

Public

Grid Code Modification Proposal Form

GC0191: System Access Reform changes to Operational Planning and Data Provision (OC2) to support Network Access Planning Arrangements

Overview: This modification seeks to assess and implement any consequential amendments to OC2 arising from the outcomes of System Access Reform (SAR) programme. This modification seeks to clarify User responses to outage notifications including response triggers, deadlines and treatment of non-response. It will also implement consequential System Access Reform changes, including information requirements supporting a probabilistic risk assessment (OCRA).

Modification process & timetable

1	Proposal Form 29 October 2026
2	Workgroup Consultation 10 June 2027 – 30 June 2027
3	Workgroup Report 26 August 2027
4	Code Administrator Consultation 06 September 2027 – 24 September 2027
5	Draft Final Modification Report 28 October 2027
6	Final Modification Report 10 November 2027
7	Implementation 2027

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: High impact

NESO, Transmission Owners, Generators, Interconnector Owners, Distribution Network Owners and Large Demand Customers, Large embedded Generators

Modification Category: Cross Code Change

Proposer's recommendation of governance route Standard Governance modification with assessment by a Workgroup

Proposer's view on modification priority: High

Who can I talk to about the change?

Proposer:

Steve Baker
Stephen.baker@neso.energy

Code Administrator Contact:

Ayo Bammeke
ayo.bammeke@neso.energy

Public

Contents

What is the issue?	3
Why change?	5
What is the Proposer's solution?	6
What is in and out of scope?	8
Draft legal text	9
What is the impact of this change?	9
Proposer's assessment against Grid Code Objectives	9
Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories	11
When will this change take place?	13
Implementation date:.....	13
Proposer's justification of Implementation date:	13
Date decision required by	13
Implementation approach	13
Proposer's justification for governance route	13
Interactions	16
Industry engagement and feedback	17
Acronyms, key terms and reference material	18
Reference material	19

Public

What is the issue?

The Grid Code (OC2) was developed against legacy outage planning arrangements and does not fully reflect the future outage planning framework being considered through the System Access Reform programme. Consistent with the recommendations of the Winsor Review¹ and the Transmission Acceleration Action Plan (TAAP)², amendments are required to establish an enduring governance framework for outage planning and access management. This modification also introduces consequential changes required to support the implementation of *GSR035 Review of the Operational Requirements on the Onshore Systems*, including reinforcing obligations to provide information required for the Operational Criteria Relaxation Assessment (OCRA) process, thereby ensuring consistency between related industry Code modifications.

The reasons underlying the Proposal are explained in the following paragraphs.

Issue 1: User responses during outage planning

Two actions from the Transmission Acceleration Action Plan are particularly relevant for this modification based on inefficiencies identified in the outage planning process when producing an action plan in response to the Electricity Commissioners Report recommendations.

TAAP Action	Explanation
OP4_7b	Review existing codes to ensure that there is a fair mechanism for NESO to complete its Outage Planning processes in the absence of timely response from affected Users.
OP4_20b	Consider modifying the Codes to allow NESO to "Tell" rather than "Request" an outage after the consultation period has lapsed.

Table 1. Actions from the Transmission Acceleration Action Plan (TAAP)

¹ <https://www.gov.uk/government/publications/accelerating-electricity-transmission-network-deployment-electricity-network-commissioners-recommendations>

² <https://www.gov.uk/government/publications/electricity-networks-transmission-acceleration-action-plan>

Public

NESO has found that late or absent responses from Users can result in postponed outages, create uncertainty in outage delivery or result in delays when system access windows are limited. Evidence for the impact of User late responses was presented at the October 2026 Grid Code Development Forum (GCDF).³

It was identified that 40% of the outages delivered in Financial Year 2025/26 required User liaison, and out of this 40% of total outages NESO found evidence that 62% had no evidence of a response.

Root cause analysis identified the following contributing factors to this problem:

1. User contact information held by NESO's Network Access Planning (NAP) team is not always accurate.
2. Users may not be sufficiently aware of the requirements of the OC2 deadlines and why they are important across industry.
3. The requirements in OC2 for Users to respond should be clarified, as they may currently be interpreted as being optional.
4. Users may be aware of the OC2 requirements and deadlines but may fail to respond to NESO notifications for other reasons (e.g. resource constraints).
5. Some NESO communications may not make it clear that a response is required from Users, and who the NESO point of contact is for a response.

Items (1). (2) and (5) above are primarily matters for improvement through reviews of the Business-As-Usual (BAU) processes. This modification focuses on items (3) and (4) above, which relate to the clarity of User obligations under OC2 and the impact of no responses within the required timescales.

