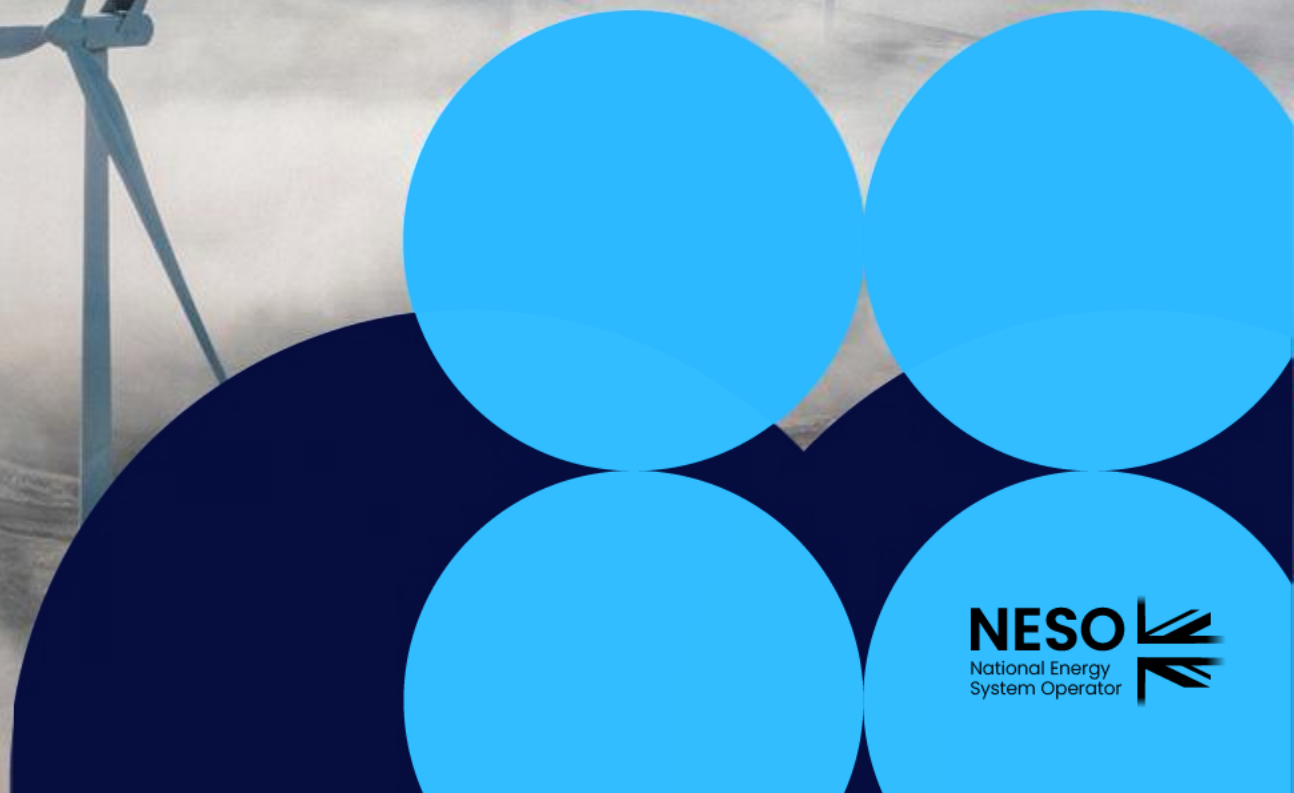


Grid Code Development Forum

08 July 2026



Agenda

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- 1 Introduction, meeting objectives and review of previous actions – **Claire Newton, NESO**

 - 2 Code Administrator Update – **NESO (Code Administrator)**

 - 3 Problem Statement 1 for GC OC2 review SAR OP4 workstream – **Andrew Henderson, NESO**

 - 4 System Access Reform Grid Code Modification (GC0XXX – OC2) GCDF Engagement pre-raising modification– **Dozie Nnabuife, NESO**

 - 5 AOB and Meeting Close – **Claire Newton, NESO**

GCDF – Objectives and Expectations

Objective

Develop ideas, understand impacts to industry and modification content discussion, in relation to Grid Code related issues.

