

Public

# Code Administrator Meeting Summary

## Workgroup Meeting 6: GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems

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**Date: 03 June 2026**

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### Contact Details

Chair: Lurrentia Walker, [Lurrentia.walker@neso.energy](mailto:Lurrentia.walker@neso.energy)

Proposer: Dozie Nnabuiife, [Dozie.Nnabuiife@neso.energy](mailto:Dozie.Nnabuiife@neso.energy)

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### Key areas of discussion

The Chair welcomed the Workgroup members and observers to Workgroup 6 and gave a brief outline of the agenda.

### Objectives and Timeline

The Chair discussed the timeline for GSR035 modification, highlighting that the timeline will need to be amended to allow time for an additional Workgroup meeting ahead of the Workgroup Consultation being published.

### Action Log Review

**Action 22: (Open)** The action remains open, the Workgroup to review and finalised the approach to consequential modifications, including whether they should be raised and submitted as a package, the timing of the Grid Code modification, and how this aligns with the overall delivery timeline.

**Action 25: (Closed)** The Workgroup agreed to close this action.

**Action 26: (Closed)** The Workgroup agreed to close this action.

### Review Appendix K

The Workgroup reviewed a revised draft of Appendix K and the associated legal text, with several updates made in response to earlier feedback. These included clarifying that paragraph 5.3.4 would not fall within the Appendix K route because unacceptable frequency conditions are already dealt with under the existing Appendix H / paragraph 5.11.2 methodology, adding the title “operational security relaxation framework”, and improving drafting clarity around where temporary disapplication’s of SQSS requirements could apply. The presenters also said they had reduced repetition, improved consistency, expanded role descriptions (including interconnectors), added wording on confidentiality in K15, and refined the decision-recording template.

## Public

The main discussion focussed on governance, agreement and veto rights. Several Workgroup members highlighted that the draft did not clearly explain what happens if a TO, DNO or other affected stakeholder does not agree with an ISOP recommendation. The Workgroup members debated that this is a fundamental issue that should be explicit in Appendix K, with suggestions that the text should be clear that if relevant parties do not agree, the default SQSS requirements continue to apply. Workgroup members also raised concerned that affected parties, especially DNOs and connected customers bearing operational or safety consequences, must have a meaningful ability to block or reject a proposal.

The Proposer advised that Appendix K should set out the “what”, while the detailed “how”—including how disagreements are handled, should be developed later through a separate process under NESO’s planning arrangements, with stakeholder input and approval by the Authority. The Proposer disagreed to putting an explicit veto mechanism into the SQSS itself, adding that, the detailed process should instead be agreed by planners and technical experts and then approved by the Authority. The Proposer also explained that the practical operation of outages already relies on affected network owners and stakeholders being engaged through existing planning processes.

The Workgroup discussed the purpose of the proposal. The Proposer advised that the intent is primarily to allow TOs to request reassessment of outages that NESO would normally reject under deterministic SQSS rules, where broader benefits (such as development or wider network impacts) justify a more flexible assessment. This prompted questions from Workgroup members about whether the proposal is TO-initiated only, whether it also benefits NESO, and how this aligns with earlier workgroup understanding.

The Workgroup did not resolve the core issues, there was some acceptance that the draft may need to be restructured or clarified, particularly around:

- the interaction between K15.4, K15.5 and K15.7,
- what “agreement” means in practice,
- and whether the document should say more explicitly what happens when agreement is not reached.

## Review and update Workgroup Consultation

The Workgroup discussed the upcoming Workgroup Consultation and agreed that an additional meeting would be needed ahead of the Workgroup Consultation being published. Workgroup members generally supported this approach. The Workgroup discussed whether everything should go to Ofgem as a package, the overall direction was to continue progressing the main modification while consequential changes developed alongside it.

## Public

The Proposer outlined several updates to the draft in response to feedback from the previous meeting and internal review.

These included:

- clarifying in paragraph 5.11.3 that paragraph 5.3.4 (unacceptable frequency conditions) is not part of the Appendix K route because it is already addressed separately through the existing Appendix H / paragraph 5.11.2 methodology;
- adding the title “operational security relaxation framework”;
- refining wording to make clearer where temporary disapplication of paragraphs 5.3 and 5.4 may apply;
- introducing drafting changes in 5.11.2 for alignment and clarity;
- improving the description of roles and interactions, including the role of interconnectors and different routes where a TO or other stakeholder initiates a relaxation request;
- adding wording in K15 on confidentiality and treatment of commercially sensitive information;
- revising the decision–recording template and related forms;
- reducing repetition, improving consistency, and shortening parts of the methodology;
- adding text to better explain the NESO network access planning process and to avoid creating unintended new obligations in Appendix K itself.

### Main consultation issue raised

The major unresolved issue for the Workgroup consultation was how disagreement should be handled. Workgroup members debated that the draft still did not clearly explain what happens if a TO, DNO or other affected stakeholder does not agree with an ISOP/NESO recommendation. The Workgroup agreed that this was fundamental and should be clearer before consultation, with suggestions the text should be made more explicit that if agreement is not reached, the normal SQSS requirements should continue to apply.

The Proposer advised that Appendix K should define the principle and that the detailed governance of disagreement, approval, escalation and any veto rights should be developed later through the process document, to be agreed by relevant parties and approved by the Authority. The Workgroup did not resolve this disagreement, but there was some acceptance that the draft may need further changes for clarity before consultation proceeds.

### Next Steps

A further Workgroup meeting to be arranged ahead of the Workgroup Consultation being published.

## Public

NESO will continue developing the consequential modifications, particularly the Grid Code modification, which was said to already be in draft and is currently expected to be raised in June or July, subject to how quickly the Appendix K position is settled.

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## Actions

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

Action Number Raised	Workgroup	Owner	Action	Due by	Status
27	WG6	DN/SB	Consider whether the Grid Code modifications should be raised in June/July to support the aim of getting the consequential modification to Ofgem in time for consideration alongside the main modification.	WG7	Open
28	WG6	DN/ML	To review and provide a clearer drafting of Appendix K to improve clarity for escalation route provisions, where agreement is not reached.	WG7	Open
29	WG6	DN	To consider whether the Workgroup Consultation should explicitly ask for views on the agreement/veto/disagreement point.	WG7	Open

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## Attendees

Name	Initial	Company	Role
Lurrentia Walker	LW	NESO, Code Administrator	Chair

## Public

Kayte Stanton-Hughes	KSH	NESO, Code Administrator	Technical Secretary
Dozie Nnabuife	DN	NESO	Proposer
Steve Baker	SB	NESO	NESO Representative
Alan Creighton	AC	Northern Powergrid	Workgroup Member (Alternative)
Amanda Rooney	AM	NESO	Observer
Andrew Urquart	AU	SSE Generation	Workgroup Member
Bukky Daniel	BD	EDF Power	Workgroup Member
Graeme Vincent	GV	SP Energy Networks	Workgroup Member (Alternative)
Mark Bowker	MB	National Grid	Workgroup Member
Maria Lopez	ML	NESO	Observer
Roddy Wilson	RW	SSEN Transmission	Workgroup Member
Shaun Pereira	SP	NESO	Observer
Steve Quinn	SQ	NGED	Workgroup Member