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Code Administrator Meeting Summary

Workgroup Meeting 1: GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems

Date: 03 March 2026

Contact Details

Chair: Lurrentia Walker, Lurrentia.walker@neso.energy

Proposer: Dozie Nnabuife, Dozie.Nnabuife@neso.energy

Key areas of discussion

Introduction and Code Modification process

The Chair opened the meeting by outlining the agenda and introducing the Workgroup members. A brief explanation of the code modification process was provided, along with an overview of what is expected from participants.

The Chair outlined the responsibilities of Workgroup members, emphasising constructive and respectful participation, confidentiality, staying within scope, completing actions on time, preparing in advance, helping refine solutions, and voting on whether the proposal supports the code objectives.

Objectives and Timeline

The aim of Workgroup 1 was to agree on the timeline, Terms of Reference, and discuss the proposed solution for the modification. The proposed timeline for GSR 35 includes today's first workgroup meeting, followed by another meeting on 11 March and then meetings every two weeks. The Chair advised the Workgroup that due to the timeline for GRS035, papers for the Workgroup meetings may be issued closer to the meeting date, typically two days in advance rather than the usual five.

Terms of Reference (ToR)

The Workgroup reviewed the ToR's for GSR035. One Workgroup member noted that ToR "d" currently states that the Workgroup should "explain" the rationale and benefits, whereas this responsibility sits with the proposer. The Workgroup member proposed replacing "explain" with "consider," as it is the Workgroup's role is to consider these elements. This amendment will be presented to the Panel in March.

Another Workgroup member raised initial uncertainty regarding the modification's scope. Earlier Code Administrator updates referenced areas such as cascade tripping schemes, which are not reflected in the current materials. Clarification was requested on the intended scope and its potential impact on DNOs, noting that this may be addressed later in the discussion rather than within the Terms of Reference.

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Proposer Presentation:

The Proposer delivered a presentation on GSR035 to the Workgroup. The Proposer explained that this modification aims to review the operational criteria to enhance system access through the appropriate treatment of low probability low impact events and through limited time relaxation of the operational criteria under certain conditions.

The Proposer presented System Access Reform Programme (SARS). The Proposer advised that SARS is a cross-industry programme led by NESO, NGET, SSEN, and Scottish Power. It is driven by recommendations from the Electricity Network Commissioner's 2023 report, which highlighted the need to accelerate transmission build and outage planning.

The Workgroup discussed the following points:

Clarification on Governance of Risk Assessments: Workgroup members noted that if the DNOs or other stakeholders are expected to agree to risk assessment outcomes, the governance must be explicit and may necessitate future Grid Code modifications. The Workgroup agreed that further clarity on obligations for participation and consistency between Scotland and England & Wales.

SQSS Section 5 (Operational Security Planning Rules): The Workgroup discussed introducing flexibility into SQSS Section 5 by permitting a risk-based approach and removing or amending clauses 5.3, 5.4, 5.5 that currently block flexibility. Some Workgroup members expressed concern that removing clause 5.3 / 5.4 appears to reduce security, even if unintentionally. The Workgroup also suggested adding a new clause (5.11.3) allowing relaxation of criteria only when risks are low and mitigations exist, which would require agreement from all affected parties (NESO, TOs, and impacted DNOs/customers).

Concern About Openness of New Clause 5.11.3: The Proposer presented the draft legal text changes for clause 5.11.3. A Workgroup member noted that the proposed clause could be open to interpretation and noted that it might be beneficial to clarify how existing text is interpreted today in both Scotland and E&W.

Implementation Approach: The Proposer advised the Workgroup that the proposed implementation mirrors the previous Frequency Response & Control (FRCR) model.

Case Study discussion: A case study was presented by the NESO SME - (Humber region north south flows) The NESO SME discussed; worst-case double-circuit fault is very low probability (~1-in-39 years), Securing to the *second-worst* fault would increase capability by 1500MW, significant constraint cost savings could result. Workgroup members requested a clearer explanation of consequences and examples showing insecure → secure transitions (not just cost benefits). The Workgroup also recommended that the Proposer/NESO SME bring revised case studies, including Scotland examples.

