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Code Administrator Meeting Summary

Workgroup Meeting 7: GSR035 System Access Reform: Review of the operational requirements on the Onshore Systems

Date: 29 June 2026

Contact Details

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

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

Key areas of discussion

The Workgroup reviewed Appendix K and the proposed Operational Security Criteria Relaxation Assessment (OSCRA) process, including its intended use for limited strategic outages, the respective roles of TOs and NESO, and how much process detail should sit in the SQSS. The main unresolved issue is whether materially affected parties should have an approval role before a relaxation proceeds, or whether this should be addressed through the future OSCRA/risk assessment process.

The Workgroup also noted that consequential Grid Code and STCP modifications will be needed to implement the proposal, and that some members may need to review the wider package before forming a final view. Further Workgroup review will be scheduled before consultation, with an updated timeline to be presented to the SQSS Panel.

Next: The Proposer will progress outstanding Appendix K drafting, including the escalation route and stakeholder agreement points. A further Workgroup meeting will be arranged to review the updated drafting and outstanding actions before consultation launch.

Objectives and Timeline

The Chair confirmed that the timeline will be updated to allow further Workgroup review, consultation preparation and post-consultation review before the Workgroup Report is finalised. The revised timeline will be presented to the SQSS Panel.

Action Log Review

Action 22 and 27: Closed. Work has progressed from considering and aligning the approach to consequential modifications into implementation planning. A new action is to be raised to track raising of the Grid Code modification (targeting July, potentially August), and the subsequent STCP modification.

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Action 28: Open. Remains open until drafting of Appendix K is complete.

Action 29: Open. Remains open until the question on agreement, veto or disagreement is included in the Workgroup Consultation material.

Review Appendix K

Appendix K discussion summary

The Workgroup reviewed Appendix K, which sets out the proposed OSCRA process. Discussion focused on its purpose, TO and NESO roles, the level of detail to include in the SQSS, governance, stakeholder involvement and links to consequential modifications.

Purpose and intended use of Appendix K/OSCRA

The Proposer explained that Appendix K is intended to provide a mechanism for assessing a limited number of strategically important transmission outages that may not meet standard SQSS operational security requirements but could deliver wider system benefits. It is expected to be used infrequently, where the benefits of progressing a project outweigh the additional risks of a temporary relaxation.

Roles of TOs and NESO

The workgroup discussed how the process would be initiated and controlled. The intended approach is for TOs to identify relevant outages, NESO to assess system security implications and decide whether an OSCRA should be undertaken, and TOs to retain the ability to withdraw an outage request.

Some members questioned whether the drafting appropriately balanced TO initiation with NESO discretion. The Proposer explained that NESO discretion is intended to prevent routine or inappropriate use and keep the process focused on significant strategic projects.

Principles versus detailed process design

Members considered whether Appendix K should contain only the high-level OSCRA framework or more detail on how the process will operate. Some favoured clearer principles and minimum requirements in the SQSS, while the Proposer considered that detailed methodology, approvals, escalation and supporting processes should be developed separately.

Governance and stakeholder agreement

Governance and stakeholder involvement remained the main unresolved area. Some members considered that materially affected parties should have a meaningful role where a relaxation could introduce risks beyond those normally accepted under the SQSS and questioned whether consultation alone would provide sufficient protection.

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The Proposer acknowledged these concerns but maintained that detailed arrangements for approvals, stakeholder agreement, escalation and governance should sit within the separate OSCRA or risk assessment process, developed with relevant stakeholders and subject to Ofgem approval.

Consequential Grid Code and STCP modifications

The Proposer confirmed that consequential Grid Code and STCP changes will be needed to fully implement the proposal. Ofgem has requested that modifications are submitted as they are developed and is expected to consider the package holistically once all relevant components are received.

Some members were concerned about forming a view on Appendix K before seeing the full consequential modifications and future OSCRA process, as their position may depend on those supporting arrangements.

Remaining point of disagreement

The main remaining disagreement was whether Appendix K should require affected parties to agree before a relaxation can proceed, or whether approval and escalation requirements should be defined through the future OSCRA and risk assessment process.

The Proposer noted that this is a specific disagreement about stakeholder approval requirements, rather than a fundamental concern with Appendix K as a whole. Differing views will be captured in the workgroup consultation.

Next Steps

The Proposer will progress outstanding Appendix K drafting, including further consideration of Section K.7.1, the escalation route and stakeholder agreement points. A further Workgroup meeting will be arranged for late July to review the updated drafting and outstanding actions.

The Workgroup Consultation will then be reviewed before launch, and the revised timeline will be presented to the SQSS Panel. Ofgem is expected to consider GSR035 alongside the wider package of consequential changes before making a final decision.

Actions

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

Action Number Raised	Workgroup	Owner	Action	Due by	Status
30	7	All	Expansion of Minimum Requirements in Appendix K: Consult with relevant SMEs to develop and propose a list of bullet points for section 7.1 of Appendix K, specifying the minimum requirements for the risk assessment process, and circulate for review prior to the next meeting.		Open
31	7	LW	Confirmation of Ofgem’s Position on Modifications Submission: Email Callum to confirm that Ofgem is comfortable with the approach of submitting modifications as they are ready, and ensure this confirmation is documented in the work group consultation.		Open
32	7	MB	Clarification of Frequency Exclusion in Appendix K: Review and clarify, with technical colleagues, if necessary, how the exclusion of frequency conditions in K1.1 interacts with cascading events at DNO level and whether this could impact the intended use of the process.		Open

Attendees

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

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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
Fraser Scott	FS	SSEN Transmission	Workgroup Member (Alternative)
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Andy Lister	AL	Northern Powergrid	Workgroup Member