Issue 2: Consequential SAR, GSR035 and OCRA change

After the recommendations of the Electricity Network Commissioner in 2023, NESO has raised SQSS modifications to optimise the outage planning process. In particular, the modification GSR035 seeks to introduce a new risk-based operational framework under SQSS paragraph 5.11.3 through which limited relaxations may be applied to specific events where a robust process identifies that securing the event would be significantly disproportionate to the intrinsic risk of such an event. OC2 is the section within the Grid

³ <https://www.neso.energy/document/388056/download>

Public

Code governing operational planning, outage coordination and data provision for Users whose plant, apparatus or system conditions may affect the NETS outage plan. Without a consequential modification giving visibility to GSR035 through OC2, actions and obligations will remain unclear.

Why change?

This modification is driven by two related issues identified through the operation of the current outage planning arrangements and the implementation of the wider System Access Reform programme. First, experience has demonstrated that the existing provisions within OC2 do not always provide sufficient clarity regarding when Users are required to respond to outage planning notifications, the applicable timescales for response, and the treatment of non-response, creating uncertainty and inefficiencies within the outage planning process. Secondly, consequential changes are required to ensure that OC2 remains aligned with the evolving System Access Reform framework, including the operational implementation of GSR035 and the associated Operational Criteria Relaxation Assessment (OCRA) arrangements. The following sections explain the rationale for each issue in turn and set out why changes are required, while also identifying matters that have been raised by stakeholders but are not within the scope of this modification.

Issue 1. Reasons for change

Following recommendations from the Winsor Report and the Transmission Acceleration Action Plan, the System Access Reform programme is introducing changes to network access planning and outage coordination arrangements. A review of OC2 is required to ensure the Grid Code remains fit for purpose under the future framework.

The changes introduced by this proposed modification cannot be deferred indefinitely, as the increasing number of Users connected to the system is creating greater operational complexity. This growing complexity is already giving rise to additional system access challenges, while levels of User engagement remain limited. As a result, valuable system access opportunities can be missed, reducing the efficiency of the connection and access process.

Public

Issue 2. Reasons for this request to change

The change is required because the GSR035 SQSS amendments create a risk-based route for limited operational relaxation, but the practical application of that route depends on reliable OC2 information being available within the outage planning process. The Transmission Acceleration Action Plan identifies that increased system access, improved outage coordination, and reduced short-term plan instability are necessary to support accelerated network build and Clean Power 2030 delivery. This requires a consequential Grid Code change providing the operational interface needed to ensure that the proposed OCRA assessments are not detached from the OC2 obligations that govern outage coordination, User data, study assumptions, operational notifications and liaison with affected parties.

What is the Proposer's solution?

This modification seeks to clarify User response requirements and introduce appropriate timeframes for such responses during outage planning processes, as captured in OC2 in the Grid Code. It seeks to introduce or clarify consistent notification, review and response obligations across the Network Access Planning process. Under the proposed framework, where NESO issues an outage planning notification, plan or revision, or requests information from an affected User, OC2 would make clear where a positive response is required. A response would confirm the User's position on the relevant notification or request, including the provision of any information requested by NESO and, where applicable, identification of any concerns with the proposed outage arrangements.

The requirements would apply across the relevant OC2 planning horizons, with different response timescales potentially applying according to the stage of outage planning. The precise triggers, response requirements and timescales will be developed and evaluated through the Workgroup, taking account of the existing obligations and planning milestones already contained within OC2.

The modification will also consider the appropriate treatment of non-response. This may include consideration of a default position where a User does not respond within the applicable timescale; however, whether such a default is appropriate, its effect and any necessary safeguards will be determined through the Workgroup process.

Public

Potential Solution Elements:

- Outage notifications, plans and revisions issued by NESO that require a positive User response;
- Identification of affected Users required to review and respond;
- Clarification of what constitutes an appropriate response including any information or concerns that the User is required to provide;
- Defined response periods, which may differ between the relevant OC2 planning stages;
- Clarification of the trigger from which the applicable response period begins;
- The treatment of non-response, including how the outage planning process may proceed where no response is received; and
- Alignment of these requirements with existing OC2 obligations and planning milestones, to avoid duplication or conflicting requirements

The specific grounds for each solution are in line with this justification as follows:

Issue 1. User response during outage planning

The detailed response triggers, applicable timescales, treatment of non-response and associated legal text will be developed and evaluated through the Workgroup process.

