

# Demand for Constraints Technical Webinar – 5 March 2026

## Q&A pack

The following questions were submitted by the stakeholders during the Demand for Constraints technical webinar on Thursday 5<sup>th</sup> March. This work is part of NESO's latest quarterly update on the ongoing Constraints Collaboration Project (CCP).

### List of Abbreviation

BESS – Battery Energy Storage System

BM – Balancing Mechanism

BMUs – Balancing Mechanism Units

BOA – Bid Offer Acceptance

CBA – Cost Benefit Analysis

CCP – Constraints Collaboration Project

DESNZ – Department for Energy Security and Net Zero

DfC – Demand for Constraints

DNO – Distribution Network Operators

FCLs – Final Consumption Levies

FES – Future Energy Scenarios

GSP – Grid Supply Point

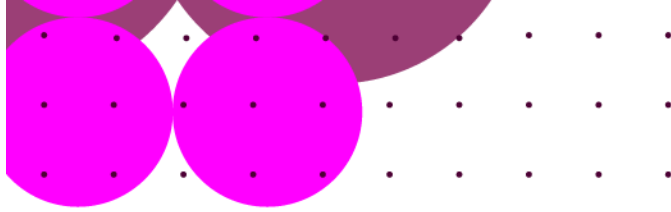
RFI – Request for Information

NESO – National Energy System Operator

RNP – Reformed National Pricing

SIL – Stable Import Limit

TNUoS – Transmission Network Use of System (TNUoS)



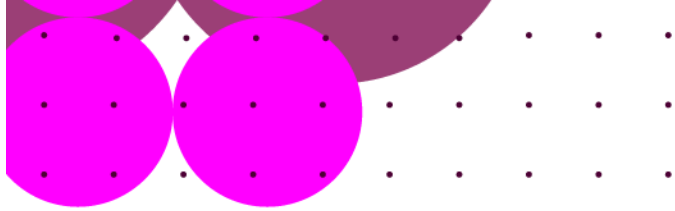
#	Category	Questions	Context / Answer
1	High-level design	What is a GSP group and how customers find out which group they are in?	The Grid Supply Point is defined in the Security and Quality of supply standard (SQSS). GSPs are the interface points between the high-voltage Main Interconnected Transmission System (MITS) and the lower-voltage distribution networks where demand is connected. If your assets are distributed network connected, you will find out the information from the DNO. When aggregating multiple flexible sources into a single unit - for example, across multiple sites - all sources must connect below the same GSP. Your aggregator partner would normally assist with this, but and please reach out via <a href="mailto:box.market.dev@neso.energy">mailto:box.market.dev@neso.energy</a> if you have any specific queries.
2	High-level design	Will NESO consider contracting also in England for assets which could provide a virtual link? i.e. import 100MW in Scotland, and export 100MW in England to provide maximum constraint alleviation?	Current focus for the Demand for Constraints service is considering contracting within areas in Scotland.

#	Category	Questions	Context / Answer
3	High-level design	My reading of what you are saying is that the service only applies to demand that can be called off in the BM. If I was to choose to build my new factory in Scotland rather than England and it just takes baseload demand, I assume that this would not be acceptable, even though new demand would reduce constraints. Have I understood correctly?	Yes, that is correct. (NESO has wider initiatives working across industry to develop national and regional strategic energy plans and reviewing locational effects and potential long-term benefits of planning both generation and baseload demand.) Our aim for Demand for Constraints is to incentivise more flexible demand that can be available to turn up during times of transmission constraint. NESO's focus is therefore to deliver increased demand flexibility available to help the system by participating in markets that can help constraints and consumer bills.
4	High-level design	Given that NESO is primarily looking to procure demand turn-up services in Scotland, have you considered what kinds of plant are likely to bid in? Are you expecting primarily batteries?	<p>We wish to consider the widest range of technologies able to help ease constraints through a sustained flexible response and we recognise a combination of technologies may enable the delivery of a flexibility.</p> <p>We are particularly looking for assets which can offer flexible capabilities and final demand, which means electricity which is consumed other than for the purposes of generation or export onto the electricity network.</p> <p>Example assets that are eligible for Demand for Constraints is Industrial &amp; Commercial demand and flexible electrolysers. This scheme is not intended for batteries and pump storage due to frequent bi-directional dispatch effects and associated need for NESO to intervene with additional redispatch actions</p>