Anyone can bring an agenda item (not just NESO!)

Expectations

Explain acronyms and context of the update or change

Be respectful of each other's opinions and polite when providing feedback and asking questions

Contribute to the discussion

Language and Conduct to be consistent with the values of equality and diversity

Keep to agreed scope

The Forum will be recorded and made available on the GCDF webpage along with summary notes.

Code Administrator Update

NESO (Code Administrator)

Problem Statement 1 for GC OC2 review

SAR OP4 workstream

Andrew Henderson, NESO

Context



What is system access?

System access is the process to safely plan and deliver outages on assets on the network.

It is a complex process that takes place largely between NESO and TO but requires input from all energy system stakeholders.

Outages may be required for a number of reasons, some of these are:

- Network upgrades
- Network maintenance
- Returning faulted assets
- Connecting new assets/ users
- Proximity to other works

Some of the complexities are:

- Constraint costs. Outages on the network can cause bottlenecks. To manage these, generation sometimes needs to be re-dispatched causing constraint costs.
- Security. Operation of the network must at all times be compliant to the NETS SQSS. Securing for the worst fault can cause certain combinations to be impossible in combination. This is referred to as outage clashes.
- There are a large volume of outages every year ~7500 and around double this again of change requests and other outage processing.

Why are outage delays a problem?

CP30 is driving a large amount of electricity network reinforcements and connections which is putting additional pressures on system access.

These additional pressures are resulting in a more congested outage plan.

Additionally, in the shift towards more renewables and new grid technologies on the network the number of network Users has drastically increased.

These factors mean:

- Outage delays can often cause knock-on impacts due to plan congestion.
- Outage delays can impact multiple users. Delaying due to no response from one user can have financial impacts to multiple other users.
- If TOs are uncertain of a user agreeing to an outage they have less confidence when contracting third parties for works.
- Certain outage combinations require specific system conditions to be able to progress. It can be very difficult to find new locations in the plan for these outages if they are required to move.
- Short notice change drains resource for all parties.

Aims and overview

Alignment to TAP actions

This work aims to address actions from the [NESO response to the Electricity Networks Commissioner's Report on accelerating electricity transmission network build](#).

Specifically, the information in this presentation considers actions OP4_4, OP4_7b, and OP4_20b.

OP4_4: Commence a programme of engagement with generation owners with a view to eventually proposing code modifications and/or alternative working arrangements regarding generator outages.

OP4_7b: Review existing codes to ensure that there is a fair mechanism for NESO to complete its Outage Planning processes in the absence of timely response from affected Users.

OP4_20b: Consider modifying the Codes to allow NESO to "Tell" rather than "Request" an outage after consultation period has lapsed.

Aims

It is important to remember throughout that we are trying to improve this process for all parties.

The stakeholders include:

- NAP (NESO)
- ENCC (NESO)
- Generators
- Directly Connected customers
- DNOs
- TOs

The aim is to:

- Ensure system and asset security
- Improve the process of assessing outages
- Reduce admin requirements for all parties
- Be consistent in the application of the process
- Improve clarity and confidence in the outage plan
- Be more proactive with communication of the plan between parties, especially around change

Problem Statement 1

User late response can postpone outages



Problem Statement 1

User late response can postpone outages. Particularly if, there are significant challenges for Network Access Planning (NAP) chasing Users for agreement/confirmation that delay finalising the outage plan.

