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Code Administrator Meeting

Summary

Workgroup Meeting 3: GC0186: Proposed Grid Code Changes – Post Electricity System Restoration Standard (ESRS)

Date: 6 August 2026

Contact Details

Chair: Sarah Williams, sarah.williams@neso.energy

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

Key areas of discussion

Key points included the proposed definitions of block loading and block load switching, removal of the proposed 10-minute block loading obligation, the need to balance regional flexibility with harmonisation, and the treatment of anchor and top-up restoration providers. Workgroup members also considered how affected parties, particularly Secondary Generators, would receive sufficient visibility of restoration arrangements while maintaining appropriate confidentiality and security controls. Further discussion focused on access to restoration plans and annexes, proposed OC9 drafting on the use of LJRP and DRZPs in exceptional circumstances, and whether all changes remained within the scope of GC0186. The Workgroup also reviewed the Draft Consultation document.

Next: The Workgroup agreed that Workgroup members should review the revised legal text and draft consultation document, using the current legal text as the baseline for comments. The Chair will update and circulate the consultation document alongside the latest legal text for Workgroup review.

Comments are due by **midday on 19 August 2026**, after which the volume and significance of feedback will inform whether any programme changes are needed.

Action Log Review

The Workgroup reviewed the open actions and confirmed the status of each item.

6- AJ. Closed. Update provided to Workgroup. GG added that Secondary Generators will not need to sign, and will not be parties to, the LJRP, DRZPs, or Regional Restoration Plans.

7- AJ. Closed. Update provided to the Workgroup.

8- AJ. Closed. Legal text has been updated by the Proposer with all comments addressed.

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9- SW. Closed. Action completed .

10- SW. Closed. Terms of Reference were updated and have been approved by Panel.

Legal Text Review

The Proposer summarised revisions made to the legal text since the previous meeting. The drafting had been updated to address Workgroup comments, clarify terminology and better reflect operational arrangements under the Electricity System Restoration Standard (ESRS). Key changes included new definitions for block loading and block load switching, amendments to anchor generation capability and Local Joint Restoration Plans (LJRPs), removal of obsolete transitional provisions, and consistency updates across relevant Grid Code sections.

Discussion focused on removal of the proposed 10-minute block loading obligation. The Proposer explained that a uniform requirement would be difficult to apply across all network areas due to differences in network topology and operational arrangements, so switching times would instead be set through relevant restoration plans. Workgroup members noted that Generators, particularly Secondary Generators who are not parties to those plans, would need sufficient visibility of relevant timings to support operational planning. The discussion distinguished between general publication of Regional Restoration Plan timings and the potential for confidential provision of relevant information to affected parties. One suggested approach was for NESO to provide relevant RRP block-loading timing information back to Generators who submit Week 24 data, rather than publishing the information more widely. The Proposer agreed to consider how visibility could be provided without creating wider security or confidentiality concerns.

Workgroup members also discussed how far regional differences should be reflected in the legal text. The Proposer explained that the drafting sought to preserve flexibility for differing transmission owner and restoration arrangements across Great Britain, while some Workgroup members questioned whether this aligned with broader harmonisation expectations. The differing views were noted, with the Proposer maintaining that some regional flexibility remained necessary.

The proposed definitions of block loading and block load switching were reviewed. Workgroup members considered whether the wording should define a specific quantity, such as a megawatt value, but others noted that restoration activities generally involve switching sections of the network rather than delivering a fixed volume of demand. The Proposer asked Workgroup members to review the revised drafting and provide further comments before additional changes were made.

The treatment of anchor and top-up restoration providers was also discussed. The Proposer explained that some transmission-level restoration arrangements may operate using only an anchor provider, while the legal text still retained flexibility for both anchor and top-up services where required. Workgroup members queried whether this was consistent with earlier restoration service arrangements and procurement documentation, particularly where top-up services may be needed to deliver the full restoration capability. The Proposer clarified that the policy intent

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had not changed and that the legal text continued to allow for anchor plus top-up arrangements where needed. The issue identified during the meeting was primarily the wording of the explanatory slide, which had unintentionally implied a more substantive change than intended. The Proposer agreed to amend the slide wording to avoid that implication.

The Workgroup then reviewed provisions relating to restoration control arrangements, information visibility, confidentiality and the practical application of restoration plans.

Workgroup members considered whether the drafting clearly explained access to restoration plans and annexes, including which parties would receive the full LJP and which would only receive specific annexes. The Proposer acknowledged that further work may be needed to define access rights and the level of visibility available to different restoration participants.

Overall, this phase of review focused on practical implementation rather than policy intent. Areas requiring clarification included operational authority during restoration, assets managed through common control points, access to restoration plans and annexes, and how restoration information should be shared with affected parties. The proposer agreed to consider the issues raised and invited further comments ahead of the next meeting.

