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SQSS Modification Proposal Form

GSR039: Correction of Note References Following GSR036 Implementation

Overview: This modification corrects note references in SQSS Table 6.5 that were not updated following the addition of new notes to Table 6.4 through GSR036. The change is limited to correcting the affected references and does not alter the policy intent or substantive effect of GSR036.

Modification process & timetable

1. **Proposal Form**
   24 November 2026
2. **Code Administrator Consultation**
   01 December 2026 – 21 December 2026
3. **Draft Final Modification Report**
   27 January 2027
4. **Final Modification Report**
   09 February 2027
5. **Implementation**
   10 Business Days following authority decision

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: Low impact

Transmission Owners (TOs), Transmission System Operators (TSOs), National Energy System Operator (NESO), Distribution Network Operators (DNOs), Non-embedded Customers, Directly Connected Customers, Offshore Transmission Owners (OFTOs), Interconnectors and Generators.

Proposer's recommendation of governance route	Standard Governance modification to proceed to Code Administrator Consultation	
Who can I talk to about the change?	**Proposer:** David Allen david.allen@neso.energy	**Code Administrator Contact:** Teri Puddefoot Terri.puddefoot@neso.energy

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What is the issue?

GSR036 introduced new Notes 9 and 10 into SQSS Table 6.4. This changed the numbering of the subsequent notes beneath Table 6.5, but the corresponding note references within Table 6.5 were not updated. As a result, the references within the table do not point to the intended explanatory notes.

Why change?

The references should be corrected so that each provision in Table 6.5 points to its intended explanatory note. This will remove the drafting inconsistency and ensure that the implemented SQSS accurately reflects the approved intent of GSR036.

What is the Proposer's solution?

Amend the affected note references within SQSS Table 6.5 so that they correspond with the renumbered Notes 11 to 15 beneath the table. No changes are proposed to the wording of the notes, the voltage step-change limits, or the wider policy established by GSR036.

Draft legal text

- Following infrequent operational switching Notes 8, 9" becomes "Following infrequent operational switching Notes 11, 12"
- "In planning timescales, following a fault outage of a double circuit super grid overhead line Note 10" becomes "…Note 13"
- "Following any other secured event, Note 11…" becomes "…Note 14…"
- "Following a secured event involving loss of a double circuit transmission overhead line operating at 132 kV Note 12" becomes "…Note 15"

What is the impact of this change?

The modification has a low impact. It will provide clearer and internally consistent drafting for NESO, Transmission Owners, Distribution Network Operators and Non-Embedded Customers applying the voltage step-change requirements in Table 6.5. It does not change the applicable voltage limits, technical requirements, system operation or the substantive outcome of GSR036. No negative impacts have been identified.

Proposer's assessment against SQSS Objectives	
Relevant Objective	**Identified impact**
(a) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;	**Positive** The modification improves the clarity and consistency of the SQSS by ensuring that provisions in Table 6.5 refer to the correct explanatory notes. This supports efficient and coordinated application of the Standard without changing the underlying technical requirements.
(b) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;	**Neutral** The modification does not alter the level of security or quality of supply or the safe operation of the National Electricity Transmission System. It corrects references to the existing approved requirements.
(c) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and	**Neutral** The modification does not change market arrangements or the obligations placed on generators, suppliers or other market

	participants and therefore has no identified impact on competition.
(d) facilitate Licensees to comply with any relevant obligations under Assimilated law	**Neutral** The modification does not introduce or amend requirements relating to obligations under Assimilated Law. It is limited to correcting internal note references.

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	**Neutral** No substantive technical requirement is changed.
Lower bills than would otherwise be the case	**Neutral** No direct cost or consumer-bill impact has been identified.
Benefits for society as a whole	**Neutral** No direct societal impact has been identified.
Reduced environmental damage	**Neutral** No environmental impact has been identified.
Improved quality of service	**Positive** Correcting the references improves the clarity and usability of the SQSS for affected parties.

When will this change take place?

Implementation date

10 Business Days following Authority Decision.

Date decision required by

24 November 2026

Implementation approach

Following approval and completion of the applicable licence-change process, the NETS SQSS baseline will be updated by correcting the affected note references within Table 6.5. No systems, operational processes or industry implementation activities are expected to change.

Proposer's justification for governance route

The Proposer considers the straight to Code Administrator Consultation as the most appropriate routs as the modification is limited to correcting note references that were not consequentially renumbered following GSR036. The intended references can be identified from the approved and implemented drafting, the solution is fully developed, and no substantive change is proposed to the voltage limits, voltage step-change requirements or policy intent of GSR036. The process enables a streamlined, Code Administrator-led consultation in line with the Code Administrator Code of Practice, while maintaining procedural robustness.

Interactions

☐Grid Code	☐BSC	☐STC	☐CUSC
☐European Network Codes	☒Other modifications	☐Other	

This modification interacts directly with GSR036, "System Access Reform: Review of the voltage limits". It corrects note references in Table 6.5 following the renumbering of notes arising from implementation of GSR036. No interaction with the Grid Code, BSC, STC or CUSC has been identified.

Acronyms, key terms and reference material

Acronym / key term	Meaning
Authority	Gas and Electricity Markets Authority
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DNO	Distribution Network Operator
NESO	National Energy System Operator
SQSS	Security and Quality of Supply Standards
STC	System Operator Transmission Owner Code
TO	Transmission Owner

Annex	Content
Annex 1	GSR039 Draft Legal Text

Reference Material

- GSR036 Final Modification Report
- GSR036 Authority decision
- NETS SQSS Version 2.14
- GSR036 approved legal text