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Workgroup Consultation Response Proforma

GC0176: Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to grid.code@neso.energy by **5pm** on **26 August 2025**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact grid.code@neso.energy

Respondent details	Please enter your details	
Respondent name:	Rob Ballentine	
Company name:	National Grid Electricity Distribution	
Email address:	Rballentine@nationalgrid.co.uk	
Phone number:	07921069398	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be

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shared with the Panel or the industry for further consideration)

For reference the Applicable Grid Code Objectives are:

- i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- ii. Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);*
- iii. Subject to sub-paragraphs* (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;*
- iv. To efficiently discharge the obligations imposed upon the licensee by this license* and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and*
- v. To promote efficiency in the implementation and administration of the Grid Code arrangements*

** See Electricity System Operator Licence*

For reference, (for consultation question 6) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:

- a) fostering effective competition, non-discrimination and transparency in balancing markets;*
- b) enhancing efficiency of balancing as well as efficiency of national balancing markets;*
- c) integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
- d) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*

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- e) *ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
- f) *facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
- g) *facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

What is the EBR?

The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.

The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe's security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the NESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem.

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions

1	Do you believe that the Original Proposal better facilitates the Applicable Objectives	Mark the Objectives which you believe the Original Solution better facilitates than the current baseline:	
		Original	<input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input checked="" type="checkbox"/> v

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	versus the current baseline?	<input type="checkbox"/> None ii) Facilitating effective competition – Concerns regarding the implementation of OC6 (voltage reduction and/or demand disconnection) in an embedded network (e.g., IDNO networks etc. that are embedded in DNO networks. In these circumstances additional time delays associated with the initiation and completion of these actions can be expected and there is no recognition or allowance for this within the Grid Code or Distribution Code. Given this, there is an argument that Customers that are connected to embedded networks (e.g., IDNO networks and OAD networks) could be favoured (i.e., not included within voltage reduction and demand disconnection plans/procedures) over Customers directly connected to User Systems (i.e., DNO networks). iv) Yes, as long as OFGEM still permits this as discussed in working group.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 2) However, we are not convinced that the implementation timescale is practical. The proposal highlights those changes are likely to be needed to the Distribution Code. In our opinion these changes, in particular those to address the DNO/IDNO interaction issues that we have raised need to be completed before GC0176 is implemented. We also note that OFGEM have agreed that a derogation is required, we would like this process formalised and requirements on the DNO agreed before the mod is implemented.
3	Do you have any other comments?	3) OC6.3.2.3(b) – Unless we have misinterpreted this clause there seems to be no recognition of Customers that are within IDNO or OAD networks, i.e., networks embedded within User Systems . Are these considered to be directly connected to the NETS ?

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		<p>OC6.5.4(a)iii. – There is no allowance for, or recognition of, longer time delays where demand disconnection is implemented across a DNO/IDNO or OAD boundary.</p> <p>OC6.5.4(b)iii. – There is no allowance for, or recognition of longer time delays where voltage reduction is implemented across a DNO/IDNO or OAD boundary.</p> <p>OC6.5.8 – There is no allowance for, or recognition of longer time delays where restoration is implemented across a DNO/IDNO or OAD boundary.</p> <p>OC6.7.6 – There is no allowance for, or recognition of longer time delays where restoration is implemented across a DNO/IDNO or OAD boundary.</p> <p>OC7.4.8.4 - Notices over warnings? Why has the decision been made to use the phrase Notices over Warnings? And could this be aligned?</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
5	Does the draft legal text satisfy the intent of the modification?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>However, would welcome clarification on previously mentioned concerns regarding Distribution Code modification and IDNO/DNO interactions.</p>

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6	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		No Comment

Specific Workgroup Consultation questions

7	The proposed solution currently applies to all Network Operators, which includes transmission connected IDNOs (but not distribution connected IDNOs, as these are implicitly included in the arrangements with DNOs). Do you agree that transmission connected IDNOs should be included? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Yes. we are not, however, convinced that issues associated with indirectly connected IDNOs, i.e., those connected to DNO networks are adequately addressed in the proposals.
8	Do you agree it is appropriate for Ofgem to approve derogations for DNOs in the event they cannot meet their licence	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.

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	obligations due to facilitating use of DCRP?	
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