#	Category	Questions	Context / Answer
			in transmission constrained areas. However, the case for batteries may be considered if the assets are behind the meter, co-located with industrial process and the energy is used for final consumption, not for exporting back to the grid.
5	High-level design	Not sure if that was just a slip of the tongue: is this being explicitly limited to Scotland. What about expected constraints in e.g. East Anglia?	<p>Our current focus is Scotland as this is where the vast majority of export constraints are forecasted to happen in the short term. For further information, please see <a href="#">NESO Electricity Ten Year Statement (ETYS)</a>.</p> <p>In future, we will undertake a regular review to assess the level of demand procured via the service and the system's need to determine if additional tenders in different areas needed to alleviate constraints.</p>
6	High-level design	Do responders have to be connected to the Transmission Network, or can they be connected at Distribution level?	At present this is open to both transmission and distribution connected projects.
7	High-level design	Do existing assets qualify for this? It is not clear what "refurbishment" of assets means	<p>Refurbished assets in the context of Demand for Constraints refer to:</p> <ol style="list-style-type: none"> <li>Existing demand assets—such as thermal energy storage or industrial and commercial process assets—that are already connected and constructed and are willing to undergo significant upgrades to extend their operational life so they can provide flexible capacity.</li> </ol>

#	Category	Questions	Context / Answer
			2) Existing demand assets that are currently not operational but could be returned to service and deliver flexible demand capability following appropriate modification or refurbishment.
8	High-level design	Why is this DfC service needed if NESO can already access demand via the BM?	<p>We are seeking to incentivise additional flexible demand on top of existing baseload demand in the BM, to help alleviate thermal constraints. Our aim is to provide commercial incentives for new flexible capacity that would not otherwise exist for instruction during constrained periods.</p> <p>Overall, we want to reduce thermal constraint costs by incentivising assets to locate behind constrained boundaries and by offering revenue support mechanisms that help de-risk investment.</p>
9	High-level design	In the previous demand for constraints slides shared, storage was included as a potential asset class for demand for constraints, it was also said that this market was technology agnostic. Why has this changed? And why can't storage deliver the contract if further measures are put in place?	<p>We wish to consider the widest range of technologies able to help ease constraints through a sustained flexible response and we recognise a combination of technologies may enable the delivery of a flexibility.</p> <p>To ensure the service we design is effective to manage constraints and delivers value to consumers, the Demand for Constraints assets should provide additional, flexible, final demand capability:</p>

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			<p><b>Additional means that</b> DFC targets at the additional flexible capacities of the existing or new demand, over and above their baselines.</p> <p><b>Flexible means that</b> assets have capability to turn up their consumption of electricity at times of constraints with notice from NESO.</p> <p><b>Final demand means</b> electricity which is consumed other than for the purposes of generation or export onto the electricity network.</p> <p>On that basis, the case for batteries may be considered only if the assets are behind the meter, co-located with industrial process and the energy is used for final consumption, not for exporting back to the grid.</p>
10	High-level design	Are you able to exclude energy waste from participation, e.g. through the qualification process?	Yes, we are considering ways in which we could include appropriate controls to avoid wasting energy. We also intend to do prequalification to ensure the MW used support system services.
11	High-level design	just to clarify - will existing flex demand assets already participating in the BM be able to bid for a contract? or do they need to be refurbished in some way?	Existing assets are eligible to participate in the Demand for Constraints scheme as long as they can demonstrate willingness to undergo upgrade to expand their capacity to be flexible.



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			Providers would also need to provide new final demand - whether through a new unit or through expansion of an existing asset allowing it to increase its demand capacity.
12	High-level design	Have you got an indicative breakdown of expected technology types?	<p>To ensure the service we design is effective to manage constraints and delivers value to consumers, the Demand for Constraints assets should provide additional, flexible, final demand capability:</p> <p><b>Additional means that</b> DfC targets additional flexible turn up capacity, over and above your existing final demand baseline.</p> <p><b>Flexible means that</b> assets have capability to turn up their consumption of electricity at times of constraints with notice from NESO.</p> <p><b>Final demand means</b> electricity which is consumed other than for the purposes of generation or export onto the electricity network.</p> <p>Given that, we identified the following technologies suitable for Demand for Constraints: electrolysers, industrial demand and process, district heating, commercial demand, and aggregated demand.</p>

