

Final Modification Report

GSR037: Formatting and Housekeeping

Overview: This modification aims to make the System Quality of Supply Standard (SQSS) a more readable, user-friendly document.

Modification process & timetable

1	Proposal Form 05 February 2026
2	Code Administrator Consultation 19 May 2026 – 16 June 2026
3	Draft Final Modification Report 14 July 2026
4	Final Modification Report 05 August 2026
5	Implementation 10 BD of Authority Decision

Have 5 minutes? Read our [Executive summary](#)

Have 30 minutes? Read the full [Final Modification Report](#)

Have 80 minutes? Read the full Final Modification Report and Annexes

Status summary: This report has been submitted to the Authority for them to decide whether this change should happen.

Panel recommendation: The Panel has recommended unanimously that the Proposer's solution is implemented.

This modification is expected to have a: Low Impact on Transmission Owners, Offshore Transmission Owners, Distribution Network Operators, National Energy System Operator and the Authority.

Governance route	Standard Governance modification to proceed to Code Administrator Consultation
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Who can I talk to about the change?	Proposer: Stuart McLarnon Stuart.McLarnon@neso.energy 07596579914	Code Administrator Chair: box.SQSS@neso.energy
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What is the issue?

The System Quality of Supply Standard (SQSS) document currently contains a significant number of formatting inconsistencies, structural issues, and referencing errors. These challenges make it difficult to efficiently develop and implement other code modifications, as Users often struggle to navigate and interpret the document in its existing form.

This modification seeks to address these issues by undertaking a comprehensive housekeeping exercise aimed at improving the clarity, consistency, and usability of the SQSS.

Why change?

The SQSS document is not easily accessible and not of a user-friendly standard. This will better support stakeholders when reviewing requirements, drafting changes, and ensuring alignment with the wider suite of industry codes and governance processes.

What is the solution?

The Proposer has drafted an updated SQSS document aimed at improving clarity, accessibility, and ease of use for all stakeholders.

Legal Text

The updates include but are not limited to restructuring the definitions section into a table to improve clarity, renumbering Section J to simplify its layout and align it with the rest of the SQSS and applying consistent formatting across the entire document. The Legal Text can be seen in **Annex 03**.

Issues Not Addressed

A list of issues that were not addressed can be seen in **Annex 02**. These issues will be addressed in a subsequent SQSS modification.

What is the impact of this change?

Proposer's assessment against SQSS Objectives

Relevant Objective	Identified impact
(a) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;	Positive Parties should be better able to review their respective responsibilities within the SQSS
(b) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;	Neutral
(c) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and	Neutral
(d) facilitate Licensees to comply with any relevant obligations under Assimilated law	Neutral

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Neutral
Lower bills than would otherwise be the case	Neutral
Benefits for society as a whole	Neutral

Reduced environmental damage	Neutral
Improved quality of service	Neutral

Code Administrator Consultation Summary

The Code Administrator Consultation was issued on the 19 May 2026 closed on 19 June 2026 and received 4 non-confidential responses and 0 confidential responses, and no late responses. A summary of the responses can be found in the table below, and the full responses can be found in **Annex 04**.

Code Administrator Consultation summary	
Question	
Do you believe that the GSR037 Original Proposal better facilitates the SQSS Applicable Objectives?	Respondents considered that the original proposal better facilitates the SQSS by improving its readability, consistency, usability and clarity. Stakeholders noted that making the standard easier to navigate reduces the risk of parties misinterpreting obligations, and that the draft Legal Text addresses editorial and formatting issues that should make the SQSS easier to read and maintain.
Do you support the proposed implementation approach?	All respondents supported the proposed implementation approach.

Do you have any other comments?	No substantive issues were identified, although several minor formatting and drafting corrections were suggested.
Legal Text issues raised in the consultation	
The summary of the Legal Text issues raised through the Code Administrator Consultation can be found in Annex 06 .	
EBR issues raised in the consultation	
No EBR issues were raised	

Panel Recommendation vote

The Panel met on the 28 July 2026 to carry on their recommendation vote.

They assessed whether a change should be made to the SQSS by assessing the proposed change against the Applicable Objectives.

Panel comments on Legal Text

Ahead of the vote taking place, the Panel considered the Legal Text amendments proposed as part of the Code Administrator Consultation and agree next steps. The suggested changes can be found in **Annex 07**.

Panel comments on EBR impacts

No EBR issues were raised.