- OC2.3.1.3. Operational Planning Phase (years 2 to 5 inclusive ahead)
- OC2.3.1.4 Operational Planning Phase (1 year ahead)
- OC2.3.1.5 Operational Planning Phase (year 0 down to programming phase)
- OC2.3.1.6 Programming Phase

Initial draft legal text is being developed covering the relevant provisions of OC2, including OC2.3.1.3 to OC2.3.1.6. The draft is intended to provide the Workgroup with a starting point for assessment and will be presented for review, challenge, and further development through the Workgroup process. The detailed response obligations, applicable timescales, treatment of non-response and any necessary consequential amendments will therefore be subject to Workgroup consideration before the legal text is finalised.

Public

The modification is primarily focused on amendments to OC2. Any consequential amendments to other sections of the Grid Code identified as necessary to give effect to, or maintain consistency with, the agreed OC2 solution may also be considered within scope.

Issue 2. Consequential SAR, GSR035 and OCRA change

For issue 2, the Proposer's solution is to introduce provisions that require each affected User to provide complete, accurate and timely operational planning and related information; to notify NESO of material changes promptly; to cooperate with NESO on outage coordination, operational planning and OCRA assessments (SQSS paragraph 5.11.3 as developed under GSR035). That will permit NESO, where information is incomplete, late or inconsistent, to request correction and to use reasonably available information while documenting any assumptions. The drafting is intended to operate as a consequential Grid Code implementation layer for GSR035, rather than as a separate relaxation power or a change to the SQSS risk thresholds.

What is in and out of scope?

The scope of this modification is determined by the two issues set out above. The following matters, while raised by stakeholders as potential areas for change, are not within the scope of this modification.

Issue 1. User response during outage planning

This modification focuses on clarifying and, where necessary, strengthening User response obligations within the OC2 outage planning process, including the applicable response requirements, timescales, and the appropriate treatment of non-response. The modification will consider how the outage planning process may proceed where a required response is not received, together with any necessary safeguards and limitations.

The wider principle of NESO moving from "requesting" to "telling" an outage (TAAP action OP4_20b in Table 1 above) is not proposed as a predetermined outcome of this modification. The relevant TAAP actions are referenced because they provide important context for the identified defect and the need for a clear and fair mechanism where

Public

timely User responses are not received. Any solution developed by the Workgroup will need to remain within the defect and scope approved by the Panel.

Issue 2. Consequential SAR, GSR035 and OCRA change

In scope: Consequential amendments to OC2 to support the operational implementation of GSR035, including related information provision, User cooperation, correction of incomplete or inconsistent data, and treatment of assumptions.

Out of scope: Amendments to SQSS security criteria, the Authority-approved relaxation methodology itself (OCRA assessments), balancing market arrangements, CUSC commercial rights, or any retrospective approval of operational relaxations.

Draft legal text

Suggested legal text will be provided ahead of the first Workgroup for Workgroup members to consider and develop.

What is the impact of this change?

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 This change introduces clearer outage planning information exchange and response obligations across the Network Access Planning process. This is expected to improve coordination between NESO and Users, support more efficient outage management and facilitate implementation of the SAR arrangements.
(ii) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate	Neutral

Public

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)	The modification is not intended to alter access rights, commercial arrangements, or competitive positions. However, the Workgroup will consider whether the proposed response obligations and timescales could have differing impacts on Users depending on factors such as their size, resources or operational arrangements, and whether any safeguards or adjustments are required to ensure the arrangements, are proportionate and do not adversely affect 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 modification promotes more effective outage coordination through defined notification and response requirements supporting timely identification and resolution of potential outage conflicts and improving the quality of operational planning information available to NESO and Users.
(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	Neutral This modification is not intended to introduce new licence obligations or regulatory requirements. It supports implementation of arrangements developed through the wider SAR programme and provides greater

Public

	clarity regarding operational planning obligations within the Grid Code.
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive Introduces greater clarity and consistency in respect of the outage planning processes response obligations and associated timeframes. Expected to reduce ambiguity, improve administration of OC2 arrangements, and support more consistent engagement by affected parties. To improve confidence in the outage plan and ensure all parties are aware when impacted under outage conditions.

* 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 An improved system for the management of outages will improve reliability of outage planning, notification, and response arrangements, support better coordination of outages and improve the quality of operational planning information available.