This can cause the following issues:

- User rejection of outages due to outage duration or impacts can delay essential works
- Time for NAP engineers to optimise the outage plan is limited due to significant time spent chasing Users for outage agreement
- Large numbers of outages can remain 'With SO' during the delivery phase (DA-3WA) waiting for User agreement. This can cause uncertainty for the TO.
- Users may be required to provide isolation for transmission outages to proceed, agreement is necessary in this case.
- ENCC resource can be drained to resolve issues that could have been solved earlier in the process

Case studies

Some case studies are anonymised and summarised here:

E&W issues:

- Solar user rejected a summer outage on grounds of reduced revenue. NESO and TO could not facilitate this change. Outage was required to repair a fault with high priority. User lacked understanding of the obligations under codes and BCA
- User not aware of outage when contacted by ENCC in control timescales. User had been contacted at YA and MT. This outage required user side switching resource which was not ready. Therefore, the outage was delayed. This was a fail to fly
- User claimed they had no information of outages ahead of operational timescales. ENCC required to process these requests despite user being notified via OC2 reports

Scotland issues:

- User rejecting all outage requests on grounds of impacting revenue despite having a BELLA contract. Outage co-ordination is very time consuming and results in NESO imposing the outages
- User claiming wind turbines are at risk of damage during shutdowns in the winter period resulting in rejecting all winter outage requests despite having a BELLA contract
- User ignoring email notification and comms in planning timescale resulting in ENCC having to deal directly with the user in operational timescales

Existing OC2

(b) By 1000 hours each Friday.

Generators, Interconnector Owners, Restoration Contractors (as provided for in OC2.3.1(f)) and **Network Operators** will discuss with **The Company** and confirm in writing to **The Company**, acceptance or otherwise of the requirements detailed under OC2.4.1.3.5.

OC2.4.1.3.5 is the Grid Code reference to the programming phase of outage planning.

Due to OC2.4.1.3.5-a) for the greater than 7 week ahead period Users should respond to all notifications by 10am every Friday.

And due to parts c, this would also include the preliminary outage plan up to 7 weeks ahead

Part c(v) has an additional clause for nuclear large power stations

Existing gaps in OC2

Within week requests:

In the existing code, there is no clear process for dealing with outage requests submitted after 10am on a Friday and due before 10am the next Friday

No response:

There is no clear process in the case that a User does not respond by the deadline:

- Should approval be assumed?
- Does this mean the works must be replanned?
- Should a curtesy call be made to the User to establish contact
- Should the User be considered in breach of Grid Code and be disconnected until comms can be re-established

Option Criteria

User late response can postpone outages



Option Criteria

Option	Within week requests	Clear action in the case of no response	Grid code change required	Ensure system and asset security	Reduce admin requirements	Improve clarity and plan confidence
Example 1	No	Yes	No	No	N/A	No
Example 2	Yes	Yes	Yes	Yes	Yes	Yes

Appendix 1: OC2.4.1.3.5 Clauses

OC2.4.1.3.5

Programming Phase

(a) By 1600 hours each Thursday

(i) **The Company** shall continue to update a preliminary **National Electricity Transmission System** outage programme for the eighth week ahead, a provisional **National Electricity Transmission System** outage programme for the next week ahead and a final day ahead **National Electricity Transmission System** outage programme for the following day.

(ii) **The Company** will notify each **Generator**, **Interconnector Owner**, **Restoration Contractor** (as provided for in OC2.3.1(f)) and **Network Operator** and each **Non-Embedded Customer**, in writing of those aspects of the preliminary **National Electricity Transmission System** outage programme which may operationally affect each **Generator** (other than those aspects which may operationally affect **Embedded Small Power Stations** or **Embedded Medium Power Stations** unless they are owned and/or operated by a **Restoration Contractor** (as provided for in OC2.3.1(f)) or **Interconnector Owner** or **Network Operator** and each **Non-Embedded Customer** including in particular proposed start dates and end dates of relevant **National Electricity Transmission System** outages.

(c) By 1600 hours each Friday

(i) **The Company** shall finalise the preliminary **National Electricity Transmission System** outage programme up to the seventh week ahead. **The Company** will endeavour to give as much notice as possible to a **Generator** with nuclear **Large Power Stations** which may be operationally affected by an outage which is to be included in such programme.

