

# **GC0176 – Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code**

Workgroup 7, 18 September 2025

Online Meeting via Teams

# WELCOME

# Agenda

Topics to be discussed	Lead
Welcome	Chair
Review Workgroup Consultation Responses	Chair
Proposer's Update and Legal Text	Proposer
Review Timeline and Terms of Reference	Chair
AOB & Next Steps	Chair

## Public Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared – Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

## Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives



# Workgroup Membership

Role	Name	Company
Proposer	Frank Kasibante	NESO
Workgroup Member	Andrew McLeod	Northern Powergrid
Workgroup Member	Thomas West	National Grid Distribution
Workgroup Member	John Knott	SP Energy Networks
Workgroup Member	Richard Wilson	UKPN
Workgroup Member	Paul Turner	Electricity North West Ltd
Workgroup Member	Garth Graham	SSE Generation
Workgroup Member	Can Li	Green Gen Cymru
Workgroup Member	Paul Murray	Scottish and Southern Electricity Networks
Observer	Mark Dunk / Jeevan Dhaliwal	ENA
Authority Representative	Shilen Shah	Ofgem

# Review Workgroup Consultation Responses

Lizzie Timmins – NESO Code Administrator

# Workgroup Consultation Summary

The Workgroup Consultation ran from 28 July 2025 – 26 August 2025 and received 6 non-confidential responses, consisting of responses from one Generator, one System Operator and four Distribution Network Operators (two of which are Independent Distribution Network Operators).

Applicable Grid Code Objective	Number of respondents who believed the Original better facilitates each objective
i	5
ii	0
iii	5
iv	4
v	2
None	1

5 out of 6 respondents supported the proposed implementation approach. One respondent had concerns with the implementation timescales, advising that Distribution Code changes need to be implemented and noted that they would like the derogation process finalised before the modification is implemented.

No Alternative Requests were raised as part of the Workgroup Consultation.

# Workgroup Consultation Summary

5 out of 6 respondents indicated that the draft legal text satisfies the intent of the modification, however some had specific comments on the legal text.

5 out of 6 respondents agreed with the Workgroup's assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code, with one respondent not commenting on the question.

5 out of 6 respondents agreed that transmission connected IDNOs should be included within the proposed solution, with some respondents noting that including all transmission connected Network Operators ensures that all connected consumers are treated equitably during an energy emergency. One respondent noted that issues associated with distribution connected IDNOs have not been addressed in the modification.

One respondent did not agree that transmission connected IDNOs should be included in the solution, noting concerns with IDNOs achieving control response times in OC6. Another respondent had concerns about the interface between DNO and IDNO networks.

One respondent raised concerns with objective ii, noting the potential for the solution to favour customers connected to embedded networks.

All respondents agreed that it is appropriate for Ofgem to approve derogations for DNOs in the event they cannot meet their licence obligations due to facilitating use of DCRP.



# Key Issues for Workgroup to address:

- Legal text comments / queries
- Derogation application (applicable to DNOs only) and consideration of whether a license change is required instead of a derogation
- Consideration of issues associated with distribution connected IDNOs and whether these Users can be addressed within the solution
- Consideration of whether implementation timescales are realistic, given DCode changes and DNO/IDNO interaction comments
- Further consideration of whether transmission connected IDNOs should be included in the solution, given the feedback received on control response times and arrangements between DNOs and IDNOs
- Consideration of the interaction between LFDD and DCRP
- Consideration for DCRP testing

