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

Workgroup Meeting 5

Friday 23 October 10am

Online Meeting via Teams

NESO
National Energy System Operator

WELCOME



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Agenda

Topics to be discussed	Lead
Workgroup Expectations, Roles and Membership	Chair
Objectives and Timeline	Chair
Protection Engineers Q&A Update	Chair
Workgroup Consultation Response Review	All
Updated Draft Legal Text Discussion	All
Terms of Reference Review	All
Action Log Update	Chair
Any Other Business and Next Steps	Chair

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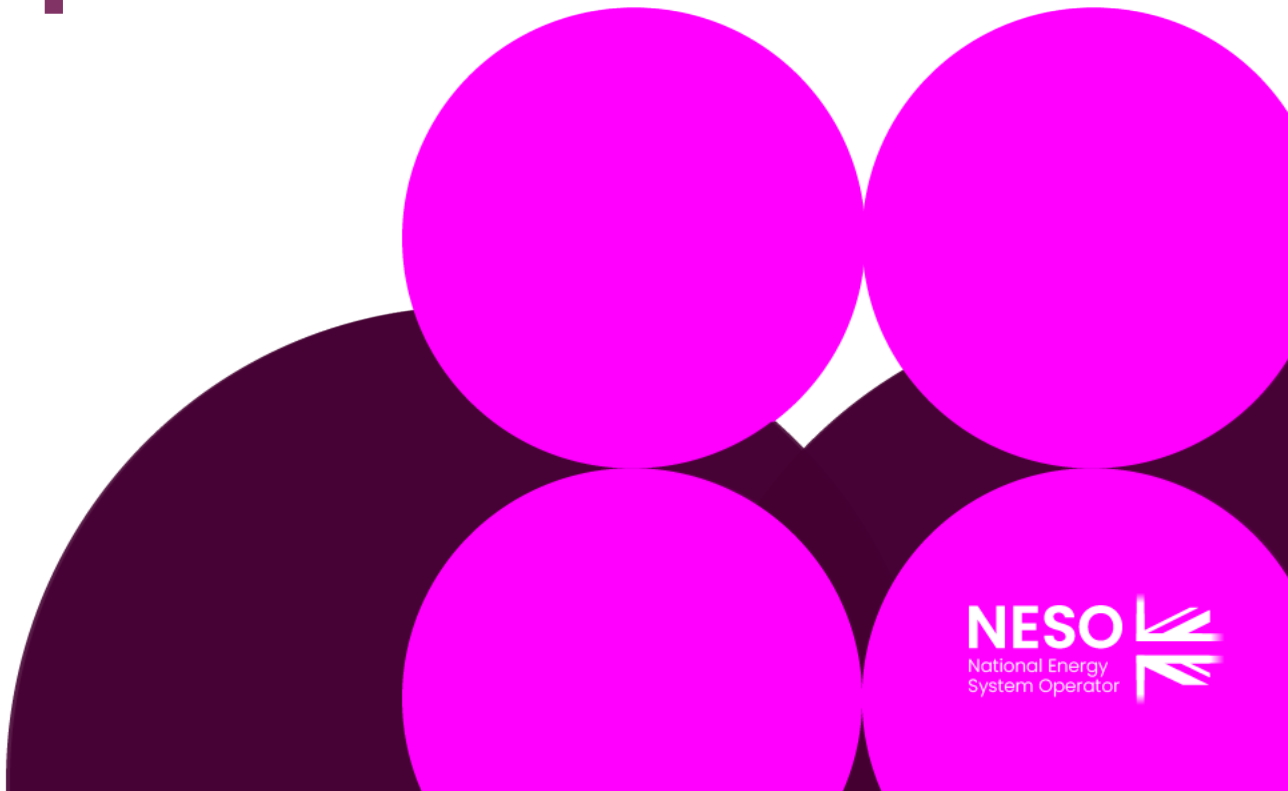
Workgroup Expectations, Roles and Membership

Claire Goult – NESO Code Administrator



Expectations of a Workgroup Member

- Contribute to the discussion
- Be respectful of each other's opinions
- Language and Conduct to be consistent with the values of equality and diversity
- Do not share commercially sensitive information
- Be prepared - Review Papers and Reports ahead of meetings
- Complete actions in a timely manner
- Keep to agreed scope
- Email communications to/cc'ing the .box email

Your Roles

- Help refine/develop the solution(s)
- Bring forward alternatives as early as possible
- Vote on whether or not to proceed with requests for Alternatives
- Vote on whether the solution(s) better facilitate the Code Objectives