(v) Where a **Generator** with nuclear **Large Power Stations** which may be operationally affected by the preliminary **National Electricity Transmission System** outage programme referred to in (i) above (acting as a reasonable operator) is concerned on grounds relating to safety about the effect which an outage within such outage programme might have on one or more of its nuclear **Large Power Stations**, it may contact **The Company** to explain its concerns and discuss whether there is an alternative way of taking that outage (having regard to technical feasibility). If there is such an alternative way, but **The Company** refuses to adopt that alternative way in taking that outage, that **Generator** may involve the **Disputes Resolution Procedure** to decide on the way the outage should be taken. If there is no such alternative way, then **The Company** may take the outage despite that **Generator's** concerns.

System Access Reform Grid Code Modification (GC0XXX – OC2)

GCDF Engagement pre-raising modification

SAR Modifications Interactions overview

Mod	Defect	Current status
GSR035	SQSS does not have flexibility to allow a structured route to permit beneficial outages where strict compliance is inefficient	Workgroup stage progressing; recent WG held and moving toward report/consultation stages
GSR036	Voltage limits in SQSS are overly restrictive and not aligned with asset capability or efficient operation	CAC progressing with ongoing engagement and refinement of position
PM0153	Formalise the criteria for recalling of circuits with longer Emergency Return to Service (ERTS) to help secure the transmission system during the winter periods.	Implemented in STCP 11-1 (deemed material and approval by Authority)
PM0154	Lack of integration of planning / constraint data into long-term decision-making processes	Implemented in STCP 16-1 following Panel decision (deemed not material)
GC0XXX OC2	Grid Code outage planning arrangements not aligned with SAR / SQSS reforms, creating cross-code misalignment	Raise proposal summer 2026; drafting and early engagement underway ahead of formal submission

SAR: Consequential changes to outage planning and coordination (OC2)

Purpose

- Provide an update on the proposed Grid Code modification
- Support implementation of System Access Reform
- Seek early stakeholder views ahead of formal submission to Grid Code Review Panel

Defect

- The GC (OC2) reflects legacy outage planning arrangements
- System Access Reform through GSR035 and GSR036 introduces a more co-ordinated and flexible approach to system access. These changes are not currently reflected within OC2, risking potential misalignment between SQSS policy and Grid Code processes.
- This is intended to be a consequential alignment modification, not a policy setting one. Policy sits with GSR035 and GSR036

Indicative scope of OC2 changes

In scope

- Outage planning and coordination provisions
- OC2.4.1 coordination responsibilities
- Roles and responsibilities of NESO, TOs, and Users
- OC2.4.2 data and information requirements
- Alignment of terminology with SAR concepts

Out of scope

- System Access reform policy decisions
- Detailed operational procedures (e.g. STCP development)
- Wider GC rationalisation activity
- Changes unrelated to SAR alignment

Proposed approach

- Develop consequential GC drafting aligned to the final outcomes of GSR035 and GSR036

Interactions and dependencies

Policy layer

- GSR035- Flexibility in allowing beneficial outages subject to risk assessment
- GSR036- Review of Voltage Limits

Implementation layer

- Associated STC/STCP developments

GC Layer

- New GC0XXX modification aligns OC2 outage planning requirements with the agreed SAR framework established through GSR035 and GSR036
- Interaction with ongoing OC2 work, **using GC0164 changes to OC2 as a baseline**

Next steps

- Refine proposal including any GCDF feedback
- Submit modification proposal to GC Review Panel in July
- Progress through standard governance with Workgroup assessment
- Target aligned implementation with the wider System Access Reform package

Thank You

AOB

1. Update on timeline and impacts of alignment with the EU
2. Update on Energy Code Reform
3. Aurora raised compliance challenges with low system strength networks
4. Changes to GCDF Summary
5. Amanda Rooney: Guidance Document consultation period