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Code Administrator Meeting

Summary

Workgroup Meeting 7: GC0176 – Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code

Date: 08 October 2025

Contact Details

Chair: Lizzie Timmins, elizabeth.timmins@neso.energy

Proposer: Frank Kasibante, frank.kasibante@neso.energy

Key areas of discussion

The Chair confirmed that the purpose of Workgroup 7 was to review the Workgroup Consultation Responses, discuss the Proposer's update and review the draft Legal Text changes, and review the Timeline and Terms of Reference.

Review Workgroup Consultation Responses

The Chair summarised the Workgroup Consultation responses, noting that:

- Six non-confidential responses were received from one Generator, one System Operator and four Distribution Network Operators (two of which are Independent Distribution Network Operators).
- Five out of six respondents supported the proposed implementation approach.
- One respondent raised concerns with the implementation timescales, noting that they would like the derogation process finalised before the modification is implemented.
- No Alternative Requests were raised as part of the Workgroup Consultation.
- Five out of six respondents indicated that the draft Legal Text satisfies the intent of the modification.
- Five out of six 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.
- Five out of six respondents agreed that transmission connected IDNOs should be included within the proposed solution. 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.

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- 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.

Proposer's Update and Legal Text

Proposer's Response to Consultation

The NESO SME outlined their response to key issues raised in the Workgroup Consultation responses:

- *Legal Text Comments:* All Workgroup member queries have been actioned or will be discussed during the Workgroup meeting.
- *Derogation Application:* NESO supports either derogation arrangement, will be led by DNO's preferences.
- *Distribution-Connected IDNOs:* Considered outside the scope of the current modification. Ongoing work at ETG and in separate guidance documents to address the issue.
- *DCode Changes and Implementation Timescales:* DNOs have agreed the timescales are reasonable, most changes have already been implemented as part of ETG's work on the interactions between DNOs and IDNOs.
- *Transmission-Connected IDNOs:* Confirmed that once IDNOs are connected, they must comply with Grid Code and therefore OC 6 obligations. Supporting documentation was shared and discussed at ETG.
- *LFDD and DCRP Interaction:* Uniformity of load blocks and LFDD forecasts should cover concurrent activation, but further mapping work may be needed to fully understand implications. The Chair added that LFDD changes are being considered under DESNZ's Electricity Shortfall Prioritisation Review, with NESO Control Room managing the risk in the meantime.
- *DCRP Testing:* The use of annual gas exercises and OPTTEL testing are considered sufficient for DCRP testing, with no additional testing requirements identified.

Voltage Reduction

The NESO SME confirmed that voltage reduction is out of scope for this modification. However, another NESO SME has provided some feedback on voltage reduction which has been incorporated into the OC6 draft Legal Text to discuss.

Legal Text Changes

The NESO SME confirmed that several minor grammatical and formatting amendments had been made to the draft Legal Text as a result of the Workgroup Consultation responses. The Chair and NESO SME talked through specific comments from Workgroup members in OC6, including suggestions to reword or remove certain clauses, with changes made by the Chair following agreement from the Workgroup.

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The NESO SME and Workgroup members discussed comments made to OC7, focusing on ensuring consistency in the wording, particularly regarding references to ‘Specified Users’ and ‘Network Operators’. The NESO SME sought confirmation on whether the current wording sufficiently covers all intended recipients and actions. A Workgroup member noted that only Network Operators are currently expected to respond and questioned whether Specified Users should also be required to respond. The NESO SME agreed to consult with NESO colleagues to review and clarify the wording.

Timeline and Terms of Reference Review

Timeline

The Chair proposed revising the timeline by holding the next Workgroup meeting on 08 November 2025. This would delay the Workgroup Report submission to the Panel by a month and also delay the Code Administrator Consultation, but would not impact the DFMR date since the December panel was already going to be missed. The Workgroup supported the revised timeline.

Terms of Reference (ToR)

The Chair led the Workgroup through a review of the ToR to ensure all were addressed before the next Workgroup meeting and Workgroup vote. Key discussion points were:

- a. *Implementation and costs*: The Workgroup agreed that most changes and tools were already in place, so no significant new costs are expected. Ofgem may incur some costs for derogations.
- b. *Legal Text*: The Workgroup confirmed the draft Legal Text had been thoroughly discussed and would be finalised in the next Workgroup meeting.
- c. *Stakeholder engagement*: The Workgroup noted efforts to involve IDNOs and ensure representation.
- d. *Regulated sections*: The Workgroup agreed that discussions around interactions with NCER and the addition of OC 6.9 to the mapping table in Annex GR satisfies this ToR.
- e. *Network Operator implications*: The Workgroup agreed that design and implementation work has already completed as part of the original protocol.
- f. *Instruction process*: The Workgroup agreed that notices and processes satisfy this ToR.
- g. *Governance*: The Workgroup agreed that ownership and review processes are included in OC6.9.2
- h. *Unintended consequences*: The Workgroup agreed that this ToR has been adequately discussed during draft Legal Text, LFDD, and timescales discussions.
- i. *DNO/IDNO licence and regulatory obligations*: The Workgroup noted that this ToR has been discussed extensively as part of the derogation discussions.
- j. *DCode*: The Workgroup agreed that DCode changes have been discussed previously, particularly during this Workgroup.

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ETG query

A Workgroup member asked if the ETG query about IDNOs was being handled in this Workgroup or by ETG, noting it was raised by an IDNO Workgroup member and related to technical arrangements and responsibilities. The NESO SME confirmed that this query is outside the scope of this modification but is being addressed in ETG.

The Workgroup noted that transmission-connected IDNOs must comply with Grid Code OC6, and operational arrangements for distribution-connected IDNOs are covered in G88 guidance. The Workgroup agreed that this modification does not worsen the IDNO situation, with any outstanding issues addressed separately.

Next Steps

The Chair confirmed that invitations for Workgroup meeting 8 will be sent shortly, along with a revised Workgroup Report. The Chair will also speak to Ofgem to clarify whether the ENA can apply for derogation themselves or if it could be coordinated through them on behalf of their members.

Actions

Action Number	Workgroup Raised	Owner	Action	Due by	Status
16	WG7	LT	Contact SS to identify whether DNOs will need to apply for derogations separately or if through the ENA is sufficient	WG8	Open
17	WG7	RS	Reach out to AC on OC7 queries	WG8	Open
18	WG7	JZH	Look into IDNO issue outside the scope of GC0176 Workgroup and determine whether activation schedules need to be issued for Transmission Connected IDNOs. Also include OC6 in Bilateral Agreements with Transmission Connected IDNOs.	Ongoing	N/A

Attendees

Name	Initial	Company	Role
Lizzie Timmins	LT	NESO Code Administrator	Chair
Matthew Larreta	ML	NESO Code Administrator	Technical Secretary
Amanda Rooney	AR	NESO	Proposer (Alternate)
John Zammit-Haber	JZH	NESO	NESO SME

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Rebecca Scott	RS	NESO	NESO SME
Andrew McLeod	AM	Northern Powergrid	Workgroup member
Andrew Urquhart	AU	SSE Generation	Alternate
Graeme Vincent	GV	SP Energy Networks	Alternate
James Hall	JH	NESO	Observer
Jeevan Dhaliwal	JD	ENA	Observer (DCode Administrator)
Matthew Dixon	MD	NESO	Observer
Richard Wilson	RW	UKPN	Workgroup member