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Workgroup Membership

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

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Workgroup Membership

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

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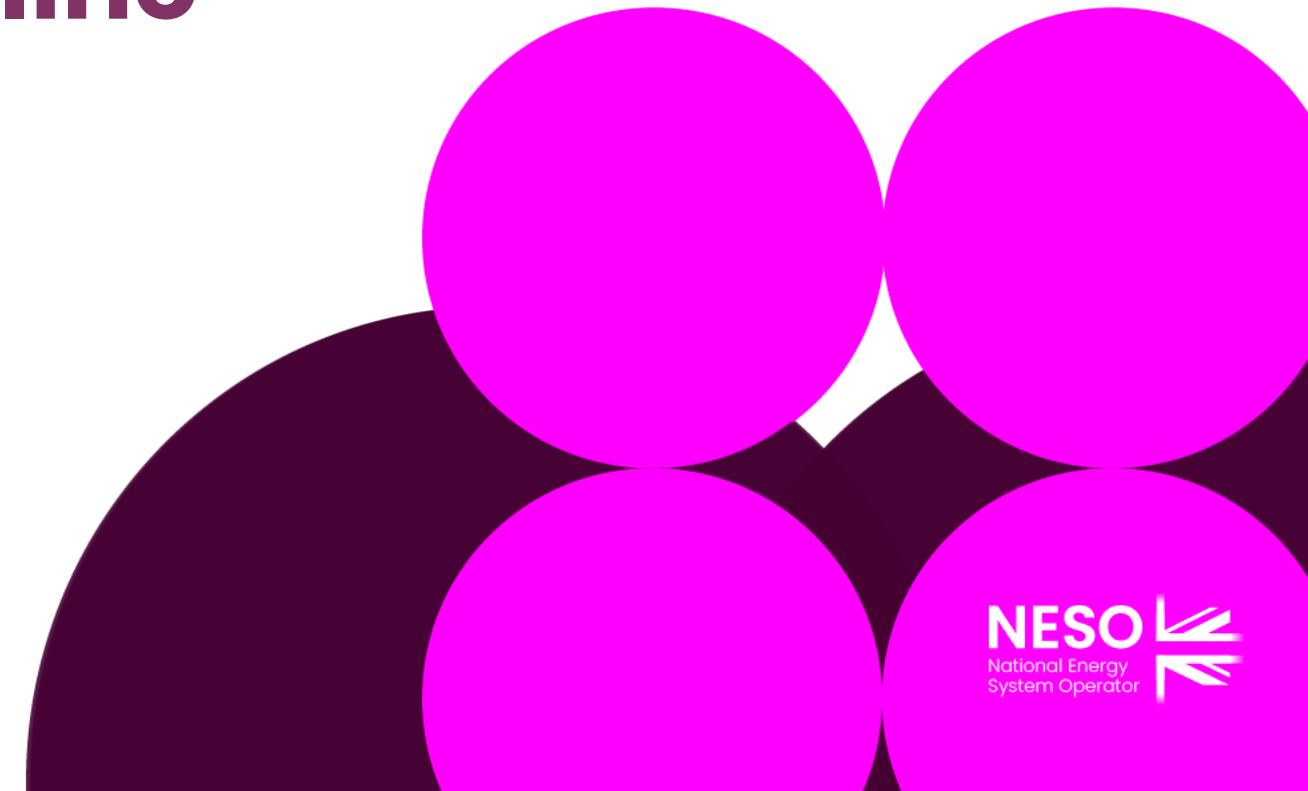
Objectives and Timeline

Claire Goult – NESO Code Administrator



Timeline

Objectives

To review the Workgroup Consultation Responses and legal text update discussion

Workgroups		
Workgroup 1	11 June 2026	Proposer's presentation
Workgroup 2	09 July 2026	Refine Solution
Workgroup 3	06 August 2026	Refine Solution and Legal Text
Workgroup 4	24 August 2026	Finalise WG Consultation
Subgroup	16 September 2026	Protection Engineers Q & A
Workgroup Consultation	**03 September 2026 to 24 September 2026 (15 Business Days)**	
Workgroup 5	23 October 2026	Review consultation responses and legal text update discussion
Workgroup 6	04 November 2026	Update Solution/Legal text
Workgroup 5	03 December 2026	Review and Finalise Legal Text
Workgroup 6	08 January 2027	Finalise Report/Workgroup Vote
Post Workgroups		
Workgroup Report to Panel	**21 January 2027**	**Panel 28 January 2027**
Code Administrator Consultation	**03 February 2027 – 03 March 2027 (1 month Grid Code)**	
Draft Final Modification Report to Panel	22 April 2027	Panel on 29 April 2027
Final Modification Report to Ofgem	11 May 2027	Decision TBC
Implementation Date	TBC	

