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# Code Administrator Meeting

## Summary

### Workgroup Meeting 1: GC0176 – Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code

**Date: 03 March 2025**

#### Contact Details

Chair: Lizzie Timmins, [elizabeth.timmins@nationalenergyso.com](mailto:elizabeth.timmins@nationalenergyso.com)

Proposer: Frank Kasibante, [frank.kasibantel@nationalenergyso.com](mailto:frank.kasibantel@nationalenergyso.com)

### Key areas of discussion

The purpose of Workgroup 1 was primarily to introduce the Workgroup to the modification process, discuss the Proposer’s solution, and agree the Terms of Reference (ToR).

The Chair explained the key elements of the Modification process including:

- the roles and expectations of Workgroup members;
- the requirement for Workgroup members to attend at least 50% of the Workgroup meetings to be eligible for voting;
- the purpose of Alternative Requests and how they are raised and voted on;
- the key milestone events as described in the modification timeline.

### Proposer’s presentation

The Proposer shared slides providing background information, the defect which this modification seeks to address, and the proposed solution. This modification will make changes to Operating Code 6 (OC6) of the Grid Code to allow for the Demand Control Rotation Protocol (DCRP) to be formally recognised as a tool to manage shortfalls in electricity supply, over an extended period of time i.e. 3 to 24 hours.

The Proposer confirmed that as part of their solution, they are seeking to introduce a summary version (with redacted appendices) of the DCRP as part of the Grid Code associated documents, which will be made public, whereas the full version of the DCRP will only be made available to industry. A Workgroup member questioned why the full version can’t be made public. The Proposer and NESO Representative confirmed that there is a security risk to making details of the instruction protocols for DNOs public, so they are limiting their risk by redacting certain content in the version shared publicly.

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## Draft Legal Text

### OC6.9.1

A Workgroup member confirmed that they had already provided comments on the Legal Text. Another Workgroup member shared examples of their comments and agreed to provide their full comments to the Proposer at the conclusion of the Workgroup meeting. One Workgroup member queried whether the obligation for a review every 2 years was too often. One Workgroup member raised concerns that The Company could potentially change the DCRP and expect DNOs to comply with it; they noted that there needed to be a safeguard in the code to ensure stakeholders were consulted on any changes.

### OC6.9.2

The NESO Representative explained the intended use and timing of the proposed new DCRP notices, with Workgroup members discussing the potential of notices being used as triggers prior to the notice instructing the Demand Control Rotation. A Workgroup member confirmed that in their view, market participants would prefer NESO to issue notices directly to industry, rather than for industry to rely on spotting notices shared on social media. Workgroup members noted that rather than the one notice proposed in the Proposer’s solution, there would be a need for a series of notices scheduled at differing times, as follows:

- 7-8 hours ahead, to provide notice of possible Demand Control Rotation;
- A notice to instruct Demand Control Rotation;
- A notice to stop Demand Control Rotation – several Workgroup members noted that this notice could not take effect immediately as the DNO networks would need to be reconfigured to normal.

### OC6.9.3 to OC6.9.6

Workgroup members raised a series of queries related to the proposed intention of the legal drafting and whether it will lead to the intended result, with Workgroup members offering alternative drafting suggestions. The Proposer took an action to consider these comments in preparation for Workgroup Meeting 2.

The Authority Representative noted the importance of understanding which incentives and licence requirements DNOs might not be able to meet during Demand Control Rotation. They suggested that Ofgem could consider ex-post derogations when evaluating incentives. They also mentioned the need to check from a legal perspective whether the text in OC6.9.5 is applicable within the bounds of the existing licence rather than through primary legislation. The

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Authority Representative took an action to consider these issues and provide an update at the next Workgroup Meeting.

### **Amendment to OC6.5.3**

The Proposer explained the introduction of Fast Blocks to the existing Legal Text in OC6.5.3. Workgroup members raised concerns over the number of Fast Blocks and the provision of Voltage Reduction. A Workgroup member stressed the need for clarity and consistency on the number and type of Fast Blocks provided by DNOs. Several DNO Workgroup members confirmed that they have four Fast Blocks available, and they supported the idea of standardising this within OC6. The Proposer took an action to consider this feedback and redraft the Legal Text to reflect the points raised.

### **OC6.5 Review**

The Proposer asked the Workgroup whether there would be a benefit in checking OC6.5 for consistency of terminology and to address discrepancies. Workgroup members suggested that if time allows, a review of existing issues with the Legal Text would be beneficial. The Proposer confirmed that unless the scope is too broad, they will seek to identify existing issues and propose solutions as part of their redraft for this modification.

