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

Workgroup Meeting 11 , 03 November 2026

Online Meeting via Teams

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WELCOME



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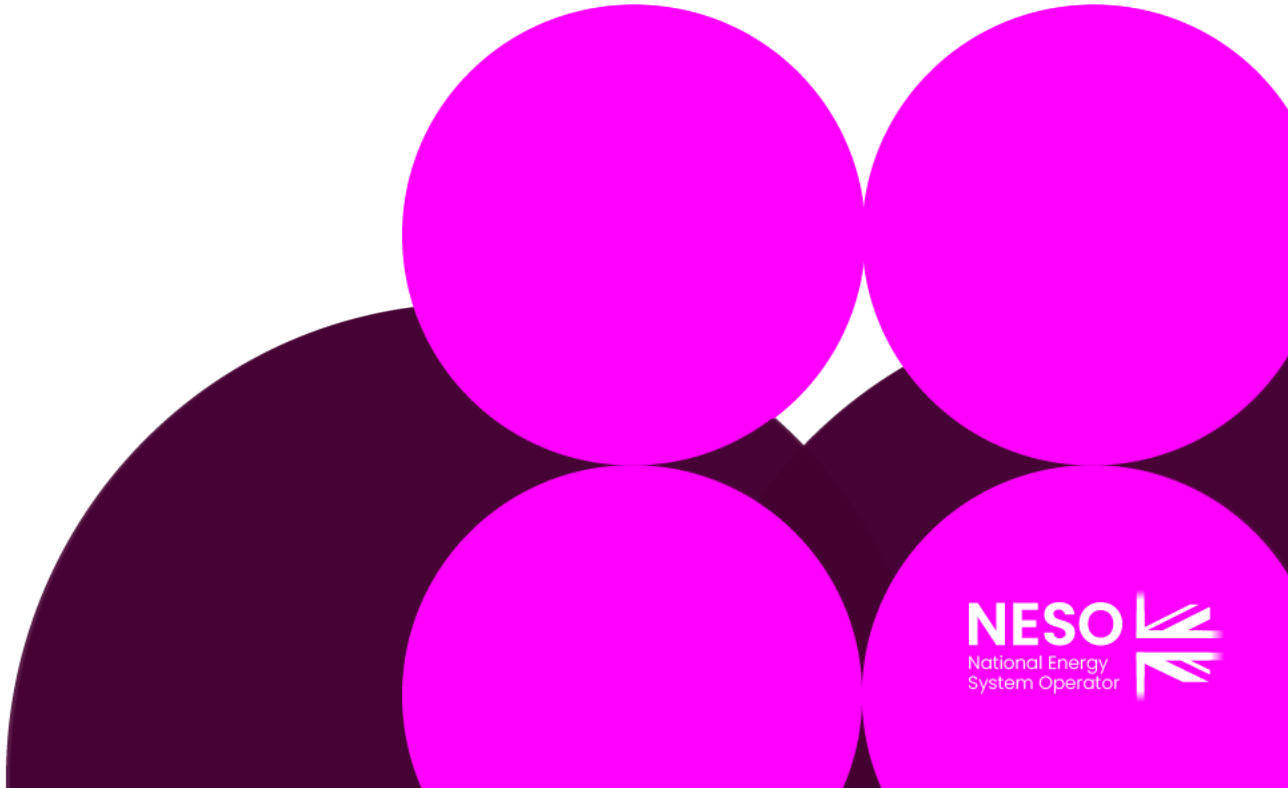
Agenda

Topics to be discussed	Lead
Objectives and Timeline • Walk-through of the timeline for the modification	Chair
Action Log	Chair
Review of GSR035 Workgroup Consultation Responses 8 & 9	All
Review Terms of Reference	All
Timeline	Chair
Any Other Business	Chair
Next Steps	Chair

