Public

Code Administrator Meeting Summary

Workgroup Meeting 5: GC0186 Proposed Grid Code Changes - Post Electricity System Restoration Standard (ESRS)

Date: 23 October 2026

Contact Details

Chair: Claire Goult, Claire.Goult@neso.energy

Proposer: Antony Johnson, antony.johnson@neso.energy

Key areas of discussion

The Workgroup reviewed the consultation responses and the substantially revised draft legal text, with particular focus on Generator obligations, restoration timescales, offshore arrangements and the case for retaining regional differences. Workgroup members also considered the programme for completing the legal text and the remaining steps towards the Workgroup vote.

Timeline Updates

The Workgroup approved the cancellation of the next planned meeting in November to provide additional time to progress the revised legal text. It was proposed this meeting should be moved to early December. The meeting previously planned for early January was rescheduled to 12 January 2027 to improve member availability.

Workgroup Consultation Responses

Workgroup members broadly supported the intent of the modification but highlighted the need for the requirements to remain operationally achievable and proportionate. The principal concerns related to clarity of the implementation approach, the treatment of regional differences and whether the proposal could create unintended obligations or burdens for Generators and other affected parties.

Legal Text

The Proposer advised that the legal text had been substantially updated following the Workgroup Consultation. Comments received through the consultation and subsequent reviews had been

retained within the drafting for transparency, and responses or amendments had been made across each relevant section of the Grid Code.

The main amendments were intended to improve clarity and consistency. These included clearer wording on the restoration of site supplies and the time required for generating units to synchronise; alignment between the Planning Code and Data Registration Code; clarification of block load switching requirements; and greater consistency across the Connection Conditions, European Connection Conditions, Operating Code 5, Operating Code 9 and Balancing Code 2. The Proposer confirmed that references to cold start times and the relevant information in Data Registration Code Schedule 16 would be reviewed to ensure the drafting captured the intended restoration timescales.

In relation to PC.A.5.7, the Proposer explained that the original drafting mistakenly referred only to large and directly connected power stations. The intended scope under GC0156 was wider (Grid Code reference CC/ECC.3.1 (e) refers) and includes all Generators who own and/or operate all directly Connected Power Stations and Embedded Large, Embedded Medium and Embedded Small Power Stations which have a CUSC Contract. The correction was therefore intended to align the drafting with the existing GC0156 policy intent, rather than introduce a new obligation through GC0186.

The Workgroup discussed whether the revised text could create additional obligations or costs for Generators. A Workgroup member noted that previous restoration modifications had required significant supporting activity, including communications programmes, restoration studies, engineering assessments, testing, training, governance and compliance evidence. The Proposer stated that GC0186 was intended to clarify the existing GC0156 requirements rather than impose additional obligations or costs.

Further discussion focused on offshore arrangements and the requirements for critical tools and facilities. The Workgroup supported clarifying that the relevant provision should apply to both offshore Transmission Licensees and Generators progressing through the Generator Build arrangements through the Offshore Transmission System Development User Works (OTSDUW) arrangements. However, the wider drafting remained unresolved, particularly how to distinguish between facilities required at an onshore control point and those associated with Offshore Transmission assets, without creating unintended obligations or requiring derogations.

Harmonisation

The Workgroup considered in detail whether the legal text should retain regional differences or move towards a fully harmonised restoration framework. A Workgroup member argued that the current approach could increase complexity for parties operating in more than one region and appear to apply different standards to Transmission Owners compared with Generators, rather than different standards within either group.

It was also suggested that further evidence should be provided on the costs and benefits of harmonisation, rather than relying solely on qualitative assessments.

The Proposer explained that the proposed legal text retains regional differences because the Transmission arrangements in Scotland and England and Wales are historically, structurally and operationally different. In Scotland, Transmission includes the 132 kV network, Generators do not generally own their grid transformers, and Transmission Owners have historically held greater operational capability in relation to generation and restoration. In England and Wales, system operation and generation dispatch are undertaken by NESO, while Transmission Owners focus on network ownership, maintenance and switching.