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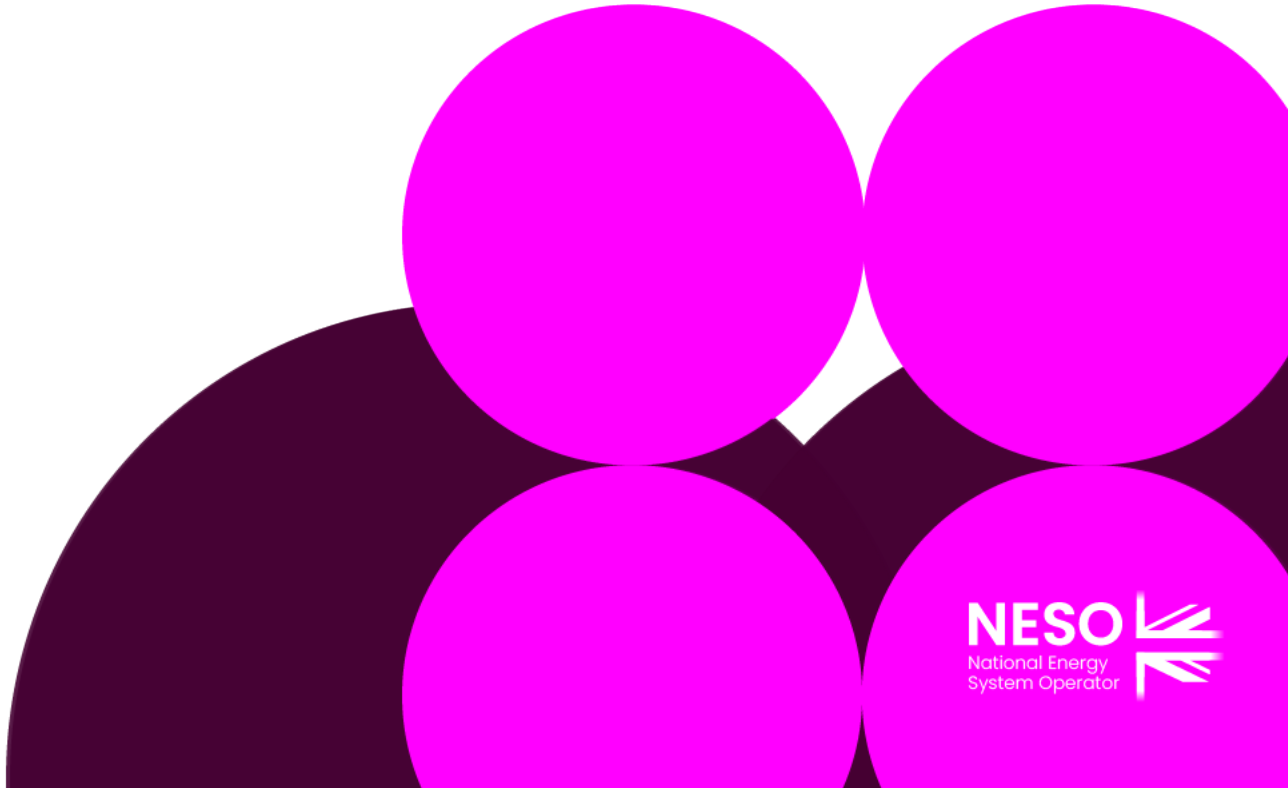
Workgroup Consultation Response Review

All



Respondents

How many responded?

Who Responded?

GC0186 Workgroup Consultation: 10 **non-confidential**, 0 **confidential**.

Organisation Type	Number
Storage	0
Generator	4
Distribution Network Operator	3
Demand	0
Developer	0
Supplier	0
Industry Body	0
System Operator	1
Transmission Owner	3

*** Note – some respondents may tick more than one box**

Breakdown by objective

How did industry feel about GC0186 against each objective?

Objective	Number who believed the original solution better facilitates
(i)	9
(ii)	2
(iii)	9
(iv)	8
(v)	2
None	0

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Grid Code Objectives

Main themes respondents felt the Original solution did or did not better facilitate the objectives.

Seven out of the ten respondents commented.

- Overall, respondents considered that the Original Proposal would better facilitate the Applicable Grid Code Objectives by introducing Regional Restoration Plans, improving coordination and clarity of roles, supporting faster and more efficient restoration, and strengthening system security and resilience.
- Most respondents were supportive, although one respondent raised concerns that retaining and expanding regional differences between Transmission Owners could undermine harmonisation, increase complexity and create inefficiencies for generators and other restoration participants.
- Several respondents also stressed that the final requirements must remain operationally achievable and avoid introducing unassessed additional obligations.

Implementation Approach

All ten respondents supported the implementation approach

Five respondents commented

- Overall, respondents supported the proposed implementation approach in principle, particularly where it is coordinated with related Distribution Code, STC and STCP changes and allows sufficient time for affected parties to understand the final arrangements.
- However, concerns were raised about the lack of detail on participant responsibilities, assurance, testing, evidence and governance requirements, as well as the potential implementation burden and costs for Restoration contracting parties and Secondary Generators
- Respondents also sought clarification on the OTSUW contract cut-off date and stressed that implementation should maintain appropriate technical assurance without creating unintended additional obligations for Generators.

Other comments

Four respondents provided further comments

- The respondents were broadly supportive of the proposal, they raised concerns about proportionality, insufficient detail in Regional Restoration Plans and whether the proposed arrangements would be operationally achievable. Key issues included:
  - Potential for additional governance, assurance, training, compliance and cost burdens
  - Complexity created by regional differences
  - Need for clear roles, resilient control and communication arrangements, and proportionate testing
  - Risk of obligations being imposed without sufficiently detailed plans.

- Respondents also called for further technical assessment to ensure restoration testing and protection arrangements remain technology-neutral and suitable for converter-based and Grid Forming resources.

Possible Alternatives

No official Alternative Requests were raised in the consultation by any of the respondents.

- No official Alternative Requests were raised in the consultation by any of the respondents.
- One respondent commented that they did not wish to raise a Workgroup Alternative Request at this stage.
- Another respondent specifically stated that it did not consider an alternative necessary.

Does the draft Legal Text satisfy the intent of the modification?

Six respondents agreed and one respondent disagreed.

Two respondents partially agreed.