Public

Lower bills than would otherwise be the case	Neutral The modification is not expected to have a direct impact on consumer bills. Improved certainty in outage planning may create opportunities for more efficient outage coordination, including outage nesting and reduced postponement of outages, which could avoid costs that might otherwise ultimately be borne by consumers. However, the scale of any such benefit has not been quantified and will depend on how the arrangements operate in practice. On that basis, the Proposer considers the impact against this category to be Neutral at this stage.
Benefits for society as a whole	Positive Improved coordination of outage planning should support more efficient use and development of the transmission system helping to facilitate timely network reinforcement and wider decarbonisation objectives.
Reduced environmental damage	Neutral Does not directly alter environmental obligations or outcomes. However, improved outage coordination may indirectly support more efficient network utilisation and implementation of wider SAR arrangements.

Public

Improved quality of service	Positive Improved transparency, predictability, and consistency for industry participants engaged in outage planning processes.
-----------------------------	---

When will this change take place?

Implementation date:

10 days after decision from the Authority.

Proposer's justification of Implementation date:

As soon as practicable. Ideally the implementation date for this modification will align with the delivery timetable for System Access Reform and GSR035. Timely implementation is required to ensure the necessary outage planning and OCRA-related provisions are in place to support wider SAR reforms and avoid creating a dependency on critical programme milestones.

Date decision required by

To be determined through the Workgroup process.

Implementation approach

The proposed OC2 update will support existing processes. No further Grid Code changes are currently anticipated for implementation, although related changes to the STC/STCP arrangements may be progressed separately. Implementation may also require updates to existing systems, processes, operational procedures, contact details and communication and data exchange arrangements.

Proposer's justification for governance route

This change impacts a broad range of Grid Code Users and proposes new or clarified obligations and response timeframes across outage planning processes. Industry assessment through a Workgroup is therefore appropriate to ensure that the solution is robust, proportionate and informed by affected stakeholders. Given the potential material impact on Users' operational arrangements and on the operation and

Public

coordination of the transmission system, the Proposer considers that the modification should be progressed under Standard Governance and determined by the Authority rather than through Self-Governance.

Proposer's view on prioritisation

Proposers must provide an initial rationale for how the Modification aligns with the three Prioritisation Criteria; this will inform the Grid Code Panel's determination of the appropriate Prioritisation Category, which may be reviewed if circumstances materially change.

Prioritisation Criteria	Impact
Alignment with the Strategic Direction Statement Please explain how this modification aligns to the delivery of government policies and developments relating to the energy sector as set out in the <u>Strategic Direction Statement</u> (SDS). This should include an assessment of whether the modification supports delivery of policy priorities set out in the 'Act now', 'Think and plan' or 'Listen and wait' SDS categories.	Strong System Access Reform is specifically identified in section 6.1 of the Strategic Direction Statement (page 38) and classified in the "Act now" category. GC0191 supports delivery of System Access Reform by addressing identified gaps in the OC2 outage planning arrangements and developing clearer user response requirements to support Network Access Planning. In doing so, the modification helps facilitate more effective implementation of access reform and supports the SDS objective of enabling the timely and efficient connection and use of the electricity network. By clarifying outage planning obligations, strengthening User response requirements, and introducing consequential changes to support Network Access Planning and the Operational Criteria Relaxation Assessment (OCRA) processes, this modification strongly aligns with Strategic Direction Statement Policy Area 6.1 "Act now" to increase system access. In doing so, it supports the Strategic Direction Statement objective of enabling faster network build, improving access to the

Public

	transmission system, and facilitating the timely delivery of the infrastructure required for Clean Power 2030 and wider energy transition objectives.
Complexity Please explain the expected the level of industry resource, knowledge and/or time required to progress this modification through to implementation. This can include the scope of process or system change required to facilitate the modification, whether cross code changes are required, the input and expertise required from code parties, and the number of consequential changes that would arise from implementation of the modification.	Strong Outage planning is key to an efficient and economic grid. NESO, Transmission Owners, Generators, Interconnector Owners, Distribution Network Owners, large demand customers and large embedded Generators are impacted, and their input is required to understand all consequences of this change. This modification is part of a suite of Code changes supporting the delivery of the System Access Reform programme, including to the SQSS and SO-TO Codes Procedures (STCPs), to date. This Workgroup forms part of the wider System Access Reform programme and has identified interactions with the Security and Quality of Supply Standard (SQSS), including GSR035: System Access Reform – Review of the Operational Requirements on the Onshore Systems, and with System Operator-Transmission Owner Code (STC) arrangements.
Importance Please explain the perceived value, criticality and risk to industry, consumers, and/or other stakeholders of the implementation of the modification, taking account of written guidance that the Authority may provide. This can include its interaction with or enabling of other financial,	Strong This change provides strong value to industry and net zero by de-risking outage planning, thereby improving outage delivery confidence associated with connections and major reinforcements outlined in Clean Power 2030. The proposal is also linked to broader government objectives set out through the Transmission Acceleration Action Plan and System Access Reform. Timely implementation is intended to ensure that the outage planning and information-sharing arrangements are in place before key System Access Reform measures are