The final part of the legal text discussion focused on proposed amendments to **Operating Code 9 (OC9)**, including when Local Joint Restoration Plans (LJRP) and Distribution Restoration Zone Plans (DRZPs) could be invoked by Scottish Transmission Owners.

A Workgroup member queried references to Scottish Transmission Owners invoking restoration plans in “exceptional circumstances”, including whether this extended beyond Partial Shutdown or Total Shutdown scenarios and whether market participants would have visibility if such arrangements were activated. Workgroup members were concerned that the wording could unintentionally broaden when restoration plans may be used or leave stakeholders unclear on the operational implications.

The Proposer explained that the drafting was intended to reflect existing procedures and differences between Scottish arrangements and those in England and Wales, rather than introduce new rights or obligations. Workgroup members asked for clearer drafting on when plans could be activated, who would be informed, and how participants not directly involved in restoration planning would know the arrangements were being used. Workgroup members also queried whether the reference to “exceptional circumstances” might relate to scenarios where there is a loss of communications with NESO and agreed that clarifying this point was key to understanding the intended scope and operational effect of OC9.4.6.

The scope of the modification was also discussed. One Workgroup member questioned whether extensive changes relating to LJRP and DRZPs fell within the approved terms of reference for GC0186, given that the modification's primary purpose was to introduce Regional Restoration Plans and associated clarifications. In response, another Workgroup member noted that the modification scope was not limited solely to Regional Restoration Plans and also included broader restoration-related clarifications arising from GC0156 and ensuring equitable treatment across network operators.

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The Proposer agreed to consider further clarification on when restoration plans could be invoked, how they interact with existing restoration procedures, and what visibility would be available to restoration participants and wider stakeholders.

Workgroup Consultation Review

The Chair introduced the Draft Workgroup Consultation document, noting that it had been populated with summaries of discussions to date. Workgroup members were invited to review the content to ensure it accurately reflected the issues considered and views expressed, including points raised on Secondary Generators and legal text clarifications.

Workgroup members were encouraged to provide comments, with a circulated copy to be issued for anyone unable to access the collaboration site. Wider Workgroup input was requested before the document is finalised.

Next Steps

The Workgroup agreed that the current legal text should be treated as the baseline for review, alongside the Draft Consultation document. Workgroup members should submit comments on both documents by **midday on 19 August 2026**, so feedback can be consolidated ahead of the next meeting.

The Proposer will consider the concerns raised on visibility of block-loading times, review the drafting of **OC9.4.6** in relation to “exceptional circumstances” and possible loss of communications with NESO, and amend the legal text review slides to clarify the treatment of anchor and top-up restoration providers.

The Workgroup also discussed whether the overall modification timeline should be extended to allow more time for review. While some Workgroup members noted the pressure created by the holiday period and the importance of ensuring the legal text is sufficiently mature before consultation, no decision was taken to amend the programme at this stage.

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Actions

For the full action log, click [here](#).

Action Number	Workgroup Raised	Owner	Action	Due by	Status
12	WG3	AJ	Amend the legal text review slides to correct the wording around transmission LJRP's, anchor providers and top-up providers, making clear that the legal text retains flexibility for anchor plus top-up arrangements where required	WG4	Closed
13	WG3	All	Review the legal text and draft consultation document and provide comments.	19 August 2026	Open

Attendees

Name	Initial	Company	Role
Sarah Williams	SW	NESO	Chair
Mollie Griffiths	MG	NESO	Tech Secretary
Alan Creighton	AC	Northern Powergrid	Workgroup member alternate
Antony Johnson	AJ	NESO	Proposer
Andrew Mcleod	AM	Northern Powergrid	Workgroup member
Andrew Urquhart	AU	SSE	Workgroup member alternate
Belinda Gonzales	BG	Scottish Power Renewables	Workgroup member alternate
Ben Green	BG	Orsted	Workgroup member
Susan Brush	SB	Ofgem	Authority Representative

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Garth Graham	GG	SSE Generation	Workgroup Member
Graeme Vincent	GV	SP Energy Networks	Workgroup member
Jonathan Lakey	JL	SP Energy Networks	Workgroup member
Kwaku Nti	KN	Perigus Energy	Workgroup observer
Leon Burdekin -Roberts	LBR	EDF Power Solutions	Workgroup member
David Sayer	DS	National Grid Distribution	Workgroup member
Tina Dawn Marshall	TDM	Tina Marshall Consultancy	Workgroup observer
Shameel Mohammed	SM	NESO	Workgroup observer
Paul Swan	PS	SSEN Transmission	Workgroup member
Anas Nassar	AN	National Grid	Workgroup member
Tim Ellingham	TE	RWE	Workgroup member
Victor Ugbome	VU	NESO	Workgroup observer