- Several respondents requested further clarification or safeguards, particularly concerning Secondary Generators, DNO switching obligations, restoration-plan responsibilities and operational deliverability.
- Three respondents considered the drafting only partially satisfactory. These respondents identified areas requiring refinement, providing embedded legal-text comments and suggested the need for technology-neutral restoration testing that preserves technical assurance for converter-based and Grid Forming resources.
- One respondent did not consider the text satisfactory, citing undefined terminology and insufficient detail on restoration procedures and training requirements.

Did respondents agree GC0186 has an EBR impact as it proposes to change OC9.4 and BC2?

All ten respondents agreed with the Workgroup assessment that GC0186 has an EBR impact.

- Although one respondent did agree with the EBR assessment of GC0186, their supporting comment stated that the modification **does not** affect the EBR Article 18 terms and conditions, creating an apparent inconsistency.

- Respondents recognised an impact or interaction arising from changes to Operating Code 9 and Balancing Code 2, requested that the affected Article 18 provisions and rationale be clearly identified in the Final Workgroup Report, and emphasised the need to follow the appropriate consultation and approval processes.

Is it appropriate to include the block load switching time in each LJRP, DRZP and RRP rather than specifically refencing a 10-minute switching time on a best endeavours basis in the Grid Code?

Nine respondents agreed

One respondent disagreed

- Supportive respondents felt this would allow timescales to reflect local network topology, operational capabilities, restoration arrangements and necessary preparatory work.
- Support from respondents was generally subject to the times being jointly agreed, operationally assessed or tested, and clearly communicated to affected Generators, including Secondary Generators.
- One respondent preferred an overarching Grid Code baseline supplemented by plan-specific requirements, warning that bespoke times across numerous plans could reduce transparency and create inconsistency.

Will the proposed legal text will not create any additional obligations on secondary Generators?

Six responded agreed

Four responded disagreed

- Six respondents agreed that the legal text would not create additional obligations for Secondary Generators, viewing the changes largely as clarification. However, two of these respondents emphasised that affected Generators should be consulted and provided with sufficient operational information about relevant restoration plans, switching times and block-loading requirements.

- Four respondents considered that the proposal could create additional or de facto obligations. Concerns included increased compliance, assurance, testing, governance and evidence requirements; changes to return-to-service expectations; the extension of requirements from Large Power Stations to Small and Medium Power Stations with CUSC contracts; and obligations arising from restoration plans to which Secondary Generators are not parties. They requested clearer drafting confirming that no new technical capabilities, performance standards or compliance burdens would be introduced.

Is it appropriate to retain some pre-existing regional differences between the practices in NGET with those in SPT and SHET.

Eight responded yes

One responded no

- Eight respondents supported retaining regional differences where these reflect established operational practices, network structures, control capabilities and restoration responsibilities. They considered the approach proportionate, flexible and potentially quicker and more cost-effective than imposing identical arrangements, provided that remaining differences are clearly justified and documented to avoid ambiguity during restoration.
- One respondent opposed regional differences because they increase compliance, training and governance complexity for parties operating across multiple regions.
- One respondent was unable to assess their value without clearer information about what the differences are and why they exist.

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Should the solution explore moving to a fully harmonised approach between NGET, SPT and SHET?

Two respondents agreed

Seven respondents disagreed

- Two Respondents supported exploring greater harmonisation, arguing that it could improve transparency, reduce complexity and costs, and provide greater certainty for Restoration Contractors and Secondary Generators. However, one stressed that operational effectiveness should take priority and justified regional differences could remain.
- Seven respondents did not support pursuing full harmonisation. They considered the current regional arrangements effective and proportionate, and warned that harmonisation could increase costs, require significant investment in systems, training and processes, create operational disruption, and add interfaces during time-critical restoration.
- Several respondents supported future harmonisation only where it delivers clear operational benefits, is supported by a full cost-benefit assessment, or is progressed separately without delaying GC0186.