# Proposer's Update and Legal Text

Rebecca Scott – NESO



# Proposer Response to Consultation

## Key Issues :

- Legal text comments / queries
  - All have been actioned or brought back to workgroup to discuss.
- Derogation application (applicable to DNOs only) and consideration of whether a license change is required instead of a derogation
  - NESO are happy to support either arrangement.
- Consideration of issues associated with distribution connected IDNOs and whether these Users can be addressed within the solution
  - Outside of scope. Currently being discussed at ETG.
- Consideration of whether implementation timescales are realistic, given DCode changes and DNO/IDNO interaction comments
  - We asked DNOs and took it to ETG to confirm that timescales were reasonable and all DNOs agreed. IDNO timescales – outside of this mod.
  - DCode Administrator (ENA) has been invited to all Workgroups to stay up to date on progress of modification and changes will be made in parallel.
- Further consideration of whether transmission connected IDNOs should be included in the solution, given the feedback received on control response times and arrangements between DNOs and IDNOs
  - Once they are transmission connected, IDNOs have to comply with Grid Code so will have to deliver OC6 obligations.
- Consideration of the interaction between LFDD and DCRP
  - We believe the uniformity of load blocks and the LFDD forecast being made for peak demand covers the eventuality of both being active at the same time. If there are concerns, we'd suggest looking into mapping LFDD zones against DCRP load blocks to understand the implications further.
- Consideration for DCRP testing
  - NESO exercise this as part of the Gas Exercise each year. Is there appetite for something more?

# Voltage Reduction

A NESO SME provided some feedback on voltage reduction to discuss at workgroup. The comments that impact the legal text have been added to the OC6 legal text to discuss.

They also shared their view that voltage reduction being an optional provision is a concern as it has been available to the ENCC for decades and could be the last line of defence before demand disconnection. OC6.5.4 (d) effectively means it could be withdrawn with 10 business days notice.

We believe it is out of scope for this modification. Please [contact Gary O'Hare](#) with any feedback.