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13	High-level design	Has any consideration been given to the interactions between this and broader Government support for electrification (e.g. BUS, EV grants)	We are working closely with DESNZ to ensure NESO's incentive for providing the flexible demand capacity does not double incentive the same amount that is funded through other government's scheme.
14	High-level design	What (if any) interaction is there between this workstream and DSIT's planned subsidies for data centre electricity in AI growth zone?	DfC team will need to work closely with DESNZ/DSIT in developing their incentive and policy for AI Growth Zone. DfC team will investigate the eligibility of data centres and other assets that are funded through different schemes to ensure they are not double incentivised to provide additional flexible capacity.
15	Technical design	Will participation in DfC provide any degree of protection against being skipped by control room?	<p>A skip occurs when a non-economic dispatch decision is made. If the NESO Control Room sends an instruction via BOA (Bid Offer Acceptance) at a higher price than an alternative action that could have been taken, then NESO will have created a skip, and the alternative action is bypassed.</p> <p>Some skips are unavoidable and are due to asset dynamics and limitations on the transmission system. Other operational actions which optimise the lowest operational cost per day may also show up as skips. To ensure we minimise avoidable skip effects we are investing in learning from more detailed skip analysis to progress towards best practice and best value for end consumers. In addition, NESO is also currently</p>

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			<p>exploring how existing data sources may be of more help to demand providers as they form their own view of locations where future investment may be most beneficial.</p> <p>Our progress in implementing these is now shared and updated in our Skip Rates reporting published by NESO here: <a href="#">Skip rates   National Energy System Operator</a>.</p>
16	Technical design	There may be cases where an energy-consuming asset may be at zero when called, for example, a heat pump or heat battery on an asset meter or a dedicated connection. How will these be treated?	When dispatching from a zero FPN, the first Bid Offer Acceptance (BOA) will ensure the asset to deliver at least its SIL (Stable Import Level) level, while honouring parameters such as the minimum non-zero time (MNZT). For more information, please refer to <a href="#">slide 13 from the webinar slides</a> .
17	Technical design	Is there anything built into the product to prevent BESS or LDES being paid to charge through DfC then seeking to export at time of constraint, thereby exacerbating constraints in later periods? Is that prevented through assets' need to be available to import when there is degree of constraint on system?	<p>The service is targeting final demand so storage units (BESS/LDES) will not be able to participate.</p> <p>However, the case for batteries may be considered if the assets are behind the meter, co-located with industrial process and the energy is used for final consumption, not for exporting back to the grid. If these are considered, the MW of qualifying capacity in this case would also be limited to the increase in final demand over and above the final demand baseline in the counterfactual case of DfC not investing.</p>

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18	Technical design	How will NESO prioritise allocation of DfC instructions given multiple assets that could respond?	If there are multiple DfC or existing BM assets that could respond to a constraint, then the lowest cost units will be used first (merit order) accounting for asset parameters and transmission limitations.
19	Technical design	How effective are NESO's current capabilities for forecasting potential constraints and therefore potential activation by DfC assets?	We have dedicated team Day Ahead Strategy team works with planning team to evaluate constraints at day ahead, offering a clear overview of active constraints and their limits at the DA stage.
20	Technical design	The choice of the BM to dispatch has the advantage that it doesn't fall into the mutualisation anomaly. The risk is that its use won't be sufficiently blended into Control Room working patterns, and skip rates will be high. How will you address that risk?	Skip rates have been reducing as increased functionality has been delivered through Open Balancing Platform (OBP), and further works is being done on this by our <a href="#">Skip Rates programme</a> . We anticipate improvements will continue throughout the intervening period until the DfC contracts go live. (See also the further details in the response to Q. 15).
21	Technical design	Thanks for this NESO team! Does the reliance on the BM dispatch imply that demand that is suitable for DfC must be dispatched 'off' in the wholesale market and be scheduled off 1 hour before delivery at gate closure? Therefore, does this	DfC would be dispatched in real-time and so providers would need to be able to flexibly change their output and reach the instructed volume (which may be the whole contracted volume) in 10 minutes or less. Providers in the BM must finalise their Final Physical Notification (FPN) or planned output, not accounting for any instructions, by gate closure (1-hour before the start of the relevant Settlement Period). We are looking at a process where we would notify at Day Ahead

