Public

Code Administrator Meeting Summary

Workgroup Meeting 10: GSR035 System Access Reform- Review of the operational requirements on the Onshore Systems

Date: 21 October 2026

Contact Details

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

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

Key areas of discussion

The Chair welcomed the Workgroup members and observers to Workgroup 10 and gave a brief outline of the agenda.

Objectives and Timeline

The Chair confirmed that the meeting would review the Workgroup non-confidential consultation responses, revisit the Terms of Reference, assess the timeline and its links to the OCRA methodology and related modifications, and agree the next steps for progressing GSR035.

Review of GSR035 Workgroup Consultation Responses

The Chair presented the feedback from six non-confidential Workgroup responses received, to the Workgroup members. One confidential response received had been submitted directly to Ofgem and could not be shared with the Workgroup. Workgroup members queried whether any material concerns could be raised without breaching confidentiality, it was confirmed that the respondent had selected confidential and the response would be treatment as requested.

Question 1: Applicable Objectives

Respondents agreed that GSR035 would better facilitate the applicable objectives, although views differed on which objectives applied. Three selected Objective A, two selected Objectives A and B, and one selected all four objectives. Members could reconsider their assessment at the Workgroup vote.

Question 2: Proposed implementation approach

Four respondents supported the approach; one did not yet support it and one abstained. There was agreement that OCRA should be a controlled exception, with existing SQSS standards remaining the default. However, members remained concerned about supporting the proposal before the OCRA methodology, governance, risk allocation, stakeholder protections, and related code changes were sufficiently developed. Closer alignment between GSR035 and the OCRA development work was agreed as the practical way forward.

Question 3: Further comments

Respondents called for clear governance, accountability, decision rights, stakeholder consent, escalation arrangements, compensation and transparent assessment of costs, benefits, and risks. The Workgroup also sought assurance that OCRA would be used only as a last resort where an outage could not be accommodated through normal system-management measures, rather than as a routine means of reducing constraint costs.

Question 4: Draft legal text

All respondents agreed that the draft legal text satisfied the intent of GSR035. No substantive concerns were raised.

Question 5: Retention of existing SQSS clauses

All respondents supported retaining clauses 5.3 and 5.4 as the normal security baseline and supplementing them with proposed clause 5.11.3. The new provision was viewed as enabling controlled exceptional flexibility while preserving the existing standards.

Question 6: High-level principles in Appendix K

Four of the six respondents supported placing the high-level principles and safeguards in Appendix K, with operational detail in the OCRA methodology. Concerns centred on whether Appendix K was sufficiently robust and whether the OCRA's regulatory status, governance, accountability, change control, and risk ownership were clear. Workgroup members supported operational flexibility but wanted stronger assurance about how the methodology would be governed.

Question 7: Annual reporting

Responses were evenly split on whether annual reporting was sufficient, although all Workgroup members supported the reporting in principle. Workgroup members sought clarity on the report's frequency, content, recipients, confidentiality arrangements, and governance. Several supported including a high-level reporting requirement in Appendix K, with reports provided to Ofgem and the SQSS Panel for transparency, while leaving detailed requirements to the OCRA methodology. The Proposer preferred reporting arrangements to sit within OCRA governance, so no final agreement was reached.

Overall Discussions

The Workgroup members broadly supported the intent of GSR035 and the use of OCRA as a controlled, last-resort exception to existing SQSS security standards. However, Workgroup support remained conditional on further development of the OCRA methodology, governance arrangements, risk ownership, stakeholder protections, and regulatory oversight. The proposer clarified that GSR035 would establish the principle and minimum requirements, rather than the detailed methodology.

The Workgroup members emphasised the need to align GSR035 with OCRA, GC0191, possible consequential STC changes and wider System Access Reform. The proposer confirmed that all supporting material would be submitted to Ofgem together, comprising GSR035, the Grid Code modification relating to data, a possible STC modification, the completed OCRA methodology and recommendations on where OCRA governance should sit. Ofgem confirmed that it would review all the material but had not decided whether the OCRA methodology would form part of its decision-making considerations. Although delaying the Workgroup vote pending further

development of OCRA was discussed, no decision was reached. Instead, closer coordination and Workgroup member participation in developing the methodology was agreed.