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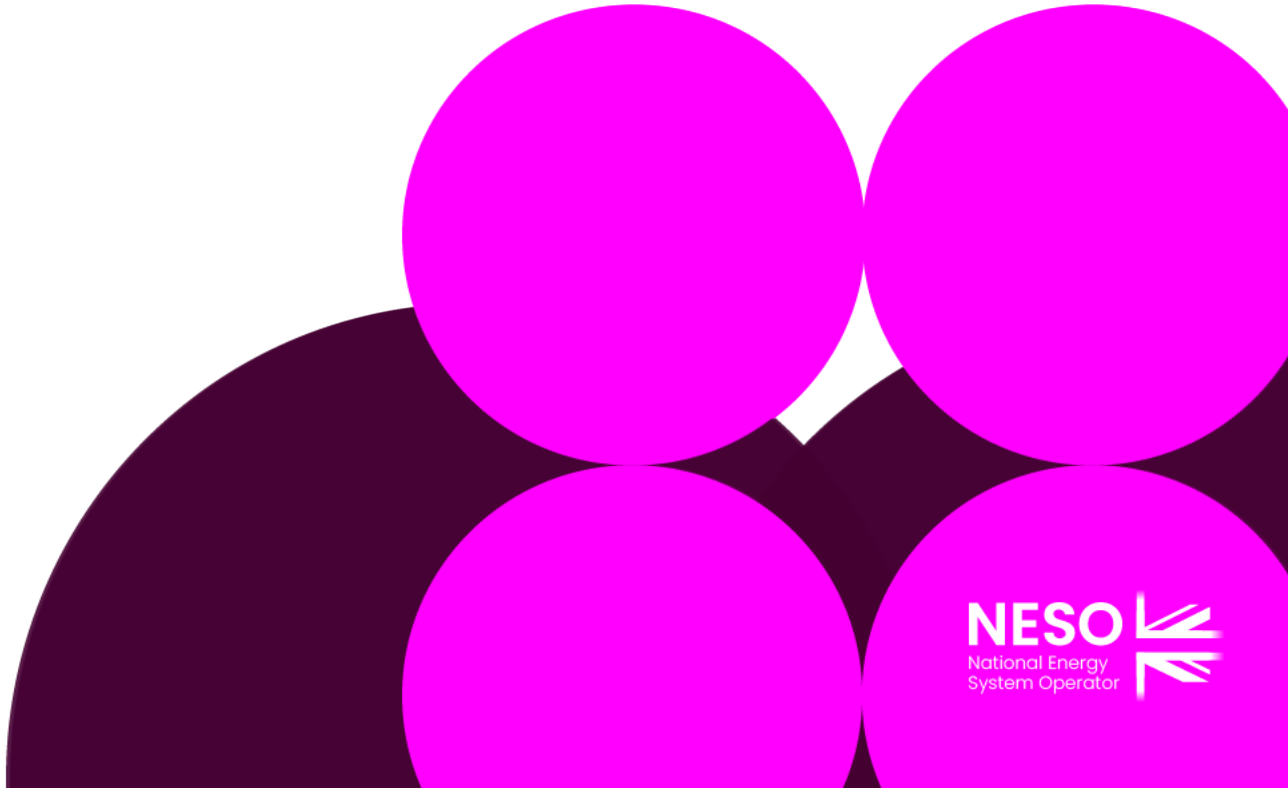
Updated Draft Legal Text Discussion

All



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Terms of Reference Review

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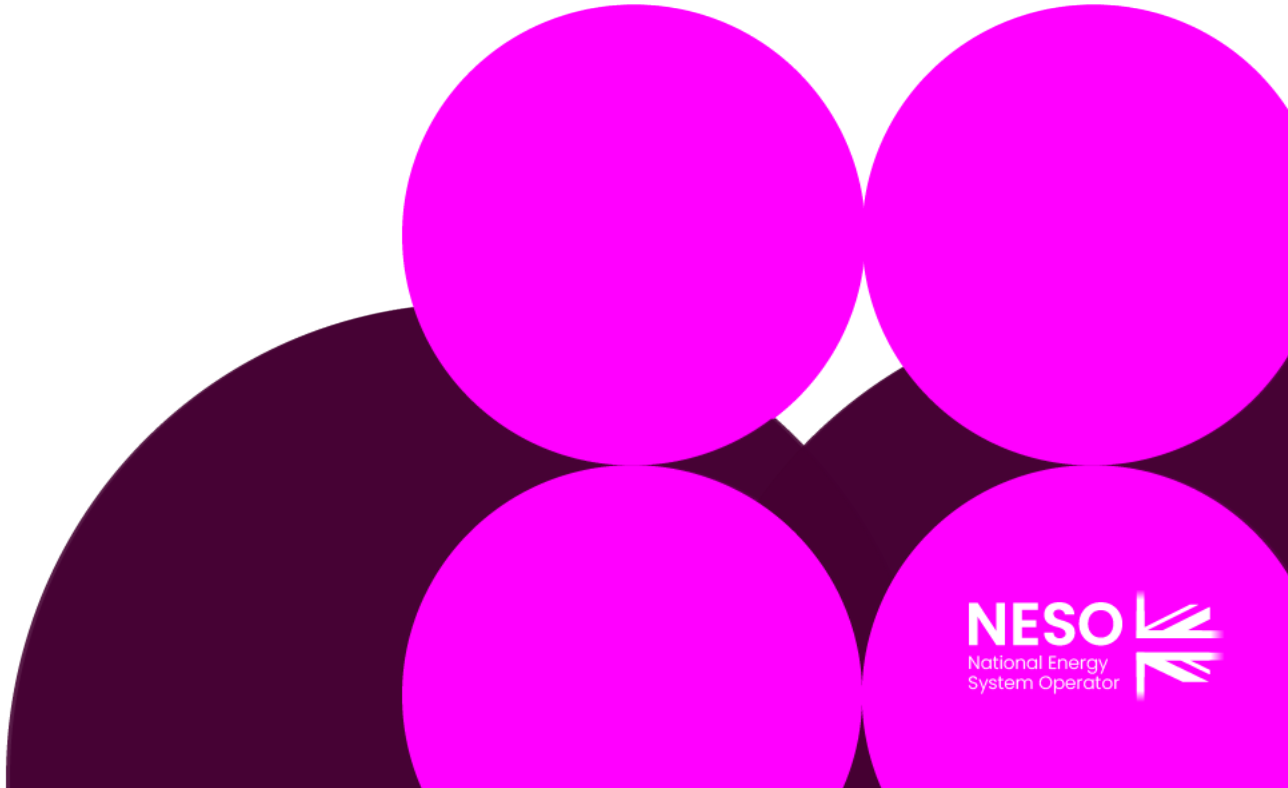

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Terms of Reference

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

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Terms of Reference

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

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t) Consider whether there are any changes required to the Distribution Code (DCode), particularly DOC9.
u) Consider whether a cost recovery mechanism is required for impacted parties as a result of this proposal.
v) Consider whether clarifications proposed to be introduced by GC0186 could be perceived as being more onerous than existing GCode requirements in introduced in GC0156.