Vote 1: Does the Original facilitate the Applicable SQSS Objectives better than the Baseline?

Panel Member: **Alan Creighton, DNO Representative**

	Better facilitates SQSS AO (a)?	Better facilitates SQSS AO (b)?	Better facilitates SQSS AO (c)?	Better facilitates SQSS AO (d)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting statement					
The draft legal text addresses multiple editorial and formatting issues that should make the SQSS easier to read and modify in the future. The Code Administration Consultation pack included a helpful list of outstanding issues. Further issues, reasonably considered more material than housekeeping issues, were identified during the Code Administration Consultation. It is important that these issues are collated so that they can be addressed by a subsequent SQSS modification.					

Panel Member: **Garth Graham, Generation Representative**

	Better facilitates SQSS AO (a)?	Better facilitates SQSS AO (b)?	Better facilitates SQSS AO (c)?	Better facilitates SQSS AO (d)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting statement					

Panel Member: **Antony Johnson, NESO Representative**

	Better facilitates SQSS AO (a)?	Better facilitates SQSS AO (b)?	Better facilitates SQSS AO (c)?	Better facilitates SQSS AO (d)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting statement					
We believe that the original proposal better facilitates the SQSS objectives by improving its clarity, consistency, syntax and ease of use. We believe that making the standard easier to navigate reduces the risk of parties misinterpreting obligations, and that the proposed legal text addresses editorial and formatting issues that should make the SQSS easier to read and maintain.					

Panel Member: **Le Fu, NGET Representative**

	Better facilitates SQSS AO (a)?	Better facilitates SQSS AO (b)?	Better facilitates SQSS AO (c)?	Better facilitates SQSS AO (d)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting statement					
This modification has enhanced the accuracy of texts in SQSS and removed ambiguities, resulting in a clearer and more consistent document.					

Panel Member: **Mike Lee , OFTO Representative**

	Better facilitates SQSS AO (a)?	Better facilitates SQSS AO (b)?	Better facilitates SQSS AO (c)?	Better facilitates SQSS AO (d)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting statement					

Panel Member: **Bless Kuri, SHET Representative**

	Better facilitates SQSS AO (a)?	Better facilitates SQSS AO (b)?	Better facilitates SQSS AO (c)?	Better facilitates SQSS AO (d)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes
Voting statement					
Improving the formatting of the SQSS should make the document easier to navigate and use, helping stakeholders identify and interpret requirements more efficiently. We agree that the proposal is administrative housekeeping in nature and does not materially affect Objectives (b), (c) or (d).					

Panel Member: **Graeme Vincent, SP Transmission Representative**

	Better facilitates SQSS AO (a)?	Better facilitates SQSS AO (b)?	Better facilitates SQSS AO (c)?	Better facilitates SQSS AO (d)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes
Voting statement					
Whilst not necessarily better facilitating any of the Applicable Objectives compared to the existing baseline (as it does not alter any of the existing requirements) it improves the readability, comprehension and understanding of the SQSS and therefore has an overall positive benefit.					

Vote 2 – Which Option best meets the Applicable SQSS Objectives?

Panel Member	Best Option	Which objectives does this option better facilitate? (If baseline not applicable)
Alan Creighton	Original	a,
Garth Graham	Original	a,
Antony Johnson	Original	a,
Le Fu	Original	a,
Mike Lee	Original	a,
Bless Kuri	Original	a,
Graeme Vincent	Original	a,

Panel Conclusion

The Panel has recommended unanimously that the Proposer's solution is implemented.

When will this change take place?

Implementation date

10 Business Days after Authority decision.

Date decision required by

As soon as possible.

Implementation approach

No processes or systems affected.

Interactions

☐ Grid Code ☐ BSC ☐ STC ☐ CUSC
☐ European ☐ Other ☐ Other
 Network Codes modifications

No Interactions

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
TSO	Transmission System Operator

Reference material

Annexes

Annex	Information
Annex 01	GSR037 Proposal Form
Annex 02	List of Issues Not Addressed
Annex 03	GSR037 Legal Text (<i>pre-CAC</i>)
Annex 04	GSR037 Code Administrator Consultation Responses

Annex 05	GSR037 Code Administrator Consultation Responses Summary Table
Annex 06	GSR037 Summary of Legal Text queries raised through Code Administrator Consultation
Annex 07	GSR037 Final Legal Text