The Proposer and one NGET Workgroup member expressed support for less harmonisation, explaining that full harmonisation could require Transmission Owners in England and Wales to develop generation-dispatch capability, additional communications links, specific operational systems, frequency-management tools, training and additional staffing. It was argued that these capabilities would largely duplicate functions already undertaken by NESO and would be required principally for infrequent restoration events. A further reason raised in support of less harmonisation was that the England and Wales network was considered to have a higher risk profile. Concerns were raised about data confidentiality, the allocation of legal responsibilities and the operational risk of relying on personnel who do not manage generation and frequency on a day-to-day basis. This operational risk argument was challenged during the discussion, with a question as to how it could be reconciled with the current arrangements in Scotland, where the Scottish TOs already undertake these activities. On this basis, some members considered that full harmonisation would likely increase costs, complexity and restoration risk without providing a proportionate consumer benefit.

A Workgroup member questioned whether Transmission Owners' existing systems and relationships could reduce the scale of additional investment required and whether locally managed restoration could reconnect customers more quickly. They requested a clearer assessment of the potential costs and operational benefits. It was also noted that the proposal may introduce a limited further difference between the Scottish Transmission Owners: one may

instruct generation during the Regional Restoration Plan phase, while the other does not intend to do so. The Workgroup agreed that this distinction, and the associated shift in responsibilities across all three Transmission Areas, must be clearly captured in the Workgroup Report.

The Proposer confirmed that the current legal text reflects the proposed regional approach and acknowledged that, if approved, the modification would result in less harmonisation than exists today. The discussion identified the historical and structural differences, potential benefits, costs, operational risks, capability requirements and effects on responsibilities that would need to be clearly presented in the Workgroup Report.

Next Steps

The revised legal text will be circulated with existing comments retained for transparency. Workgroup members will review the drafting and provide comments by 05 November 2026, identifying any remaining concerns, including provisions that may create additional obligations or costs. The Proposer will consider the feedback and address outstanding points with the ESRS team and other relevant parties ahead of further discussion on 03 December 2026.

The Workgroup Report will clearly present the case for and against harmonisation, including the limited difference between the Scottish Transmission Owners and the associated shift in responsibilities.

Actions

For the full action log, click here.

Action Number	Workgroup Raised	Owner	Action	Due by	Status
14	WG4	AJ	Review and respond to any comments in the legal text that had not been addressed and check unresolved legal text points with the ESRS team, including wording where confirmation was needed on ESRS-related assumptions.	28/08/2026	Closed
15	WG4	AJ	Re-baseline the legal text onto the latest Grid Code baseline before consultation.	28/08/2026	Closed

16	WG4	JH/MG	Recirculate updated Workgroup consultation document and draft legal text for review and comment. Schedule a short 'showstopper' meeting on ahead of consultation if any substantive issues are raised.	28/08/2026	Closed
17	WG5	All Workgroup members	Review the updated legal text. Workgroup members are requested to review updated legal text following WG consultation and provide comments by 05 November 2026.	05/11/2026	Open
18	WG5	All Workgroup members	Review Terms of Reference (ToR). Workgroup members are requested to review ToRs and provide a comment on how each ToR have been addressed or highlight if further action is required to complete.	05/11/2026	Open

Attendees

Name	Initial	Company	Role
Claire Goult	CG	NESO, Code Admin	Chair
Mollie Griffiths	MG	NESO, Code Admin	Technical Secretary
Anthony Johnson	AJ	NESO	Proposer
Anas Nassar	AN	National Grid Transmission	Workgroup member
Andrew Urquhart	AU	SSE Generation	Workgroup member (Alternate)

Ben Green	BG	Orsted	Workgroup member
Christopher Price	CP	NESO, Code Admin	Workgroup Observer
Tim Ellingham	TE	RWE	Workgroup member
Belinda Gonzalez Parrdo	BGP	Scottish Power Renewables	Workgroup member (Alternate)
David Sayer	DS	National Grid Distribution	Workgroup member
Issac Gutierrez	IG	Scottish Power Renewables	Workgroup member
Priyant Kumar	PK	NESO	Workgroup Observer
Susan Brush	SB	Ofgem	Authority Representative