



Trisha McAuley OBE  
Independent Chair  
CUSC & Grid Code Panel

Gurpal Singh  
Ofgem  
**By email**

26 May 2023

Dear Gurpal

Grid Code Review Panel (GCRP) Request for Urgency and Recommended Timetable for **GC0161: Changes to OC6 to allow for site protection and demand disconnect rotation.**

On 17 May 2023, the ESO raised **GC0161**. The Proposer sent a request to the GCRP Panel Secretary for this modification to be treated as urgent.

**GC0161** seeks, through minor alterations to OC6, to allow sites to be protected and for demand disconnection to rotate in the event of a supply shortfall.

All documentation for this modification can be located via the following link:

<https://www.nationalgrideso.com/industry-information/codes/gc/modifications/gc0161-changes-oc6-allow-site-protection-and-demand>

The GCRP ("the Panel") on 25 May 2023, considered **GC0161** and the associated request for urgency. This letter sets out the views of the Panel on the request for urgent treatment and the procedure and timetable that the Panel recommends.

The Proposer set out their rationale for Urgency against Ofgem's Urgency criteria (b) and (c), which is as follows:

***b) A significant impact on the safety and security of the electricity and/or gas systems***

If we do not urgently resolve this issue, there is a risk that there is significant impact on the security of the system. This modification will remove the blocker for protecting sites and allowing for demand disconnection to be rotated, ensuring that GB residents are protected, and that the impacts of long demand disconnections are better mitigated.

***c) A party to be in breach of any relevant legal requirements***

If required to act on OC6, and if DNOs won't protect sites, and they are directed by Gov to protect sites, they would be legal ramifications *i.e.*, *DNOs could become non-compliant with OC6, if they were directed by a Government body to protect sites during demand disconnections.*



## Panel Consideration of the Request for Urgency

The Panel considered the request for urgency with reference to [Ofgem Guidance on Code Modification Urgency Criteria](#). The majority view of the Panel is that **GC0161 does meet** Ofgem's Urgency criteria<sup>1</sup>. Therefore, the recommendation of the Panel is that **GC0161 should** be treated as an Urgent Grid Code Modification Proposal.

Panel members set out their rationale behind this decision:

- One Panel Member agreed that there was a significant commercial impact on parties, consumers or other stakeholder(s) and therefore met Ofgem's Urgency criteria (a). They felt that, if DNOs did not protect sites during demand disconnections, this could potentially cause issues across multiple industries.
- Three Panel Members felt that there was a significant impact on the safety and security of the electricity and/or gas systems; and, therefore, met Ofgem's Urgency criteria (b). However, the majority of the Panel (6 Members) did not agree with this view and felt that there was no threat to the safety or security of the system because the volume of demand reduction would not change under this modification, only the parties that were affected by the disconnections.
- Three Panel Members also agreed that DNO's may be in breach of any relevant legal requirements in OC6 if they were to protect sites during these demand disconnections; and, therefore, met Ofgem's Urgency criteria (c).
- The Panel also agreed that GC0161 should be assessed by a Joint DCode/ Grid Code Workgroup.

## Procedure and Timetable

The Panel discussed an appropriate timetable for **GC0161** in the instance that urgency is granted.

The Panel agreed that **GC0161** subject to Ofgem's decision on Urgency should follow the attached Code Administrator's proposed timetable (Appendix 1 **Urgent recommendation**). In Appendix 2 of this letter, the Code Administrator has also provided the timeline if this follows standard timescales with the assumption that the Panel prioritise this high in the prioritisation stack.

The Panel noted that if urgency is required, there would be;

- A Workgroup nomination period of less than 15 working days;

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<sup>1</sup> Ofgem's current view is that an urgent modification should be linked to an imminent issue or a current issue that if not urgently addressed may cause:

- a) A significant commercial impact on parties, consumers or other stakeholder(s); or
- b) A significant impact on the safety and security of the electricity and/or gas systems; or
- c) A party to be in breach of any relevant legal requirements.

## ESO

- A Workgroup Consultation period of less than 15 working days;
- A potential for the Code Administrator Consultation period to be of less than one calendar month (as the solution currently does not impact Regulated Sections);
- Less than 3 clear working days for the Workgroup to review the final Workgroup report.
- Less than 5 clear working days between publication of the Draft Final Modification Report and Panel's recommendation; and
- Less than 5 clear working days for Panel to check that their Recommendation Vote had been recorded correctly.

Under Grid Code Section GR.23.4, we are now consulting the Authority as to whether this Modification is an Urgent Grid Code Modification Proposal.

Please do not hesitate to contact me if you have any questions on this letter or the proposed process and timetable. I look forward to receiving your response

Yours sincerely



Trisha McAuley OBE  
Independent Chair of the CUSC and Grid Code Panel

### Appendix 1– Urgent Timeline

Modification Stage	Date
Request for Urgency Received	17 May 2023
Panel consideration of Urgency	25 May 2023
Workgroup Nominations	26 May 2023 (9am) to 02 June 2023 (5pm)
Ofgem decision on Urgency	02 June 2023 (by 5pm)
Workgroup 1 – Joint DCode and Grid Code	12 June 2023
Workgroup 2 – Joint DCode and Grid Code	20 June 2023
Workgroup 3 – Joint DCode and Grid Code	26 June 2023
Workgroup Consultation	28 June 2023 (9am) to 04 July 2023 (5pm)
Workgroup 4 – Joint DCode and Grid Code	07 July 2023
Workgroup Report issued to Panel	11 July 2023
Workgroup Report presented to Panel	14 July 2023
Code Administrator Consultation Subject to change if solution does not impact Regulated Sections	17 July 2023 to 17 August 2023 (5pm)
Draft Final Modification Report issued to Panel and Industry	22 August 2023
Draft Final Modification Report presented to Panel / Panel Recommendation Vote	24 August 2023
Final Modification Report issued to Panel to check votes recorded correctly	24 August 2023 (2pm to 4pm)

## ESO

Submit Final Modification Report to Authority	24 August 2023 (4pm)
Authority Decision	1 September 2023 (by 5pm)
Date of Implementation	4 September 2023

### Appendix 2 – Standard Timeline

Modification Stage	Date
Workgroup Nominations	5 June 2023 to 26 June 2023 (5pm)
Workgroup 1	12 July 2023
Workgroup 2	09 August 2023
Workgroup 3	06 September 2023
Workgroup Consultation	08 September 2023 (9am) to 29 September 2023 (5pm)
Workgroup 4	11 October 2023
Workgroup Report issued to Panel	18 October 2023
Workgroup Report presented to Panel	26 October 2023
Code Administrator Consultation Subject to change if solution does not impact Regulated Sections	01 November 2023 to 01 December 2023 (5pm)
Draft Final Modification Report issued to Panel and Industry	06 December 2023
Draft Final Modification Report presented to Panel / Panel Recommendation Vote	14 December 2023
Final Modification Report issued to Panel to check votes recorded correctly	15 December 2023
Submit Final Modification Report to Authority	22 December 2023 (4pm)
Authority Decision	TBC
Date of Implementation	TBC

### Appendix 3 – Panel Urgency Vote

See separate attachment.