Over the course of 2024, projects were run in parallel to determine the actions and recommendations required to deliver the four outage planning areas in the Electricity Commissioners report. There was a

¹ Please see **Annex 2**.

² Please see **Annex 2**.

³ Electricity Networks Commissioner – Companion Report Findings and Recommendations, 2023:

<https://assets.publishing.service.gov.uk/media/64c8e85219f5622360f3c0ee/electricity-networks-commissioner-companion-report.pdf>

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public consultation subsequently released in February 2025. The consultation includes a detailed summary of each of the project workstreams, which can be found on the NESO website⁴.

The Clean Power 2030 (CP30) Action Plan report also highlighted that the current system access process is insufficient to support the scale and pace of the transmission network development⁵ required to meet the UK's 2030 clean power⁶ aspirations. It stated that to meet CMP30, network build must proceed at more than four times the rate of the last decade, delivering twice as much in half the time. However, to deliver infrastructure at four times the historical rate, a strategic overhaul of system access arrangements is needed. Such strategic measures would eventually enable the achievement of the Net Zero 2050 targets. System access will play a key role in the deliverability of CP30. Industry stakeholders should work together to understand how system access can be improved to facilitate CP30 without having a detrimental impact on consumers. Industry stakeholders should work together. In this regard, system access should be seen as an enabler to meet CP30 and not a blocker.⁷

This GSR035 Proposal enables a beneficial increase in the number of network outages sanctioned—those that facilitate critical upgrades—without materially compromising system security.⁸

Therefore, this Proposal aims to:

- Improve outage planning flexibility and efficiency.
- Transition from a deterministic to a probabilistic and risk-based approach on a case-by-case basis, the industry can better accommodate network outages without unnecessary delays. This flexibility is not intended to compromise system security; it allows for case-by-case assessments, which will be carried out and agreed by the impacted stakeholders.
- Reduce consumer costs and constraint impacts.
- Facilitate an increase in the number of additional network outages.
- Require consideration of the increase in risk to the electricity supply to consumers and demonstrate that any additional risk is acceptable.
- Anecdotal evidence case study in the Scotland area⁹.

⁴ Transmission Acceleration Action Plan, Consultation Report, 2025

⁵ Transmission Acceleration Action Plan, 2025. Government Response to the Electricity Networks Commissioner, 2023

⁶ Clean Power 2030 Action Plan, 2024

⁷ Electricity Networks Commissioner – Companion Report Findings and Recommendations, please consult the reference material.

<https://assets.publishing.service.gov.uk/media/64c8e85219f5622360f3c0ee/electricity-networks-commissioner-companion-report.pdf>

⁸ Electricity Networks Commissioner – Companion Report Findings and Recommendations, op cit.

⁹ GSR008, Regional Variations and Wider Issues

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- Reflect on the risk-cap since the same events would be secured if they have a high impact (SQSS clause 5.3) or if their probability increases (SQSS clause 5.5).

This SQSS modification aligns with the Transmission Acceleration Action Plan¹⁰ and the System Access Reform (SAR)¹¹, <https://www.neso.energy/industry-information/system-access-reform> which has broad industry support, and aims to modernise network access planning, reduce emergency recalls, and support a consumer-centric approach leveraging digital technologies.

What is the Proposer's solution?

The solution is to update the SQSS to allow more flexible, risk-based decision-making for network outages and constraints. This will be achieved by:

- Deleting clause 5.4 which requires that the onshore transmission system in England and Wales be secured for all double circuit faults. These events will continue to be secured if they have significant impact (as per clause 5.3) or if their probability is higher than usual (as per clause 5.5). The change provides consistent alignment with operational criteria across GB.
- Adding a new clause 5.11.3 to the legal text that provides for the relaxation of requirements for specific secured events under limited conditions if these are identified through a robust process approved by the Authority. This new process is likely to form a part of the network outage planning process so it will either be under the TOs Network Access Policy (NAP), in the System Operator Transmission Owner Code (STC), or a combination of both.
- Regarding clauses 5.3 and 5.5, the proposal does not recommend changes to the thresholds for the demand groups that must not be affected by such disturbance; however, there may be benefit in the Workgroup considering such an increase or decrease.

Draft Legal Text

Legal text changes will be drawn up during the Workgroup process. The draft legal text is enclosed with this Proposal which can be found in **Annex 01**. The add in of the clause 5.11.3 is included in the proposed legal text as per the following wording:

5.11.3 "only if identified by a robust assessment process that is approved by the Authority, and only for the background conditions and duration identified by such process, for specific secured events which if secured would have an impact on a transmission licensee's ability to complete their planned construction works or on the operational

¹⁰ Transmission Acceleration Action Plan, 2023

¹¹ System Access Reform Programme, <https://www.neso.energy/industry-information/system-access-reform>

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costs arising from these works that is significantly disproportionate to the risks arising from not securing them over a specific period of time.”

What is the impact of this change?

A low¹² impact to TOs, NESO, Network Operators, Offshore Transmission Owners (OFTOs), Non-Embedded Customers, Interconnectors and Generators.

This change would enable NESO and the TOs to use a risk-based approach instead of a deterministic approach to manage outage, instead of including all the double-circuit faults covered by the standard. It would create a uniform consistent criterion between regions in GB. Furthermore, NESO may be able to apply a case-by-case study, and a probabilistic risk assessment (N-2, N-1) to schedule network outages securely.¹³ Non-Embedded Customers, Interconnectors, Network Operators and Generators, are impacted through the possibility of outage overlapping with operations or need for system access¹⁴. Despite this, Non-Embedded Customers, Interconnectors and Generators may benefit from faster project delivery and reduced constraint costs.