The proposer confirmed that responsibility for leading the drafting and development of the OCRA methodology had not yet been decided. Ofgem requested that the proposed location of OCRA governance be included in the Code Administrator Consultation, however the Chair confirmed that there are standard questions which are asked as part of this consultation and no additional questions can be asked as part of the Code Administrator Consultation.

Reporting remained a key area of disagreement. Workgroup members supported transparent periodic reporting but differed on whether a minimum requirement should be included in Appendix K or addressed entirely through OCRA governance. Several Workgroup members supported reporting to Ofgem and the SQSS Panel, with the detailed content, frequency and confidentiality arrangements determined through OCRA. The proposer preferred the full reporting framework to sit within OCRA, and no final agreement was reached.

Workgroup members also sought clarification on whether previous advice attributed to the SQSS Panel represented a formal Panel decision or the individual views of Panel members and requested that the position be appropriately recorded. It was clarified that the request had not been submitted to the SQSS Panel formally but had been circulated to SQSS Panel Members.

Overall, the discussion confirmed broad support for GSR035 but identified the need for stronger governance, clearer regulatory status, improved stakeholder communication, and closer alignment with the OCRA methodology before the proposal could be progressed to finalisation.

Review of Terms of Reference

No Terms of Reference were discussed and would be scheduled on the next meeting agenda.

Timeline

The timeline would be discussed at the next meeting, following further discussions on the Workgroup Consultation responses.

A Workgroup member challenged the timing of the OCRA workshops. The proposer confirmed that invitations would be sent after the meeting.

Any other Business

No further items of any other business were raised at the Workgroup.

Next Steps

Progress the OCRA methodology alongside GSR035 and related code modifications, while maintaining coordination across the workstreams. Governance, regulatory approval, and reporting arrangements will be clarified, stakeholder communications improved, and the Workgroup report updated to reflect consultation feedback and outstanding issues. The timing of

the Workgroup vote and submission will be reviewed once the OCRA methodology is clearer, with February 2027 remaining an indicative alignment point.

Actions

For the full action log, click here.

Action Number	Workgroup Raised	Owner	Action	Due by	Status
36	WG10	LW	Correct the consultation response summary for Question 5 to show that all respondents agreed.	WG11	Open
37	WG10	DN/LW	Review stakeholder communications to ensure relevant stakeholders receive updates on OCRA workshops and related activities outside GSR035 meetings. Contact Workgroup members to confirm their consent to share email addresses for OCRA workshop invitations.	WG11	Open
38	WG10	DN/OCRA development group	Feed the consultation comments into OCRA development, including suggested reporting content, visibility to the SQSS Panel, governance, confidentiality, and redaction arrangements.	WG11	Open
39	WG10	LW	Speak to the SQSS Panel Chair and reconfirm the Panel members' earlier view on whether high-level requirements should sit in Appendix K, noting the Workgroup's preference for a reporting requirement.	WG11	Open
40	WG10	LW	Redraft the modification timeline and share it with the Workgroup for next WG. Prepare and submit a timeline extension request to the November SQSS Panel	WG11	Open

			because the Workgroup Report will not be ready for the November submission timetable.		
41	WG10	DN	Reconsider whether Appendix K should include a high-level reporting requirement, including reporting to the Authority and visibility to the SQSS Panel.	WG11	Open

Attendees

Name	Initial	Company	Role
Lurrentia Walker	LW	NESO, Code Administrator	Chair
Kayte Stanton-Hughes	KSH	NESO, Code Administrator	Technical Secretary
Dozie Nnabuife	DN	NESO	Proposer
Steve Baker	SB	NESO	NESO Representative
Andrew Allan	AA	RWE	Observer
Alan Creighton	AC	Northern Powergrid	Workgroup Member (Alternative)
Andy Lister	AL	Northern Powergrid	Workgroup Member
Amanda Rooney	AR	NESO	Observer
Andrew Urquhart	AU	SSE Generation	Workgroup Member
Andrew Henderson	AH	NESO	Observer
Bukky Daniel	BD	EDF Energy	Workgroup Member
Calum Watkins	CW	Ofgem	Authority Representative
Ethan Lau	EL	NESO	Observer
Fraser Scott	FS	SSEN Transmission	Workgroup Member (Alternative)
Mark Bowker	MB	National Grid	Workgroup Member
Maria Lopez	ML	NESO	Observer
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Muhammad Abrar	MA	NESO	Observer
Navdeep Singh	NS	National Grid	Observer
Steve Quinn	SQ	National Grid	Workgroup Member