

Public

## 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](mailto: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](mailto:grid.code@neso.energy)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Garth Graham	
<b>Company name:</b>	SSE	
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<b>Phone number:</b>	01738 456 000	
<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" 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*

Public

*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;*

## Public

- 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
		<p>i – DCRP will be used to manage supply shortages in a controlled and fair manner for the benefit of the GB system.</p> <p>ii – neutral</p> <p>iii – DCRP will be used to manage supply shortages in a controlled and fair manner for the benefit of the GB system.</p> <p>iv – DCRP will ensure that relevant licensees can support the GB system without falling foul of regulatory mechanisms, as long as an enduring solution (such as updating license requirements) is developed by the Authority to coincide with implementation of DCRP.</p> <p>v – neutral</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Although we support the proposal we note the uncertainty around licensee compliance with their regulatory requirements. An enduring solution will need to be developed and published at the same time as the implementation of this proposal (if approved), to ensure licensees are not penalised whilst the GB system benefits.</p> <p>Additionally, there remains uncertainty around the interaction between LFDD and DCRP. It would be wise to better understand this to ensure that consumers are not subject to uncontrolled or unnecessary outages.</p>

## Public

3	Do you have any other comments?	We are mindful that the use of DCRP will likely not occur often. With that in mind would it be worthwhile to developing some form of testing to safeguard the service for when it is needed? We assume that this testing will be taken forward by NESO in consultation with the relevant licensees.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation</a> Section) <input checked="" type="checkbox"/> No <div>Click or tap here to enter text.</div>
5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <div>Click or tap here to enter text.</div>
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <div>Click or tap here to enter text.</div>

## Specific Workgroup Consultation questions

7		<input checked="" type="checkbox"/> Yes
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	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 type="checkbox"/> No
		Including transmission connected IDNO's would allow a consistent approach across all distribution networks, resulting in more efficient ways of working and thus better results for consumers.
8	Do you agree 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		DCRP has large benefits for consumers and the GB system. If there are insufficient provisions for regulatory derogations then the DNO's could be penalised for providing consumer benefits, which wouldn't be right. Rather than approving derogations, we suggest that it would be clearer and more efficient if the relevant licenses were updated to reflect the DCRP requirements.