### **New definitions**

The Proposer talked through the proposed definitions of 'Fast Blocks' and 'Load Blocks' and asked Workgroup members whether there were additional terms required. Workgroup members shared their concerns over the definitions used, suggesting renaming 'Fast Blocks' to 'Fast Load Blocks', asking for clarification on whether the definition of Load Block applies to DNOs or DNOs and IDNOs combined, and whether the approximate percentages and suffix letters used in the Load Blocks definition are appropriate. The Proposer took an action consider these points.

### **Terms of Reference (ToR)**

The Chair summarised the ToR and asked the Workgroup to confirm if they were happy to approve them. There were no comments from Workgroup members.

### **Timeline**

The Chair asked Workgroup members for feedback on the suggested timeline. A Workgroup member asked if an additional Workgroup Meeting could be scheduled following Workgroup

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Meeting 3 on 23 April 2025 and publication of the Workgroup Consultation on 28 April 2025. The Chair took an action to see if Workgroup Meeting 3 could be brought forward and an additional Workgroup Meeting added as a contingency. Workgroup members noted that the current timeline shows submission of the Final Modification Report to Ofgem in October. They queried whether the Chair could accelerate the modification process to seek implementation before October. The Chair took an action to discuss the timeline with Ofgem and update the Workgroup at the next Workgroup Meeting.

## Cross Code Impacts

The Chair noted that this modification has impacts on the Network Code on Emergency Restoration, and the Distribution Code. The Workgroup did not raise any additional cross code impacts. The Proposer noted that Table 2 of Annex GR.B in the Governance Rules would be amended to add the new OC6.9 into the mapping for the Network Code on Emergency Restoration.

## Next Steps

The Chair confirmed that a summary of this Workgroup Meeting and the action points will be shared with the Workgroup as soon as possible, along with issuing calendar invites for the remaining Workgroup Meetings. The Workgroup will reconvene on 26 March 2025 for Workgroup Meeting 2.

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## Actions

Action Number	Workgroup	Owner	Action	Due by	Status
01	WG1	Proposer	Update legal text based on Workgroup feedback, to include the following: <ul style="list-style-type: none"> <li>Review of definitions, including addition of DCRP.</li> <li>OC6.9 further amendments.</li> <li>Modifying OC6.5.3 to reflect 4 fast blocks for each DNO, and identifying voltage reduction as a separate tool.</li> <li>Clarify what will be in scope of a 'housekeeping' review of OC6.5</li> <li>Identify whether a change is required to OC6.5.1</li> <li>Review General Conditions and Governance Rules amendments.</li> </ul>	WG2	Open
02	WG1	SS	Consider whether the Legal Text in OC6.9.5. is applicable within the bounds of the existing licence rather than through primary legislation.	WG2	Open
03	WG1	LT	Discuss possible changes to the timeline with Proposer and Ofgem.	WG2	Open

## Attendees

Name	Initial	Company	Role
Lizzie Timmins	LT	NESO Code Administrator	Chair
Matthew Larreta	ML	NESO Code Administrator	Technical Secretary
Frank Kasibante	FK	NESO	Proposer
John Zammit-Haber	JZH	NESO	NESO SME
Rebecca Scott	RS	NESO	NESO SME
Alan Creighton	AC	Northern Powergrid	Alternate
Andrew McLeod	AM	Northern Powergrid	Workgroup member
Andrew Urquhart	AU	SSE Generation	Alternate
Can Li	CL	Green Gen Cymru	Workgroup member
Garth Graham	GG	SSE Generation	Workgroup member

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Jeevan Dhaliwal	JD	Energy Networks Association	Observer (DCode Administrator)
John Knott	JK	SP Energy Networks	Workgroup member
Mark Dunk	MD	Energy Networks Association	Observer (DCode Administrator)
Paul Goldson	PG	Scottish and Southern Electricity Networks	Alternate
Paul Murray	PM	Scottish and Southern Electricity Networks	Workgroup member
Paul Turner	PT	Electricity North West Ltd	Workgroup member
Richard Wilson	RW	UK Power Networks	Workgroup member
Samuel Gray	SG	National Grid Distribution	Alternate
Shilen Shah	SS	Ofgem	Authority Representative
Thomas West	TW	National Grid Distribution	Workgroup member