Proposer’s assessment against SQSS Objectives	
Relevant Objective	Identified impact
(a) facilitate the planning, development, and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;	Positive Faster and more cost-effective network upgrades and maintenance. Improved reliability and affordability for consumers. Better coordination across the industry by means of a joint agreement of the relevant stakeholders on the standard assessments to manage operational risks.
(b) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;	Neutral The proposal is expected to support improved coordination and risk assessment, which may contribute to maintaining appropriate levels of system security, quality of electricity supply,

¹² NESO case study repository, NAP Team, Case Study 2, Ignoring Bar Trips on a Specific Location, July 2024, Confidential, consulted for the purposes of this proposal only. NESO case study repository, NAP Team, Case Study 1, Ignoring DC Trips on a Specific Location, July 2024, Confidential, consulted for the purposes of this proposal only.

¹³ Transmission Acceleration Action Plan, Consultation Report, 2025 pg. 38-48 5, OP3.

¹⁴ Transmission Acceleration Action Plan, Consultation Report, 2025, Paragraphs 4.6 4.7, 6.4, 6.5

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	and safe operation of the NETS. These outcomes are consistent with the objectives of the reform but are contingent on effective implementation and stakeholder collaboration.
(c) facilitate effective competition in the generation and supply of electricity, and (as far as consistent therewith) facilitating such competition in the distribution of electricity; and	Positive Facilitates a more open and flexible system, making it easier for new and existing companies to compete in generating and supplying electricity. Encourages more competition in electricity generation and supply, making it easier for new entrants to participate, driving innovation and potentially lowering costs for consumers.
(d) facilitate Licensees to comply with any relevant obligations under Assimilated law	Neutral

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 modification will improve safety and reliability by allowing essential works and upgrades to be planned and delivered more efficiently, while still maintaining strict assessments and agreed mitigations. This ensures the system remains secure and resilient, reduces unnecessary delays, and supports a reliable electricity supply for consumers. Any increase in operational risk is carefully managed through joint assessment processes.
Lower bills than would otherwise be the case	Positive The modification will help lower consumer bills by enabling essential upgrades and maintenance to be delivered more efficiently and with fewer delays. This reduces unnecessary constraint costs and project overruns, leading to a more cost-effective electricity system. Savings from improved

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	planning and flexibility are passed on to consumers through lower network charges.
Benefits for society as a whole	Positive The modification will benefit society by supporting a faster transition to a cleaner, more reliable, and cost-effective electricity system. It enables timely delivery of essential upgrades and new connections, helping to meet climate goals, boost economic growth, and ensure a secure energy supply for everyone. Improved planning and flexibility also reduce disruption and costs, delivering broad social and environmental benefits.
Reduced environmental damage	Positive The modification will help reduce environmental damage by enabling faster and more efficient delivery of network upgrades that support renewable energy connections and reduce reliance on fossil fuels. Improved planning and flexibility also minimise unnecessary delays and resource use, lowering the overall environmental footprint of electricity transmission projects.
Improved quality of service	Positive The modification will improve quality of service by enabling faster and more reliable delivery of network upgrades and maintenance. This reduces the likelihood of unplanned outages, ensures a more stable electricity supply, and allows consumers to benefit from a higher standard of service. Enhanced planning and flexibility also mean issues can be addressed more proactively, further supporting consistent and dependable service.

When will this change take place?

Implementation date

Target date: Q4 2026

Date decision required by

A soon as possible.

Implementation approach

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The systems and processes already exist but may require revision as part of the Workgroup discussion, to enable the coordinated and transparent application of the updated security standard. However, this should take place within the STC. Implementation will need to be co-ordinated and communicated with all affected parties.

Proposer's justification for governance route

Standard Governance modification with assessment by a Workgroup to discuss the rationality for the modification to risks mitigations.

Interactions

☒ Grid Code ☐ BSC ☒ STC ☐ CUSC
☐ European Network ☐ Other ☐ Other
 Codes modifications

This Proposal is part of a broader programme of work under SAR and is expected to interact with other code modifications. Concurrent changes to the STC and Grid Code are being considered to ensure alignment across the industry's technical and governance frameworks. These interactions are being actively scoped and coordinated to support a consistent and efficient implementation pathway, with warm-up presentations and stakeholder engagement already underway across all relevant Panels.

Acronyms, key terms, and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CP30	Clean Power 2030
CUSC	Connection and Use of System Code
DNO	Distribution Network Operator
NAP	Network Access Policy
NESO	National Energy System Operator
NETS	National Electricity Transmission System

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OFTO	Offshore Transmission Owner
SAR	System Access Reform
SQSS	Security and Quality of Supply Standards
STC	System Operator Transmission Owner Code
TO	Transmission Owner

Annexes

Annex	Information
Annex 01	GSR035 Draft Legal Text
Annex 02	GSR035 Case Studies

Reference Materials

- [Clean Power 2030 Action Plan](#)
- [Electricity Networks Commissioner – Companion Report Findings and Recommendations](#)
- NESO: National Access Policies, Case Study Repository, NAP Team, Case Study 1 and Study 2, Ignoring DC Trips on a Specific Location. Confidential, consulted for the purposes of this Proposal only.
- [System Access Reform](#)
- [Transmission Acceleration Action Plan](#) – Government Responses to the Electricity Networks Commissioner, 2023
- [Transmission Acceleration Action Plan](#)