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Action Log

Ren Walker – NESO Code Administrator



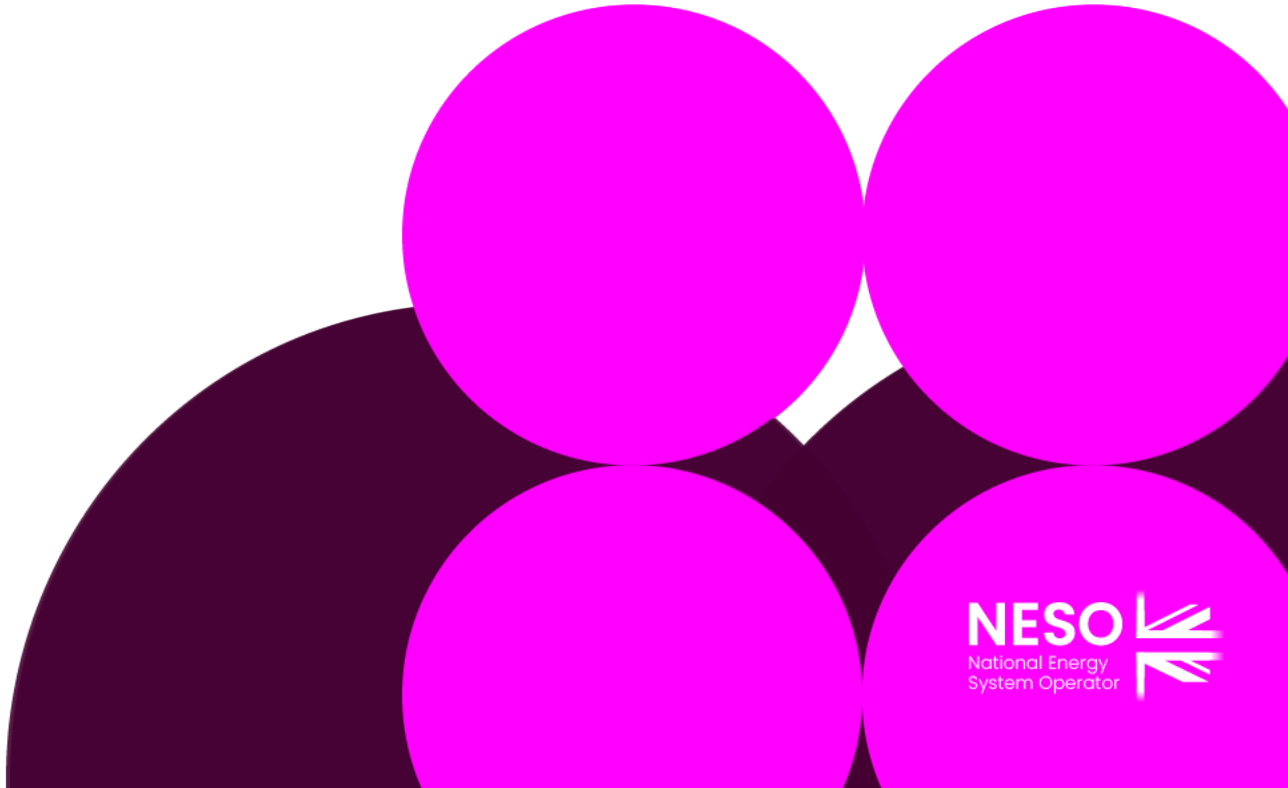
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Action Number	Owner	Action	Due by	Status
36	LW	Correct the consultation response summary for Question 5 to show that all respondents agreed.	WG11	Open
37	DN/LW	Review stakeholder communications to ensure relevant stakeholders receive updates on OCRA 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	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	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	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 because the Workgroup Report will not be ready for the November submission timetable.	WG11	Open
41	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

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Review Workgroup Consultation Responses

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Question 8: Do you agree that the description of the principles to be included as part of the risk assessment in Appendix K (Annex 04) are sufficient to reassure affected stakeholders?

- 4 of 6 respondents formally agreed that Appendix K's risk-assessment principles are sufficient; 2 disagreed.

Key themes:

- The principles require detailed implementation through the OCRA methodology.
- Assessments should cover all system, customer, financial and operational impacts.
- Affected stakeholders need engagement, objection and escalation rights.
- Clear governance, accountability, consent and regulatory oversight are essential.
- Compensation or cost recovery may be needed for adverse impacts.
- Appendix K is viewed as a workable foundation, but not complete reassurance by itself.

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Question 9: Are there any other matters relating to this proposal that you would like to raise? The Workgroup welcomes views on any aspect of the proposal, including topics not explicitly covered in this consultation?

- 4 of 6 respondents raised additional matters

Key themes:

- Complete and consult on the OCRA methodology promptly.
- Align the SQSS, Grid Code, STC and outage processes.
- Strengthen stakeholder rights, escalation and impact assessment.
- Clarify accountability and demonstrate delivered benefits.
- Define when exceptions apply, associated timescales and terminology.
- Monitor future regulatory and licence developments.

