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Code Administrator Meeting

Summary

Workgroup Meeting 3: GC0176 – Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code

Date: 15 April 2025

Contact Details

Chair: Lizzie Timmins, elizabeth.timmins@nationalenergygyso.com

Proposer: Frank Kasibante, frank.kasibantel@nationalenergygyso.com

Key areas of discussion

The Chair confirmed the purpose of Workgroup 3 was primarily to review the outstanding actions, discuss updates made to the Legal Text, and review the Draft Workgroup Consultation.

Action review

Action 2: The Authority Representative confirmed that Ofgem were uncomfortable including text in the Grid Code that is not in the licence, so have proposed issuing an enduring derogation that would become active should the protocol be called into effect. A NESO SME queried whether the Authority could approve derogations during an emergency meeting prior to DCRP being initialised, which the Authority representative agreed with in principle. The action was closed during the Workgroup meeting. The Authority representative requested that Network Operators provide a list of licence requirements that are likely to need a derogation if DCRP is used, and the reasons why (**Action 07**).

Actions 4, 5, and 6: The Chair noted that the Proposer had provided written updates to Actions 4, 5, and 6. There were no comments from Workgroup members, so the actions were closed during the Workgroup meeting.

Proposer's update

The NESO SME provided an update on the amendments made to the Legal Text since the last Workgroup, including amendments made to OC6, OC7, and the Glossary and Definitions. They confirmed that there are several issues that remain a work-in-progress including:

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- Drafting of new notices in OC6.9 for Demand Control Rotation and amendments to OC7.4.8.
- Updates to the full (industry version) DCRP, summary (public version) DCRP and DDRC schedule.
- Post-modification requirements for the DCRP to be included in the Systems Defence Plan.

Glossary and Definitions

The Chair and NESO SME discussed the definitions that had changed in the Glossary and Definitions document, following input from Workgroup members:

- **Activation Schedules:** The Workgroup discussed whether ‘Activation Schedules’ should be singular or plural, ultimately deciding to keep it as plural due to multiple schedules being sent to DNOs.
- **Demand Control Rotation Period:** The NESO SME confirmed that following comments from Workgroup members, they have removed references to DCRP as an acronym for Demand Control Rotation Period, instead reserving DCRP for Demand Control Rotation Protocol. Demand Control Rotation Period is now a defined term in the Glossary and Definitions document. Following comments from Workgroup members, the Chair noted that the definition should be amended to include a reference to a ‘...stand down notice...’ and a reference to an eight-hour time period after issuing the notice when networks are reconfigured.
- **Emergency Response Team:** The Workgroup discussed the definition of Emergency Response Team, considering various suggestions. The Workgroup noted it would be useful to reference the ESEC definition for consistency, however decided on a different definition due to the draft ESEC not yet being approved.
- **Fast Load Blocks and Load Blocks:** A Workgroup member suggested that references to the unique R, S, T, and U identifiers in the definitions of Fast Load Blocks and Load Blocks should be in parentheses; this was noted by the Chair in the draft.
- **Notices vs Warnings:** The Workgroup discussed the distinction between the use of the terms ‘notices’ and ‘warnings’ as part of the definitions for ‘National Electricity Transmission System Notice – DCRP Imminent’, ‘National Electricity Transmission System Notice – Initiation of DCRP’, and ‘National Electricity Transmission System Notice – DCRP Stand Down’.

The Workgroup confirmed that a ‘warning’ is typically used to alert parties about something that may happen, while a ‘notice’ requires action. The Workgroup agreed the

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sequence of notices, where the initiation notice comes first, followed by the imminent notice, and finally the stand-down notice. The Workgroup also agreed that the terms should be used consistently and appropriately to reflect the actions required, deciding to use 'notices' for all three communications, reflecting the need for action by the Network Operators.

A Workgroup member noted that the timing of these notices and the requirement to notify the market of a power station shutting down will need to be considered, so as not to breach REMIT. The NESO SME confirmed that they will consider when and how these notices are communicated in relation to REMIT.

Draft Legal Text

The NESO SME talked through the amendments made to OC6, following contributions from Workgroup members.

OC6.5.1

The Workgroup noted that a new introductory paragraph in OC6.5.1 was helpful but questioned the timescales used in the text, as the Workgroup Consultation referred to 3 – 24 hours whereas OC6.5.1 referred to more than 24 hours. The Workgroup decided to revise the paragraph to avoid specifying exact timeframes and instead refer to short, medium, and long-term events. The text will be updated by the NESO SME.

OC6.5.5

The Workgroup discussed whether to refer to Demand reduction instructions in terms of percentages or Load Blocks. It was noted that the Legal Text currently refers to both percentages and Load Blocks. The NESO SME suggested that since the definitions of Load Blocks and Fast Blocks already include the percentages, it would be clearer to refer to Blocks in the Legal Text and keep the percentages in the definitions. The Workgroup agreed with this suggestion.

