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

Workgroup Meeting 10 , 21 October 2026

Online Meeting via Teams

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National Energy System Operator

WELCOME



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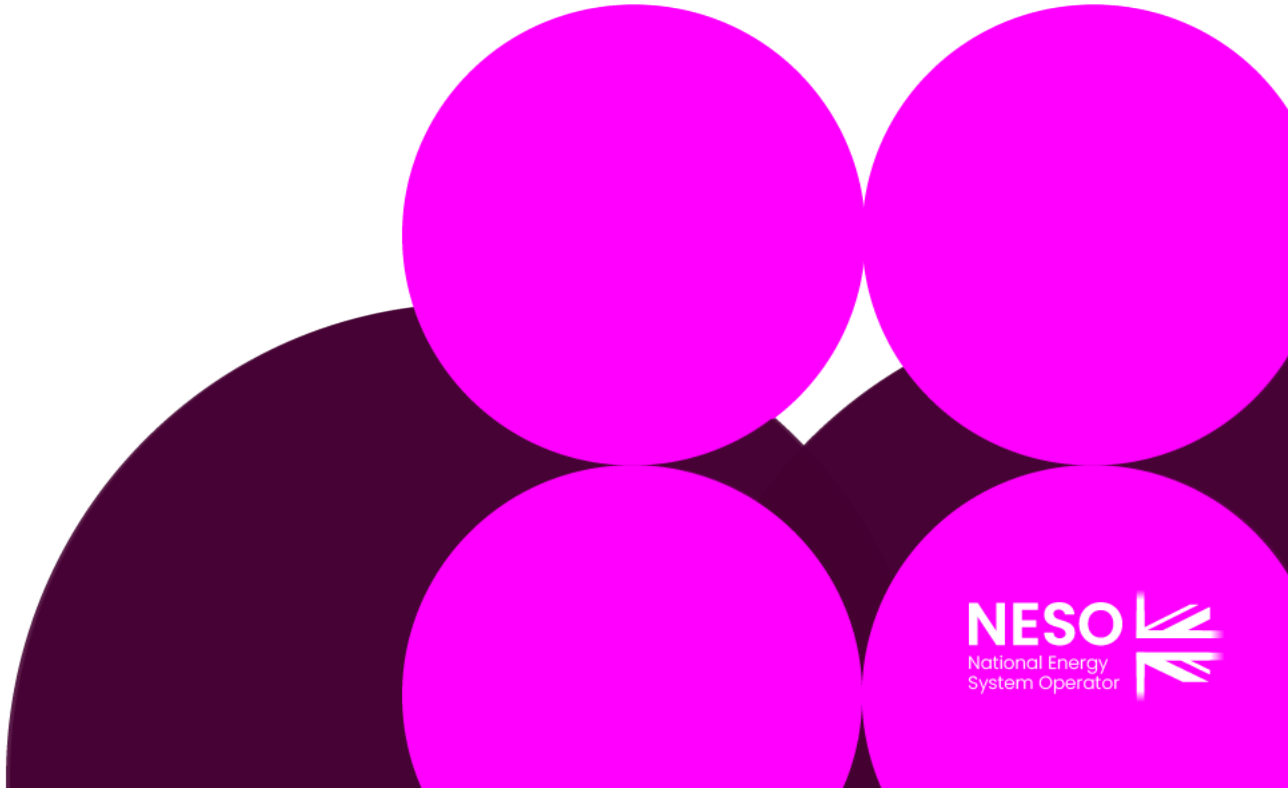
Agenda

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

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Review Workgroup Consultation Responses

Ren Walker – NESO Code Administrator



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Workgroup Consultation Responses Review

Q1 - Mark the Objectives which you believe the Original solution better facilitates: (6 Respondents in total)	None	a	b	c	d
Original		6	3	1	1

Question	Yes	No	No response
Q2 - Do you support the proposed implementation approach?	4	1	1
Q3 - Do you have any other comments?	6		
Q4 - Does the draft legal text satisfy the intent of the modification?	6		
Q5 - Do you agree that it is reasonable to retain the existing SQSS clauses 5.3 and 5.4 and supplement them with the proposed new clause 5.11.3?	6		
Q6 - Appendix K is written to contain high – level principles, while the detailed operational arrangements will be contained outside of the SQSS in the OCRA methodology. Do you think this is a good approach? Please explain your rationale. (Note that the OCRA methodology will go through a separate industry consultation process).	4	2	
Q7 -Do you think the proposed annual reporting schedule to the Authority is sufficient?	3	3	
Q8 -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	2	
Q9- 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	2	

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Question 1: Mark the Objectives which you believe the original solution better facilitates:

- Three respondents believe that GSR035 Original Proposal will better facilitate ACO (a)
- Two respondents believes that GSR035 Original Proposal will better facilitate ACO (a) and (b)
- One respondent believes that GSR035 Original Proposal will better facilitate ACO (a), (b), (c) and (d)

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Question 2: Do you support the proposed implementation approach?