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Terms of Reference

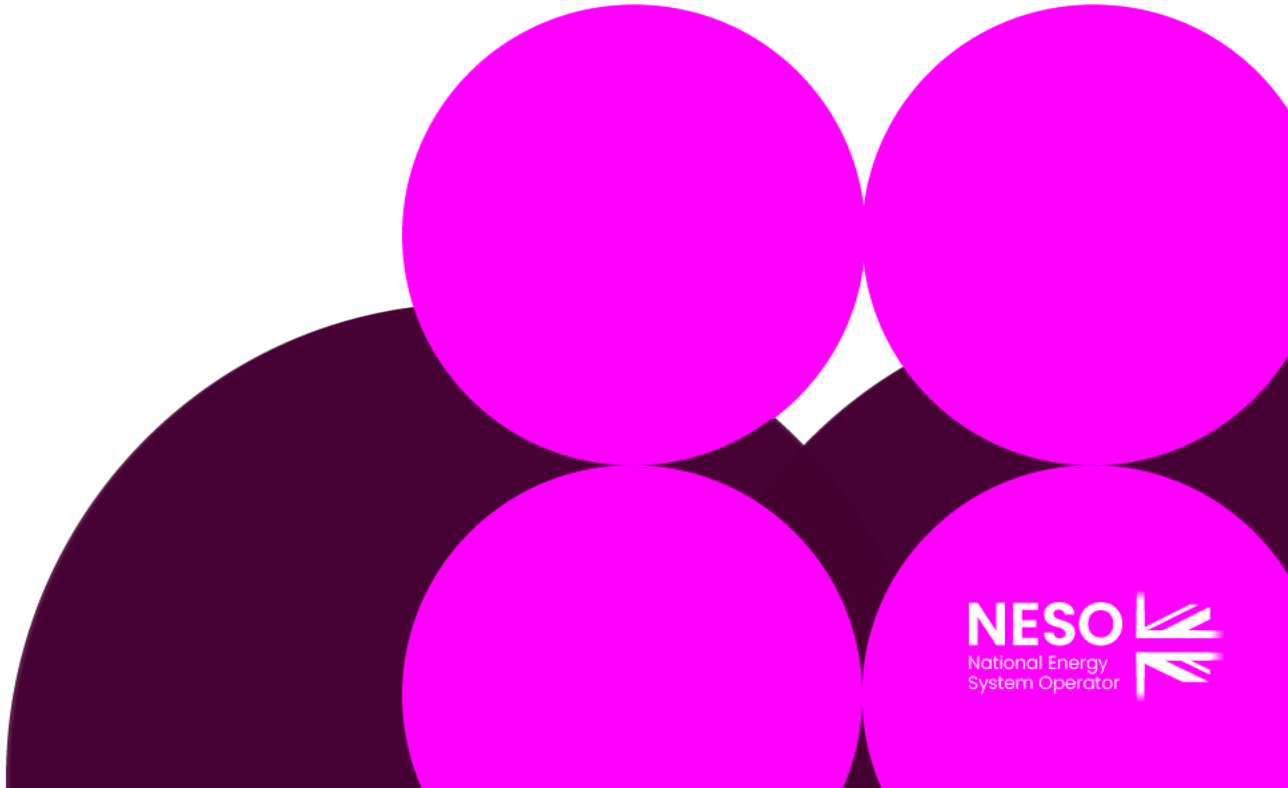
Workgroup Term of Reference
a) Consider the governance arrangements for the risk-based methodology as this need to be documented, open and transparent. The governance needs to be such that any affected stakeholder is able to influence the development and application of the methodology. The workgroup should explicitly consider whether the risk-based methodology should form part of the SQSS.
b) Clearly state the key assumptions and principles associated with the risk-based methodology.
c) Consider the rationale and benefits associated with the balance between short term increase in risk to stakeholders and the longer-term benefits associated with the connection of projects associated with the transition to a low carbon economy.
d) Consider whether a risk-based methodology should be associated with outages other than those to facilitate the implementation of the Clean Power 2030 Action Plan e.g. normal maintenance and asset replacement outages.
e) Consider whether the risk-based methodology should be applied across all four seasons or just during winter, as implied by the modification proposal.
f) Consider the most appropriate place for the methodology to be documented, so that it is open and transparent.
g) Consider the requirement for a Grid Code modification such that there is an obligation for all relevant parties to provide the required data to undertake the risk assessment, engage in the risk assessment process, share the results from application of the methodology and agree to its findings. Consideration should be given to the process where the impacted party does not agree with the outcome of the risk assessment. The party responsible for applying the methodology should also be codified.
h) Consider the number of occasions per annum when the new arrangements are expected to be applied and the relaxations implemented, to form a view of the potential benefits.
i) Consider whether the risk-based approach should be applied to high impact / low probability events only, or whether a risk-based approach could / should be applied to low impact / high probability events.
j) Quantify or provide examples of the change in risk to customer supplies arising from the implementation of a risk-based approach compared to a deterministic approach.
k) Consider the current risk assessment process applied in Scotland and whether it, in its current or modified form could be applied in England and Wales.