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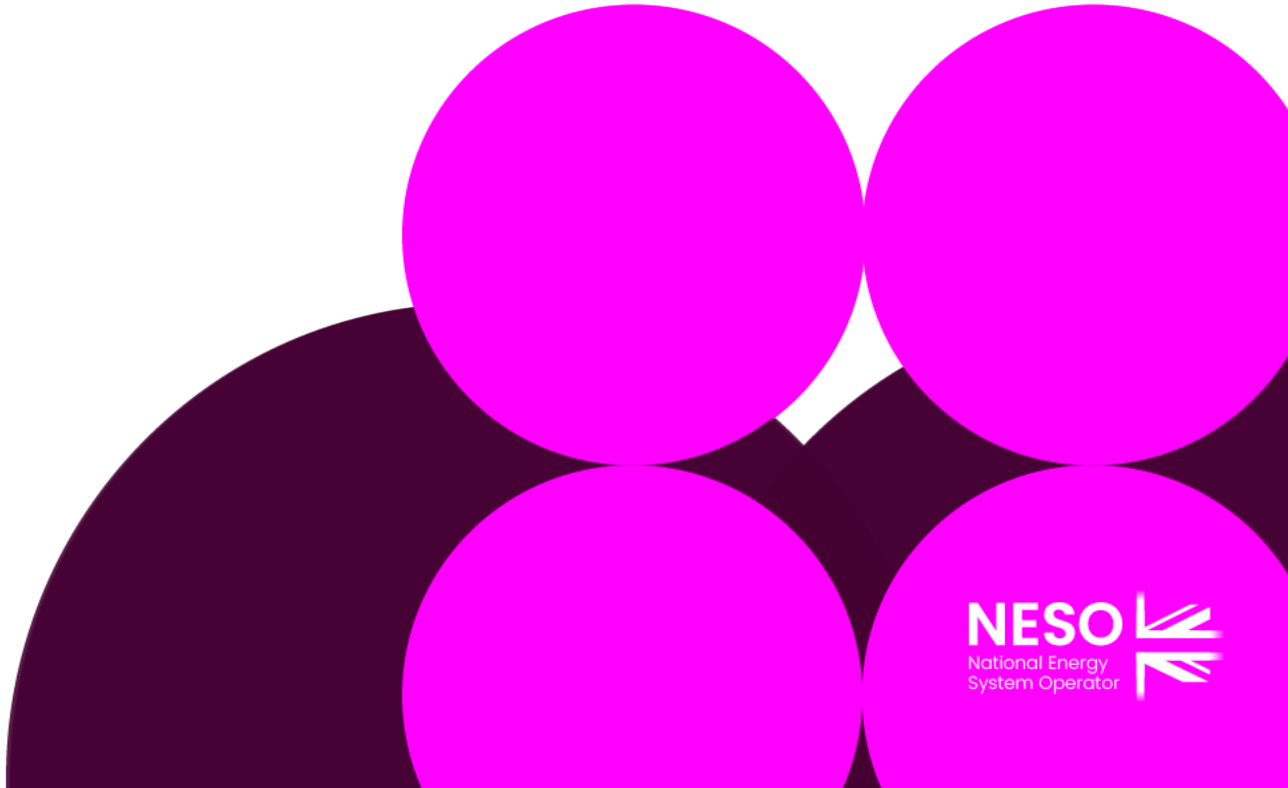
Action Log Update

Claire Goult – NESO Code Administrator



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Action Log Review

Action Number	Workgroup Raised	Owner	Action	Due by	Status	Latest
12	WG3	AJ	Amend the legal text review slides to correct the wording around transmission LGRPs, anchor providers and top-up providers, making clear that the legal text retains flexibility for anchor plus top-up arrangements where required.	WG4	Closed	
13	WG?	All	Review the legal text and draft consultation document and provide comments.	19 August 2026	Close	
14						
15						
16						
17						
18						