Public

regulatory, licence and/or compliance obligations, changes to costs for stakeholders, systemic impacts and potential systemic risk arising from non-implementation, and its cross-code impacts.	delivered. Failure to implement the modification by the anticipated Q2 2027 timeframe could require parts of the wider reform programme to operate without fully aligned Grid Code provisions, increasing delivery risk and potentially constraining the benefits expected from improved network access and outage coordination arrangements.
---	---

Proposer Priority Recommendation

High Priority	Standard Priority
✓ High – These modifications require faster development and resolution than the standard timeline. High priority could include a modification that has not been deemed urgent under existing code urgency processes but still requires development and implementation within a specific timeframe.	□ Standard – Modifications are expected to follow a standard modification timeline. Development may be paused, for example, if the modification is dependent on the outcome of another modification.

Interactions

☐ CUSC ☐ BSC ☒ STC ☒ SQSS
☐ European Network Codes ☐ EBR Article 18 T&Cs¹ ☒ Other modifications ☐ Other

Access Reform has previously raised SQSS modifications:

- GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems; and

Public

- GSR036: System Access Reform: Review of the voltage limits.

And STCP modifications:

- PM0153 System Access Reform. Emergency Return to Service (ERTS): Profiling Review; and
- PM0154 STCP16-1 System Access Reform. Investment Planning Process – Data on Constraint Costs.

Other Code changes may follow.

Industry engagement and feedback

The System Access Reform team⁴ attended the Grid Code Development Forum (GCDF) twice to discuss this change. Feedback at the first presentation at the July 2026 GCDF meeting included:

- A request for data on outage delays, in terms of providing evidence for the case for change;
- Support for the timeliness of this change;
- A request for coordination with Users on developing improvements to this process; and
- Suggestions that NESO reviews processes around User contact details.

During attendance at the second GCDF presentation in October 2026, NESO colleagues presented root cause analysis and provided evidence for the problem and case for change. This summarised that out of 8,100 planned outages in FY2025/26, 3,226 (40%) outages required or awaited responses. NESO identified that 2,007 outages (62%) out of 3,226 outages had evidence of no response received from Users.

GCDF attendees provided feedback on additional contributing factors (e.g. lack of clarity in the Grid Code and on NESO automatic e-mails on the requirement for a User response). Industry stakeholders provided verbal confirmation that this requirement was not well known, and partial requirements were not understood. The discussion also

⁴ <https://www.neso.energy/industry-information/codes/grid-code-gc/grid-code-development-forum-gcdf#Previous-GCDF-meetings>

Public

highlighted potential ambiguity in the OC2 drafting regarding User obligations to respond. Attendees agreed that some of the issues identified will be addressed via changes in the Business as Usual (BAU) processes rather than through Code changes (i.e. up to date User contact details). The discussions with, and feedback from, stakeholders have been helpful in shaping this modification proposal.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BAU	Business as usual
BSC	Balancing and Settlement Code
CP30	Clean Power 2030
CUSC	Connection and Use of System Code
DNO	Distribution Network Operator
EBR	Electricity Balancing Regulation
GC	Grid Code
GCDF	Grid Code Development Forum
NAP	Network Access Planning
NESO	National Energy System Operator
NETS	National Electricity Transmission System
OCRA	Operational Criteria Relaxation Assessment
OFTO	Offshore transmission owner
SAR	System Access Reform
SDS	Strategic Direction Statement
SQSS	Security and Quality of Supply Standards

Public

STC	System Operator Transmission Owner Code
STCP	System Operator-Transmission Owner Code Procedure
TAAP	Transmission Acceleration Action Plan
T&Cs	Terms and Conditions
TO	Transmission Owner

Reference material

- [Clean Power 2030 Action Plan](#)
- [Electricity Networks Commissioner – Companion Report Findings and Recommendations](#)
- [System Access Reform](#)
- [Transmission Acceleration Action Plan](#) – Government Responses to the Electricity Networks Commissioner, 2023
- [Transmission Acceleration Action Plan](#)
- <https://www.neso.energy/industry-information/codes/sqss/modifications/gsr036-system-access-reform-review-voltage-limits>
- [GSR035: System Access Reform: Review of the operational requirements on the Onshore Systems](#)
- [PM0153: System Access Reform. Emergency Return to Service \(ERTS\): Profiling Review. | National Ener...](#)
- [Second preliminary Strategic Direction Statement for industry codes](#)