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Timeline

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GSR035 Proposed Timeline – 28 October 2026 (subject to approval by the SQSS Panel)

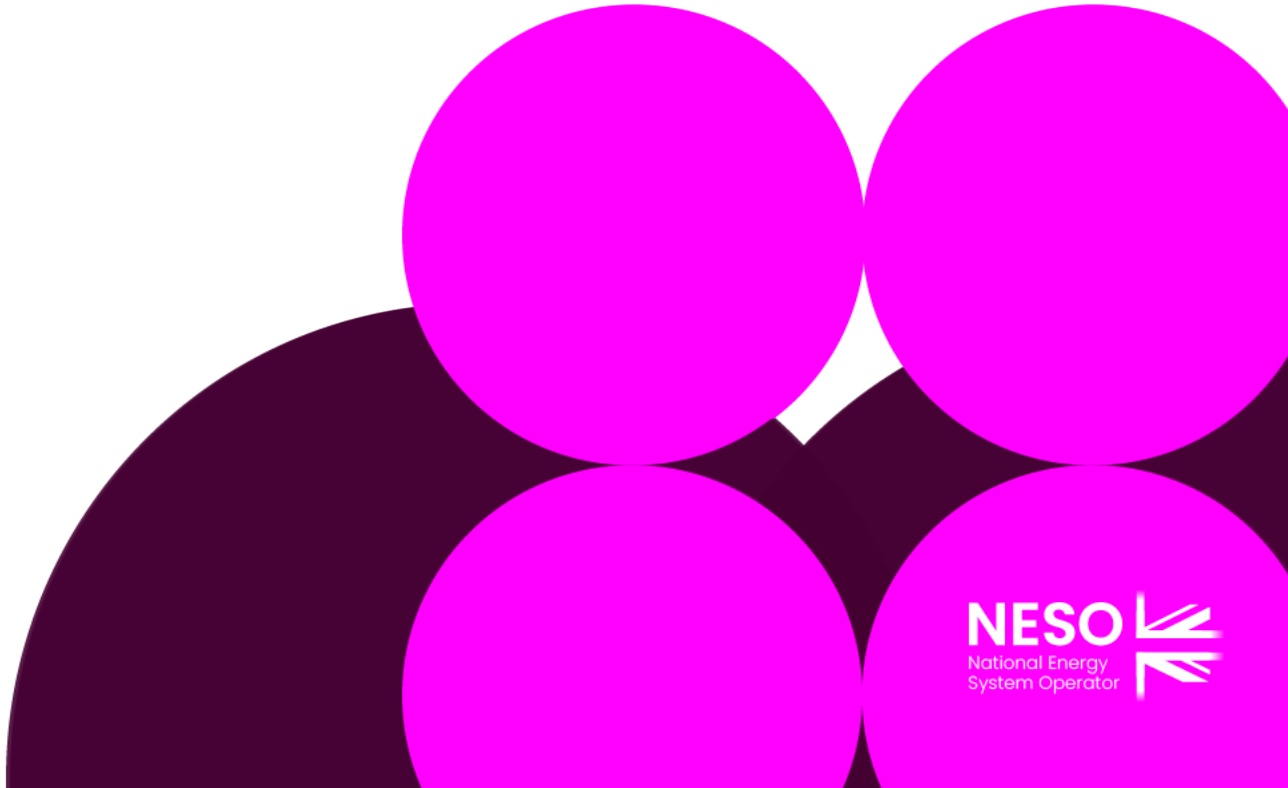
Milestone	Date	Milestone	Date
Modification presented to Panel	05 December 2025	Code Administrator Consultation (20 Business Days)	28 January – 25 February 2026
Workgroup Nominations (20 Business Days holiday period)	22 January 2026 – 12 February 2026	Draft Final Modification Report (DFMR) issued to Panel (10 Business Days)	March 2027
• Workgroup 8 – Review Appendix K • Workgroup 9 - approve Workgroup Consultation document	13 August TBC – w/c 31 August or 07 September	Panel undertake DFMR recommendation vote	March 2027
Workgroup Consultation (15 Business Days)	TBC (21 September – 12 October)	Final Modification Report issued to Panel to check votes recorded correctly	April 2027
Workgroup 10 – review consultation feedback and build Workgroup Report Workgroup 11 – Review consultation responses and ToR Workgroup 12 and 13? Workgroup Report and vote	20 October 03 November TBC TBC	Final Modification Report issued to Ofgem	April 2027
Workgroup report issued to Panel (10 Business Days)	13 January 2027	Ofgem decision	TBC
Panel sign off that Workgroup Report has met its Terms of Reference	27 January 2027	Implementation Date	10 Business Days after Authority decision

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Any Other Business

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Next Steps

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