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		mean it is only suitable for demand that can be flexed on with <1 hour notice? Could you say more about how you expect this to work for DfC demand that also has a day job of running I&C (or other) processes, scheduling their demand ahead of gate closure. Thanks.	when we no longer require the availability to be held for DfC so providers may participate in other markets. We would appreciate any feedback on notice period, time to full delivery etc. for this through the <a href="#">REF</a> .
22	Technical design	Would NESO need to "take control" of an asset or can a customer respond themselves	NESO would directly instruct an asset through a BM Bid-Offer Acceptance - the unit is expected to accept the instruction if it complies with the units' parameters unless there is a safety issue. The asset will be controlled by the provider, but they must follow the instructions.
23	Technical design	If DfC activation fails to deliver constraint relief then will the system/boundary be secured by existing OTS/CMIS action?	DfC constraint relief would be in addition to any existing OTS/CMIS and Balancing Mechanism (BM) actions.
24	Commercial design	Where will the revenue paid to demand providers (for their service) by NESO be recovered from by NESO - TNUoS or BSUoS or something else? Will providers of this service continue to	Providers will continue to receive other signals, such as TNUoS. In terms of the flow of money within Demand for Constraints, we envisage paying demand providers an amount equivalent to the counterfactual balancing costs that would otherwise have been incurred to curtail wind in the BM.

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		receive other signals such as TNUoS and / or Transmission loss reductions?	For further details, please see our answer to Question 34.
25	Commercial design	Is the utilisation payment just what is available through the BM, or will there be a top up?	The utilisation price will be the BOA price available through the BM.
26	Commercial design	In order to construct a business case for participation it would be helpful to know the expected times, volumes and locations of required demand turn-up. Is this available?	We are finalising our internal CBA so we can share our views of general locational requirements, estimated system needs in terms of MW capacities and projected average use frequency. We will communicate this soon. In the meantime, we would like to request industry's inputs for us to better understand if you have business plan in mind so the need and supply can match. Again, we would appreciate if you could share your information by submitting the RFI.
27	Commercial design	Are there any forecasts of expected utilisation?	This is being considered in current CBA and will inform the service commercial design. We will present more information in the near future.

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28	Commercial design	Will there be further tender windows after 2026? Or is this tender designed to fill capacity through into 2030s?	<p>We will be aiming to start tender processes later in 2026, for service delivery window from 2028 to 2040. We'd welcome assets with short and long lead time as long as they join and become operational within the window above. Contract length is subject to:</p> <ul style="list-style-type: none"> <li>• Minimum years for consumer-value return, based on NESO in-house CBA.</li> <li>• Industrial feedback via the RFI based on technology types and business case need.</li> <li>• New assets' connection date.</li> </ul> <p>After that we will undertake a regular review to assess the level of demand procured via the service and the system need to determine if additional requirements needed to alleviate constraints.</p>
29	Commercial design	Will availability payment per MW differ for different types of assets that might have different response times, ramp rates, SIL, hours of availability, recovery periods etc, etc. Or are these effectively pass / fail?	<p>The technical parameters are pass/fail parameters, and the availability payment mechanism is still being developed through our in-house CBA. We are open to the suggestion if the availability payment needs to consider various technical characteristic from different technologies.</p> <p>We are open to any feedback and views on them via the <a href="#">RFI</a>.</p>

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30	Commercial design	Can you give some examples of eligible Capex costs which bidders can seek to recover through DfC and some which would not be in scope?	We are seeking input from providers via the <a href="#">RFI</a> about present market barriers. We intend to listen to our stakeholder needs and in particular we would like to hear what asset investment support could make DfC demand investable and enable effective competition. Contributions could be justified where we can show they help to close a material investability gap, enabling more MW of demand for transmission constraints to be brought forward today.
31	Commercial design	Where a provider is dispatched under DfC to consume energy, will consideration be given to exempting or reducing non-energy costs applied to that consumption?	<p>Government increasingly acknowledges the challenges that Final Consumption Levy (FCL) place on demand and consumers of all types.</p> <p>Policy decisions such as policy cost exemptions are outside NESO's remit. Our role includes influencing policy makers and we continue to highlight multiple barriers to demand turn up flexibility through our <a href="#">Demand Side Flexibility Route to Market Review</a>. Ofgem, DESNZ and NESO committed to looking at solutions to unlock demand turn up in the Clean Flexibility Roadmap (Action 5), including the issue of FCLs.</p> <p>The recent government announcement has identified the need to bring forward measures to help relieve some of the costs as soon as possible (see "Discounted Energy" in the following .Gov release: <a href="#">Government to make "plug-in solar" available within months - GOV.UK</a> ).</p>