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Any Other Business

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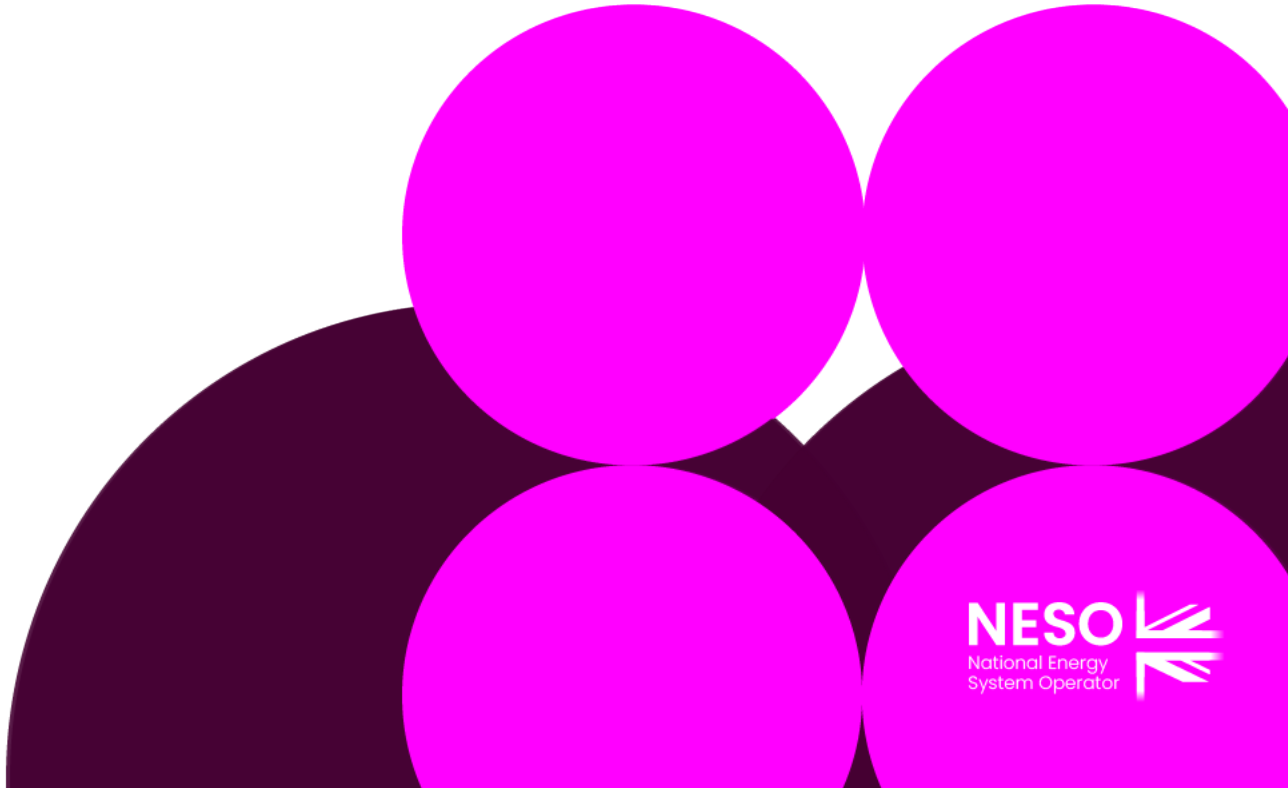

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Next Steps

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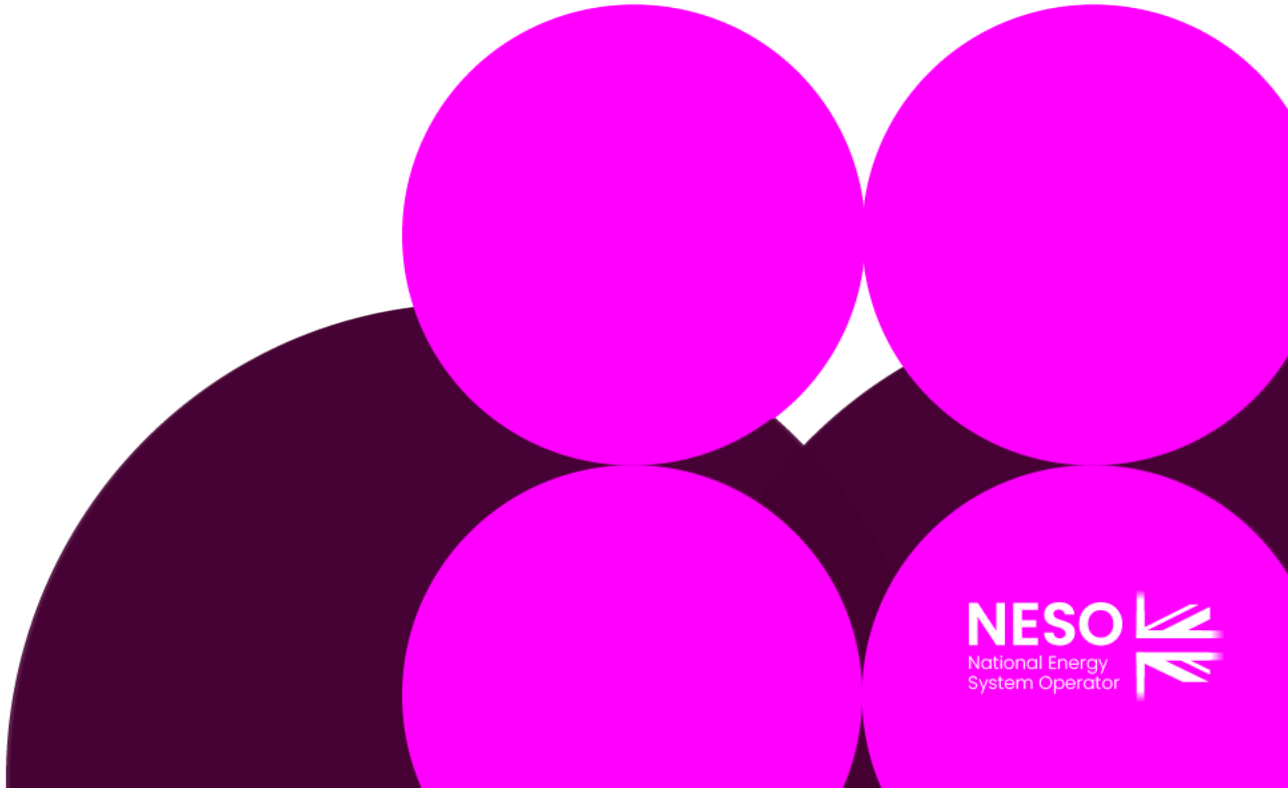