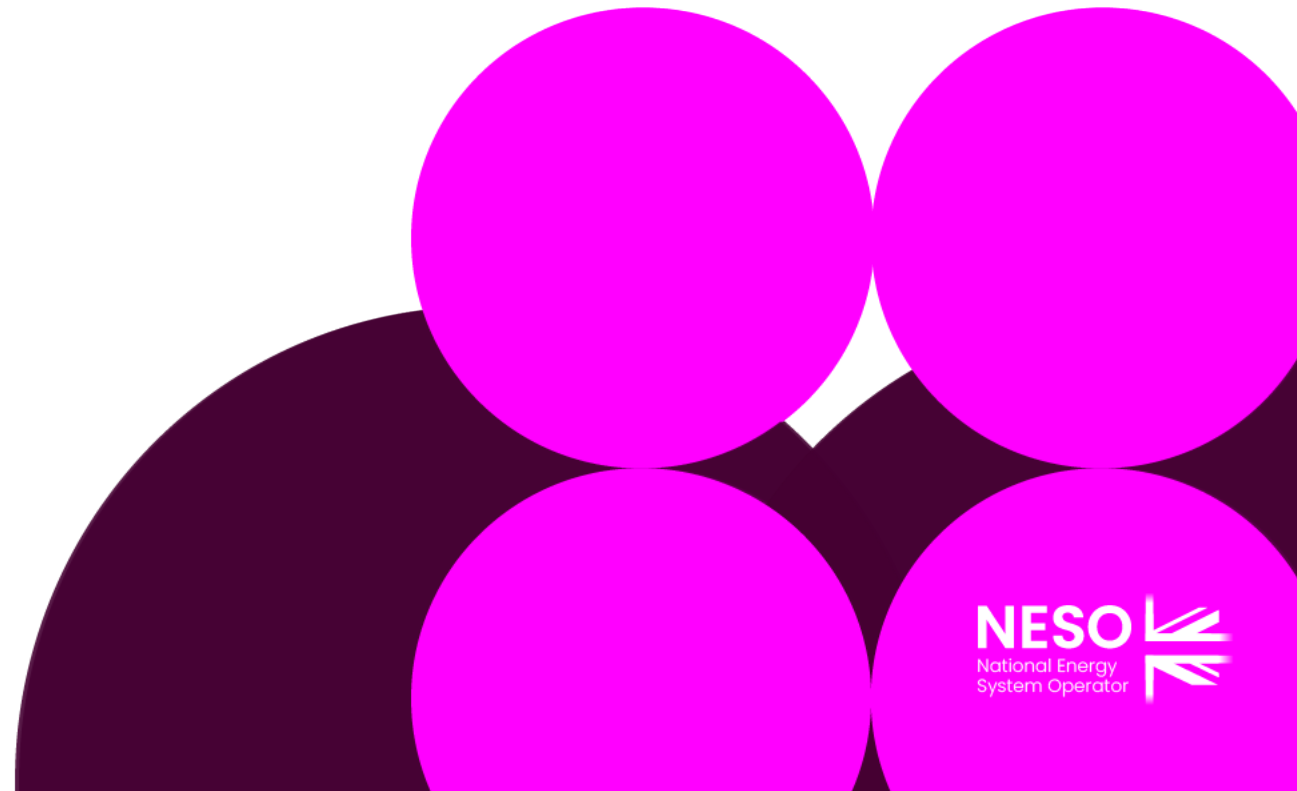
# Legal Text Changes

Amendments have been made to the following legal text areas following consultation responses and a review by NESO's legal team:

- Definitions
  - Fast Load Block – amended to include specific paragraph reference in OC6.
- OC6
  - Minor grammatical amendments.
  - Minor formatting amendments.
  - Minor wording changes following legal review.
  - Questions in legal text comments for Workgroup to consider.
- OC7
  - Minor formatting amendments.
  - Minor grammatical amendments.
  - Question in legal text comments for Workgroup to consider.
- DCRP Summary
  - Tracked changes detail amendments following the legal review.

# Timeline and Terms of Reference Review

Lizzie Timmins – NESO Code Administrator





# Timeline for GC0176

Milestone	Date	Milestone	Date
Modification presented to Panel	12 December 2024	Code Administrator Consultation (1 month)	04 November 2025 to 04 December 2025
Workgroup Nominations (15 business Days)	17 December 2024 – 10 January 2025	Draft Final Modification Report (DFMR) issued to Panel	21 January 2026
Workgroup 1 Workgroup 2 Workgroup 3 Workgroup 4 Workgroup 5 Workgroup 6	03 March 2025 26 March 2025 15 April 2025 22 May 2025 01 July 2025 21 July 2025	Panel undertake DFMR recommendation vote	29 January 2026
Workgroup Consultation (15 business days)	28 July 2025 to 26 August 2025	Final Modification Report issued to Panel to check votes recorded correctly	03 February 2026 to 10 February 2026
<b>Workgroup 7</b> Workgroup 8	<b>18 September 2025</b> 08 October 2025	Final Modification Report issued to Ofgem	11 February 2026
Workgroup report issued to Panel (5 business days)	22 October 2025	Ofgem decision	TBC
Panel sign off that Workgroup Report has met its Terms of Reference	30 October 2025	Implementation Date	10 Business Days after Ofgem decision

# Terms of Reference Review

Workgroup Terms of Reference	
a)	Implementation and costs;
b)	Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text;
c)	Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report; and
d)	Consider implications to sections linked to the Regulated Sections of the Grid Code;
e)	Consider the implications for Network Operators (DNO/iDNO's) of the modification proposal, including the design and implementation of the Demand Control Rotation Protocol;
f)	Consider how the Demand Control Rotation Protocol (DCRP) will be instructed;
g)	Consider the ownership and governance of the Demand Control Rotation Protocol;
h)	Review the proposal to ensure there are no unintended consequences with other aspects of OC6; for example, overlap and / or interaction between OC6 demand control / disconnection blocks, LFDD blocks and Demand Control Rotation Protocol rotation blocks.
i)	Identify DNO/iDNO licence / regulatory obligations and incentives could be impacted by the Demand Control Rotation Protocol and whether the Grid Code could exempt a DNO/iDNO from those licence / regulatory obligations and incentives;
j)	Consider whether there are any changes required to the Distribution Code (DCode), particularly DOC6.

# AOB & Next Steps

Lizzie Timmins – NESO Code Administrator