OC6.2.2

The Workgroup discussed whether the exceptions for Grid Supply Points in Scotland were still required in OC6.2.2. The NESO SME suggested that representatives from SSEN and SPN should be consulted, so will take this issue to the next Electricity Task Group (ETG) meeting to obtain input (**Action 08**).

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The Workgroup noted the changes made to OC6.9.5 and OC6.9.7.

OC7

The Workgroup reviewed the table of amendments made to OC7. The NESO SME agreed to update the format of the OC 7 table to ensure clarity and consistency, including changing the order of notices to reflect the sequence of events. A Workgroup member suggested including market participants and Ofgem in the information column to ensure all relevant parties are informed.

Workgroup Consultation

The Chair talked through the comments and questions submitted by Workgroup members to the draft Workgroup Consultation document. The key points addressed were:

- **GB Compliance:** The Workgroup agreed to remove the reference of 'GB Compliance' from the 'Modification drivers' section, as it was unclear what non-compliance would be.
- **Clarification on disincentives:** Workgroup members questioned the use of the term '...disincentivised...' in the 'What is the issue?' section. The Chair redrafted the text and noted that further updates are required to provide a clearer explanation of conflicting obligations and their implications.
- **Authority approval:** In relation to the OC6.9.2 summary, the Workgroup agreed that the Authority should explicitly approve the DCRP, to ensure legal compliance and stakeholder comfort.
- **OC6.9.6:** A Workgroup member questioned the use of '...unduly penalised...' in the summary of OC6.9.6. The Chair noted that this will be reviewed.
- **Transmission Connected IDNOs:** A Workgroup member asked whether the solution should apply to transmission-connected IDNOs. The Workgroup agreed that IDNOs are Network Operators and should be included in the solution. The Chair drafted a specific Workgroup Consultation question to address this point.

Timeline

The Chair discussed whether the contingency Workgroup meeting needs to be changed given the number of Legal Text comments required, as well as potentially amending the overall timeline. The Chair noted they would discuss this with the Proposer and NESO SMEs and update the Workgroup by email.

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Terms of Reference (ToR)

The Chair asked Workgroup members whether the ToR have been adequately discussed, the Workgroup agreed that they had. The Chair noted the following in relation to specific ToR points:

- c) there is a joint Grid Code/Distribution Code Workgroup and they will reach out to IDNOs to respond to the Workgroup Consultation.
- e) the Workgroup have discussed IDNO issues and there will be a Specific Workgroup Consultation question on IDNOs.
- h) LFDD Blocks have yet to be discussed. The Chair noted that this will be discussed at the next Workgroup meeting.

Next Steps

The Chair noted the new Actions and their owners, reiterated that they will discuss the timeline with the Proposer, and confirmed that a summary of this Workgroup meeting and the Actions will be shared with the Workgroup as soon as possible.

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Actions

Action Number	Workgroup Raised	Owner	Action	Due by	Status
02	WG1	SS	Consider whether the Legal Text in OC6.9.5. is applicable within the bounds of the existing licence rather than through primary legislation. <i>Update: LT to arrange call with SS to discuss this prior to Workgroup 3.</i>	WG2	Closed
04	WG2	RS	Provide update on System Defence Plan	WG3	Closed
05	WG2	AM/AC	Liaise to ensure that there are no misunderstandings about the ability to meet the 2-5 minute requirement with fast load blocks in OC6.5.3	WG3	Closed
06	WG2	FK	Confirm Grid Code defined terms in OC6.5.3 and OC6.9.7	WG3	Closed
07	WG3	All	Network Operators to provide a list of the licence requirements that are likely to need a derogation if DCRP is used, and the reasons why.	WG4	Open
08	WG3	JZH	Provide ETG with updates in OC6.5.5 and investigate whether OC6.2.2 is still required.	WG4	Open
09	WG3	RS	Provide OC7 legal text on correct Baseline document without Fax option in tables.	WG4	Open
10	WG3	All	Workgroup members to think of Specific Workgroup Consultation questions prior to next Workgroup meeting.	WG4	Open

Attendees

Name	Initial	Company	Role
Lizzie Timmins	LT	NESO Code Administrator	Chair
Matthew Larreta	ML	NESO Code Administrator	Technical Secretary
Frank Kasibante	FK	NESO	Proposer
John Zammit-Haber	JZH	NESO	NESO SME
Rebecca Scott	RS	NESO	NESO SME

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Alan Creighton	AC	Northern Powergrid	Alternate
Andrew Dudkowsky	AD	NESO	Observer
Andrew McLeod	AM	Northern Powergrid	Workgroup member
Garth Graham	GG	SSE Generation	Workgroup member
Graeme Vincent	GV	SP Energy Networks	Alternate
Harleen Dhillon	HD	NESO	Observer
Jeevan Dhaliwal	JD	Energy Networks Association	Observer (DCode Administrator)
Richard Wilson	RW	UK Power Networks	Workgroup member
Samuel Gray	SG	National Grid Distribution	Alternate
Shilen Shah	SS	Ofgem	Authority Representative