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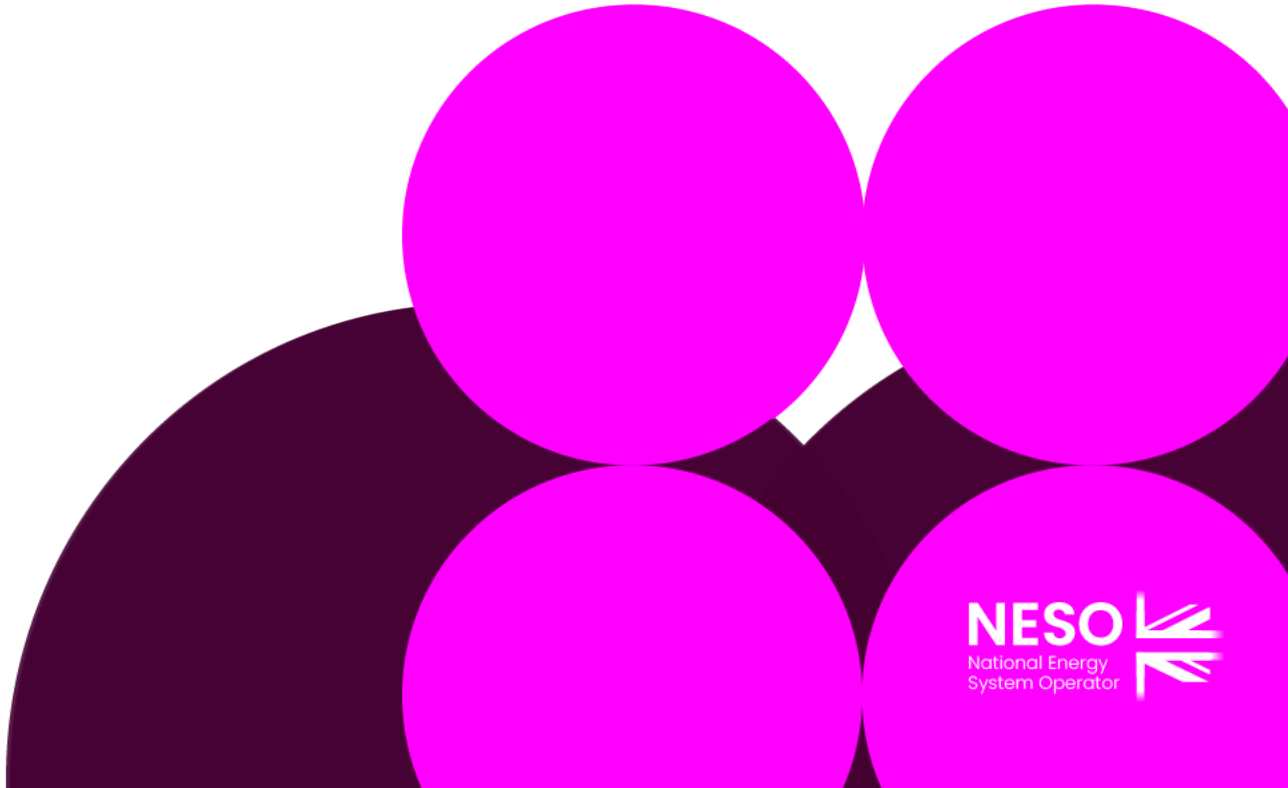
Appendix



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What is the Alternative Request?

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

What do I need to include in my Alternative Request form? The requirements are the same for a Modification Proposal you need to articulate in writing:
- a description (in reasonable but not excessive detail) of the issue or defect which the proposal seeks to address compared to the current proposed solution(s);
- the reasons why the you believe that the proposed alternative request would better facilitate the Applicable Objectives compared with the current proposed solution(s) together with background information;
- where possible, an indication of those parts of the Code which would need amending in order to give effect to (and/or would otherwise be affected by) the proposed alterative request and an indication of the impacts of those amendments or effects; and
- where possible, an indication of the impact of the proposed alterative request on relevant computer systems and processes.

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

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

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Can I vote? And What is the Alternative Vote?

To participate in any votes, Workgroup members need to have attended at least 50% of meetings. The vote shall be decided LIVE by simple majority of those present at the meeting at which the vote takes place (whether in person or by teleconference)

Stage 1 – Alternative Vote

- Vote on whether Workgroup Alternative Requests should become Workgroup Alternative CUSC Modifications.

- The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

- **Should the majority of the Workgroup OR the Chair believe that the potential alternative solution may better facilitate the CUSC objectives than the Original then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM)** and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

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