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32	Commercial design	Different assets may have to pay different levels of system power costs. Is any account taken of these differences (e.g. FCLs, TNUOS, DUOS etc, etc) in the support?	<p>Please see answer to Q31.</p> <p>Decisions on the design and allocation of policy and network charges sit outside NESO's remit and are ultimately matters for Government and Ofgem. In particular, Ofgem's Cost Allocation and Recovery Review (CARR) is currently considering how energy system costs are recovered from both domestic and non-domestic consumers, including questions of fairness, efficiency, and consistency across different types of demand.</p> <p>NESO will continue to engage with Government and Ofgem on barriers to demand-side flexibility, including the treatment of policy and network charges, and will align the evolution of the DfC service with wider reforms emerging from the CARR and related policy workstreams. In addition, the recent government announcement has identified the need to bring forward measures to help relieve some of the costs as soon as possible (see "Discounted Energy" in the following .Gov release: <a href="#">Government to make "plug-in solar" available within months - GOV.UK</a> ).</p>
33	Commercial design	Are NESO going to conduct an up-to-date CBA following this technical design of the scheme? + how it could interact with other constraint management reforms in Reformed National Pricing?	<p>Yes, we will communicate the updated CBA in the upcoming CCP webinar and the consequential commercial design.</p> <p>On the interaction with other constraint measures, please see our answer to Question 42.</p>

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34	Commercial design	Where will the revenue paid to demand providers (for their service) by NESO be recovered from by NESO - TNUoS or BSUoS or something else?	As the service is in BM, we will see cash flow in BSUoS directly.
35	Commercial design	What volume of MW are you expecting to award availability contracts to as part of this?	As presented in webinar we intend to include an update on the commercial design approach in an upcoming CCP webinar. Any awards will also be subject to a number of procurement gates and assessments to ensure we are following an effective competitive procurement process that delivers value for wider bill payers. We will explain more on this point in future communication.
36	Commercial design	if in merit, will you be paid the BM bid price plus the utilisation fee?	<p>To encourage competition and deliver best value for consumers the utilisation fee will be paid to units dispatched at the BM merit price. Utilisation would therefore be paid at the bid price.</p> <p>For stakeholders interested in exploring wider sources of revenue, our technical design shows how we propose to design DfC to allow units to access to other energy markets as potential sources of any additional revenues at times when DfC does not require the demand turn up to be available.</p>

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37	Commercial design	If there is no "top up" payment on top of BM then the only real benefit is the availability payment. Is that correct??	<p>We would really like your input via the RFI to help us to fully understand how DfC payments can be structured so projects are then investible and help alleviate transmission system constraints. Potential DfC payment mechanisms could comprise a reasonable contribution to costs of refurbishing or building a new flexible demand asset and where justified could also consider elements of non-energy costs associated with NESO instructed electricity turn up, where such costs continue to be demonstrably incurred.</p> <p>We welcome your proposals and any details of what projects need from DfC targeted investment support, so that more flexible demand turn up can be available to the system and continue to receive value by competing and cost-reflectively participating in the BM and via BM payments.</p>
38	Other	Do these FES constraint projections take into consideration major system outages to facilitate the reinforcements?	<p>When modelling Future Energy Scenarios (FES) over long timescales and at a high level, there are uncertainties and hence some assumptions in the long-term forward-looking FES scenarios. Transmission outages plans can change significantly between long term plan and real time delivery, which presents to NESO a better picture at year ahead stage at earliest and this can change when moving to real time. Therefore, the information showing in the slides are indicative when relating to demand for constraints service design. We are looking more deeply at how additional outages may be</p>

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			more fully represented within DfC and projections should still be viewed as indicative.
39	Other	Could NESO please provide a service/market stacking compatibility table.	Thank you for your suggestion. This is currently being worked on, and we aim to communicate when a new stacking table is available.
40	Other	Will any consideration be afforded regarding the potential loss of triad revenues to BESS?	We don't think this is related directly to the Demand for Constraint service; please could you provide more details to <a href="mailto:box.market.dev@neso.energy">box.market.dev@neso.energy</a> so that we can look to pass this on to the relevant team?
41	Other	Given grid connections for demand are becoming increasingly challenging is there any ability for NESO to prioritise flexible connections for these projects that will deliver benefits to constraints? The reality today is that moribund BESS connections are blocking lots of real projects, and this will	<p>We recognise connection challenge is an industry-wide issue and NESO are working closely with government, Ofgem and networks on to find a resolution.</p> <p>The Government is seeking views on proposals to amend the connection process and to implement reforms to the process for managing demand-side connections to the electricity network. Please see the link below to submit your response up to 15 April 2026. <a href="#">Accelerating electricity network connections for strategic demand - GOV.UK.</a></p>