- Four respondents support the proposed implementation approach
- One respondent does not support the proposed implementation approach yet
- One respondent abstained from responding

Areas of agreement

OCRA should be a controlled exception, not routine practice.

Existing SQSS security standards should remain the default.

Clear governance, accountability and transparent decision-making are essential.

The methodology must address stakeholder risks, consultation and escalation.

Areas of disagreement

Whether the approach is sufficiently developed to proceed now.

Whether the OCRA methodology and related code changes must be completed before implementation.

Whether a trial or pilot is required.

How detailed safeguards—risk caps, compensation and TO consent—must be before approval.

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Question 3: Do you have any other comments?

- All six respondents provided further comments

The main themes were:

- Clear governance, accountability and decision rights.
- Transparent assessment of system benefits and stakeholder impacts.
- OCRA should remain a controlled exception—not weaken SQSS standards.
- Alignment across the SQSS, Appendix K, Grid Code and OCRA methodology.
- Stakeholder safeguards, including consent, escalation and compensation.
- Coordinated regulatory approval and clearer legal drafting.

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Question 4: Does the draft legal text satisfy the intent of the modification?

- All six respondents agree that the draft legal text satisfies the intent of the modification.

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Question 5: Do you agree that it is reasonable to retain the existing SQSS clauses 5.3 and 5.4 and supplement them with the proposed new clause 5.11.3?

- All respondents agreed with retaining clauses 5.3 and 5.4 and adding clause 5.11.3.

Key themes:

- Preserve the existing SQSS security baseline.
- Allow only controlled, exceptional flexibility through OCRA.
- Require evidence that benefits outweigh risks.
- Ensure transparent governance and auditable decisions.
- Assess wider SQSS and frequency-response impacts.
- Protect affected stakeholders.

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Question 6: Appendix K is written to contain high – level principles, while the detailed operational arrangements will be contained outside of the SQSS in the OCRA methodology. Do you think this is a good approach? Please explain your rationale. (Note that the OCRA methodology will go through a separate industry consultation process).

- 4 of 6 respondents support placing high-level principles in Appendix K and detailed arrangements in a separate OCRA methodology.

Key themes:

- Appendix K must anchor enduring governance and safeguards.
- A separate methodology provides operational flexibility.
- Industry consultation and formal oversight are essential.
- Clear accountability, change control and risk ownership are required.
- Disagreement concerns the methodology's regulatory status and whether Appendix K is sufficiently robust—not operational flexibility itself.

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Question 7: Do you think the proposed annual reporting schedule to the Authority is sufficient?

- Respondents were evenly split: 3 Yes and 3 No on whether annual reporting to the Authority is sufficient.

However, all six support reporting in principle. Key themes were:

- Mandatory and transparent annual reporting.
- SQSS Panel and, potentially, Transmission Owner review.
- Case-level details covering decisions, objections and escalation.
- Measurement of risks, impacts, costs and delivered benefits.
- Reporting requirements embedded in Appendix K or the OCRA methodology.
- The disagreement concerns who reviews the report and how detailed it should be—not whether reporting is needed.

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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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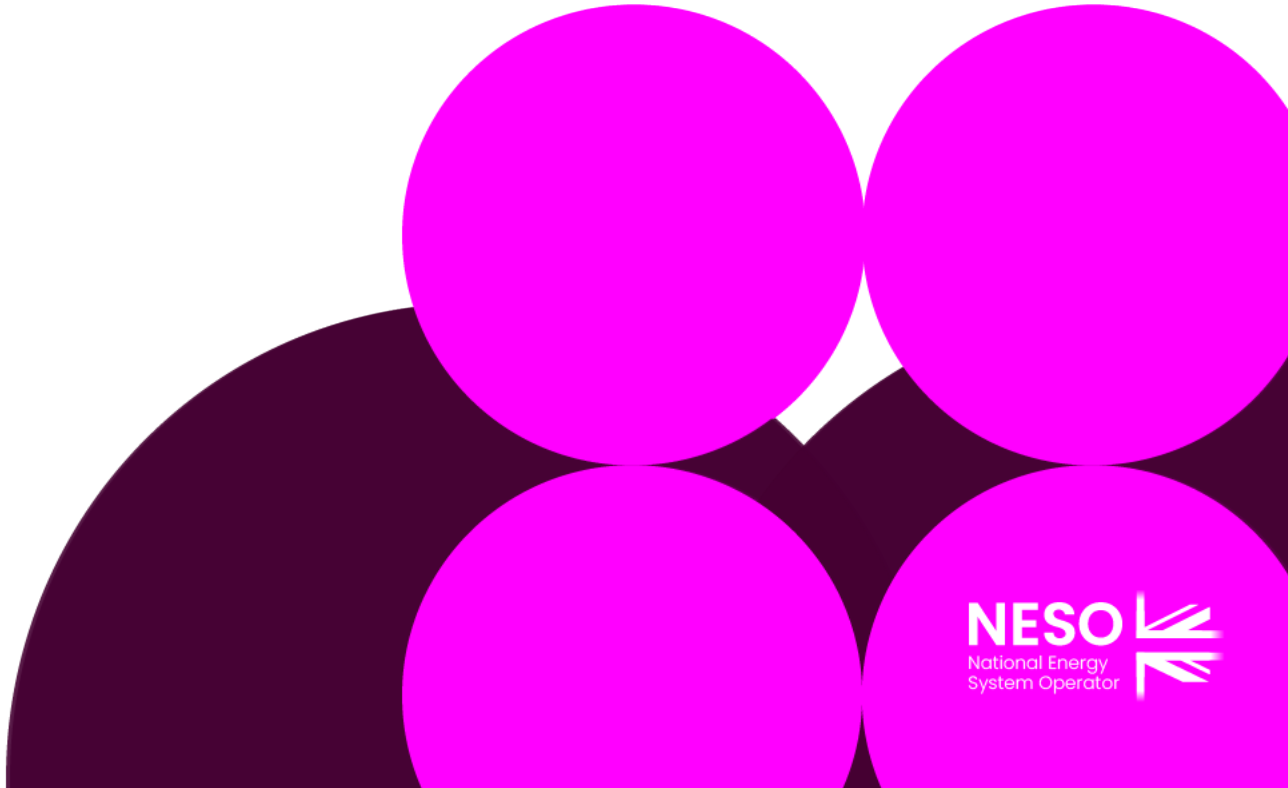
Terms of Reference