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Questions from Workgroup Members

Requests from Workgroup members included:

- Clarifying what “unacceptable overloading” means. Explaining how Scotland currently applies risk-based cascade tripping and considering whether changes to Grid Code or STCPs are needed.
- DNOs must be included where impacted and any obligation for DNO participation that may require Grid Code changes.
- Ensure outage decisions and implications are visible to Impacted Users and wider industry.

Alternative Options: A Workgroup member voiced concern that the proposed changes in GSR035 might still reduce SQSS security and questioned whether temporary derogations or alternative tools (e.g., Connect & Manage style mechanisms) had been considered as options instead of modifying SQSS. The Proposer agreed to take this away and provide an update at Workgroup meeting 2.

Cross Code Impacts

The Proposer advised that GSR036: System Access Reform: Review of the voltage limits (voltage limits) is going through SQSS Panel review and impact assessment before consultation. A Workgroup member raised some concerns regarding GSR036, however this will be picked up offline with the Proposer.

The Workgroup discussed whether the changes proposed as part of GSR035 may impact the Grid Code. If the modification requires new steps in the outage planning process, this might require updates to Grid Code obligations and clarification of responsibilities for completing and agreeing risk mitigation forms.

The Workgroup also noted that potential changes to the STC (System Operator–Transmission Owner Code) may be required due to the TO processes.

Next Steps

- Proposer to bring revised case studies, including Scotland examples, Consequence analysis, Clarified terminology.
- Provide interpretation guidance on “unacceptable overloading” in current SQSS.
- Review whether consequential Grid Code changes are required.
- Next Workgroup Meeting – 11 March, 10:00 – 13:00

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Actions

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

Action Number Raised	Workgroup	Owner	Action	Due by	Status
01	WG1	LW	Terms of reference amendment. Submit the proposed amendment to change the word "explain" to "consider" in the TORs reference "d" to the SQSS Panel for approval.	24/03/2026	Open
02	WG1	DN/SP	Case Studies – Prepare additional case studies for next Workgroup. Focussing on "where outages move from in securable to securable and include Scottish practices for comparison.	WG2	Open
03	WG1	DN/SP/NESO/TO Representatives	Clarify and document how "unacceptable overloading" is interpreted and applied in practice by NESO and the TO's in England & Wales and Scotland.	WG2	Open
04	WG1	All WG Members	Legal Text Review - ensuring correct references and alignment.	WG2	Open
05	WG1	DN/AR	Consideration of alternative approaches to SQSS changes: Investigate and report on whether alternative approaches such as temporary derogations or tools similar to connect and manage have been considered instead of deleting the elements form SQSS	WG2	Open
06	WG1	DN	Impact Assessment for GSR036 on Generators: Ensure the impact assessment for GSR036 includes consideration of impacts on generators, particularly nuclear plants.	WG2	Closed

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Attendees

Name	Initial	Company	Role
Lurrentia Walker	LW	NESO, Code Administrator	Chair
Karen Stanton-Hughes	KSH	NESO, Code Administrator	Technical Secretary
Dozie Nnabuife	DN	NESO	Proposer
Steve Baker	SB	NESO	NESO Rep
Saun Pereira	SP	NESO	NESO SME
Alan Creighton	AC	Northern Powergrid	Workgroup Member (Alternative)
Andy Lister	AL	Northern Powergrid	Workgroup Member
Andrew Urquhart	AU	SSE Generation	Workgroup Member
Calum Watkins	CW	Ofgem	Authority Representative
Daniel (Bukky) Oluwabukola	BD	EDF Power	Workgroup Member
Mark Bowker	MB	National Grid	Workgroup Member
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Roddy Wilson	RWi	SSE	Workgroup Member
Steve Quinn	SQ	National Grid Electricity Distribution	Workgroup Member
Observers	Initials	Company	Role
Amanda Rooney	AM	NESO	Observer
Andrew Henderson	AH	NESO	Observer
Matt Chapman	MC	NESO	Observer
Maria Lopez	ML	NESO	Observer
Rui Zheng	RZ	NESO	Observer