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		continue to be the case for the next 12 months.	To note: connection for embedded demand or distributed-connected demand is currently out of scope of the NESO gated application window and is within DSO remit.
42	Other	How will this service interact with NESO's strategic plans if it aims to incentivise new demand?	<p>Reformed National Pricing (RNP) maintains a single national wholesale price while introducing market reforms to tackle three main challenges that were outlined by DESNZ in summer 2025. DfC is aligning our work with the aforesaid challenges:</p> <ol style="list-style-type: none"> <li>1. Stronger locational investment signals to drive efficient siting of new assets whilst protecting investor confidence and enabling investment at pace.</li> </ol> <p>DESNZ is leading on the pillar for Strategic Spatial Planning levers and the UK Government is the decision maker with NESO active as a key influencer. The DESNZ Delivery Plan will set out and consult on a range of options for these.</p> <ol style="list-style-type: none"> <li>2. Reforms to balancing and dispatch arrangements to improve operational efficiency.</li> </ol> <p>NESO plays a central role across all reforms and is leading on the Balancing and Settlement workstream to reduce volumes of balancing actions and make BM more efficient and reduce consumer bills. This</p>

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			<p>February, we launched a call for input (CFI) on Balancing, Settlement and Dispatch to enable engagement and feedback with industry stakeholders, which runs until 14 April.</p> <p>While the reforms proposed under the CFI helps manage a system with significant levels of redispatch, they do not address the underlying issue of a wholesale market that does not reflect the physical constraints of the system so we are also exploring options to more fundamentally tackle this market design inefficiency.</p> <p>3. Improvements to constraint management to reduce volume and cost of resolving network constraints.</p> <p>On the Constraints pillar of RNP, there is strong ministerial focus on tackling costs out to 2030. The DESNZ Delivery Plan will set out a range of initiatives to do this, some being priorities to get on and deliver, some that need further assessment. NESO is leading on several of these and heavily involved in most. DfC is one such example of a key measure we are considering for its potential to help tackle costs out to 2030.</p>

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43	Other	Where can I get the slides for this webinar (sorry if this has already been covered)	You can find the slides and the webinar recording on CCP website <a href="#">here</a> .
44	Other	Can we move on from referring to signals in the "national market" as not existing - this hints at NESO's previous advocacy position on zonal/nodal pricing which had no evidence of the same relevant investment signals. Subject to my previous Q, this service could support a whole system approach linked to the SSEP, RESP, CSNP, Connections Reform, TNUoS reform, AI Growth Zones - building on my last Q, has this been considered?	On the interaction with RNP, see our answer to question 42.  On AI Growth Zone, DfC team will need to work closely with DESNZ/DBT in developing their incentive and policy for AI Growth Zone. DfC team will investigate the eligibility of data centres and other assets that are funded through different schemes to ensure they are not double incentivised to provide additional flexible capacity.
45	Other	Demand TNUoS is negative in Scotland, but the current rules floor it at zero, so the benefit isn't passed on to Scottish customers. Is NESO considering this as an	NESO supports the policy intent for the reintroduction of locational signals via CUSC modification CMP440. The original solution and its Workgroup Alternative CUSC Modification (WACM) would each in their own way re-introduce the lost siting incentive for demand within its scope. In the development on the solutions, both NESO and other workgroup

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		alternate solution to increase demand in Scotland?	members were mindful of the need to avoid creating an operational signal within charges. As a consequence, the solutions rebase the locational credit in relevant zones, spreading the credit over a longer period than existing TRIADs. Therefore, within the current charging framework, we see a charging solution as complimentary rather than an alternative solution to increase demand in Scotland.
46	Other	How will RFI be distributed/'advertised'?	<p>You can now access the RFI documents on <a href="#">CCP website</a> and submit your response until <b>Wednesday, 1<sup>st</sup> April 2026</b>.</p> <p>When submitting your responses, please follow the steps below:</p> <ol style="list-style-type: none"> <li>1. Review the <a href="#">Demand for Constraints guidance document</a>.</li> <li>2. Submit your responses via the <a href="#">MS Forms link</a>.</li> <li>3. Use the <a href="#">proforma</a> <b>only as a supporting document</b> to help draft your responses.</li> </ol>