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

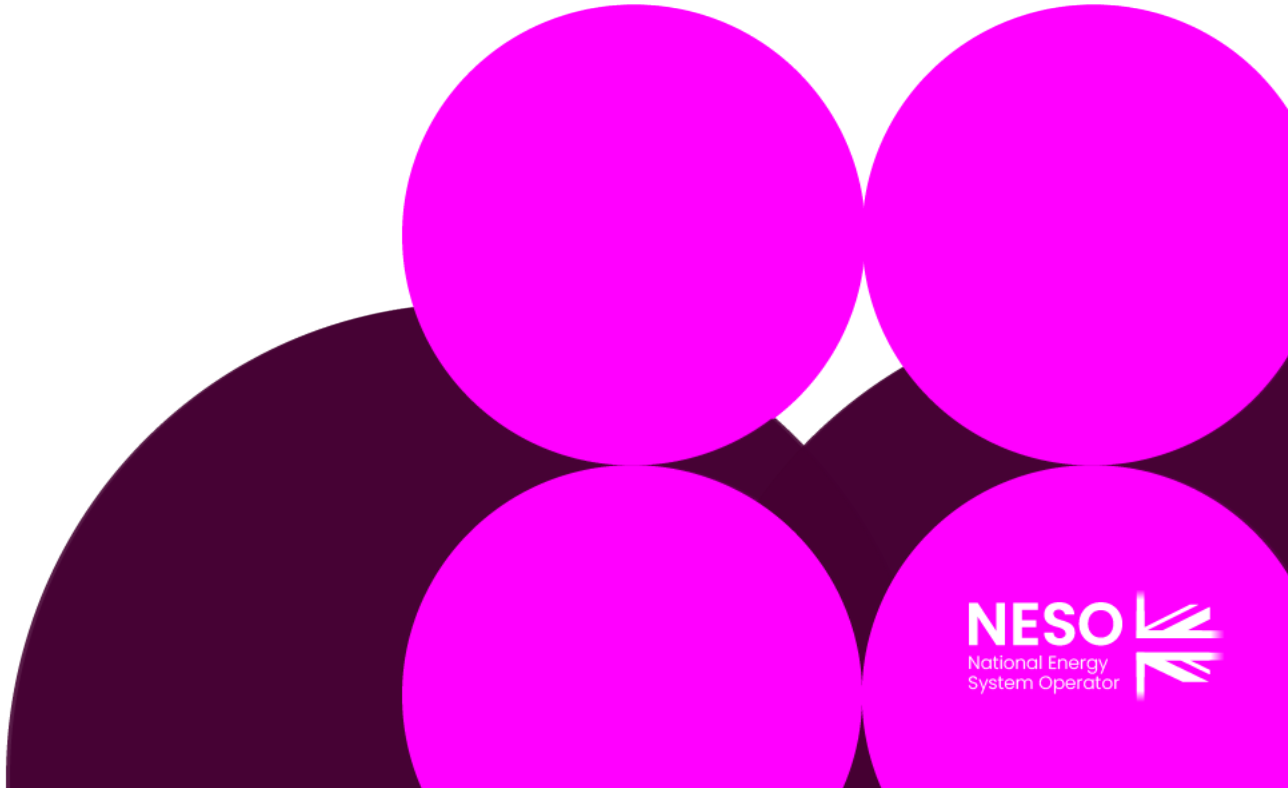
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Any Other Business

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Next Steps

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