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<b>Draft Final Modification Report</b>															
<h1 style="margin: 0;">GC0176:</h1> <h2 style="margin: 0;">Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code</h2> <p><b>Overview:</b> The modification will make changes to OC6 to allow for the Demand Control Rotation Protocol (DCRP) to be formally recognised as a tool to manage shortfalls in electricity supply for short term use.</p>	<h3 style="margin: 0;">Modification process &amp; timetable</h3> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; font-weight: bold; background-color: #003366; color: white;">1</td> <td><b>Proposal Form</b> 11 November 2024</td> </tr> <tr> <td style="text-align: center; font-weight: bold; background-color: #003366; color: white;">2</td> <td><b>Workgroup Consultation</b> 28 July 2025 – 26 August 2025</td> </tr> <tr> <td style="text-align: center; font-weight: bold; background-color: #003366; color: white;">3</td> <td><b>Workgroup Report</b> 19 November 2025</td> </tr> <tr> <td style="text-align: center; font-weight: bold; background-color: #003366; color: white;">4</td> <td><b>Code Administrator Consultation</b> 03 December 2025 – 12 January 2026</td> </tr> <tr> <td style="text-align: center; font-weight: bold; background-color: #003366; color: white;">5</td> <td><b>Draft Final Modification Report</b> 18 February 2026</td> </tr> <tr> <td style="text-align: center; font-weight: bold; background-color: #003366; color: white;">6</td> <td><b>Final Modification Report</b> 11 March 2026</td> </tr> <tr> <td style="text-align: center; font-weight: bold; background-color: #003366; color: white;">7</td> <td><b>Implementation</b> 10 Business Days after Decision</td> </tr> </table>	1	<b>Proposal Form</b> 11 November 2024	2	<b>Workgroup Consultation</b> 28 July 2025 – 26 August 2025	3	<b>Workgroup Report</b> 19 November 2025	4	<b>Code Administrator Consultation</b> 03 December 2025 – 12 January 2026	5	<b>Draft Final Modification Report</b> 18 February 2026	6	<b>Final Modification Report</b> 11 March 2026	7	<b>Implementation</b> 10 Business Days after Decision
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<p><b>Have 5 minutes?</b> Read our <a href="#">Executive summary</a></p> <p><b>Have 60 minutes?</b> Read the full <a href="#">Draft Final Modification Report</a></p> <p><b>Have 180 minutes?</b> Read the full <a href="#">Draft Final Modification Report and Annexes</a></p>															
<p><b>Status summary:</b> The Draft Final Modification Report has been prepared for the recommendation vote at Panel.</p>															
<p><b>Panel recommendation:</b> The Panel will meet on 26 February 2026 to carry out their recommendation vote.</p>															
<p><b>This modification is expected to have a: High impact</b> on Network Operators, National Energy System Operator and Customers</p>															
<p><b>Modification drivers:</b> Efficiency, System Security</p>															
<b>Governance route</b>	Standard Governance modification with assessment by a Workgroup														
<b>Who can I talk to about the change?</b>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><b>Proposer:</b> Frank Kasibante, NESO <a href="mailto:frank.kasibante@neso.energy">frank.kasibante@neso.energy</a></td> <td style="width: 50%; border: none;"><b>Code Administrator Chair:</b> Matthew Larreta <a href="mailto:Matthew.Larreta@neso.energy">Matthew.Larreta@neso.energy</a></td> </tr> </table>	<b>Proposer:</b> Frank Kasibante, NESO <a href="mailto:frank.kasibante@neso.energy">frank.kasibante@neso.energy</a>	<b>Code Administrator Chair:</b> Matthew Larreta <a href="mailto:Matthew.Larreta@neso.energy">Matthew.Larreta@neso.energy</a>												
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## Executive Summary

This modification proposes to 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, for short-term use.

### What is the issue?

The DCRP was created in collaboration with industry due to the possibility of tighter winter margins and additional risks. The DCRP is a tool that can be used during short periods e.g. evening peak, where there is a forecast shortfall in supply that requires electricity demand to be managed. The Grid Code does not have sufficient provision for the DCRP to be instructed during a supply shortfall.

### What is the solution and when will it come into effect?

**Proposer’s solution:** The solution involves amending the Grid Code to allow provision for the DCRP to be implemented so that the National Energy System Operator (NESO) can instruct Network Operators accordingly and to clarify existing arrangements relating to electricity Demand reduction. The solution does not apply to Non-Embedded Customers.

**Implementation date:** 10 Business Days following Decision.

### What is the impact if this change is made?

This modification will enable Network Operators to remain compliant with Grid Code obligations when implementing the DCRP. It will also benefit Customers by allowing the use of DCRP, to ensure any one Customer is not turned off repeatedly.

**Workgroup conclusions:** The Workgroup concluded unanimously that the Original better facilitated the Applicable Objectives than the Baseline.

**Code Administrator Consultation:** The Code Administrator Consultation received 4 non-confidential responses.

**Panel recommendation:** Panel will meet on 26 February 2026 to carry out their recommendation vote.

### Interactions

As this modification makes changes to OC6, a Distribution Code Modification will also be required. There is also an impact on the Regulated Sections of the Grid Code (due to changes to OC6.5).

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## What is the issue?

### What is the defect the Proposer believes this modification will address?

Operating Code 6 (OC6) contains the tools which enables NESO and Network Operators to reduce demand on the National Electricity Transmission System to either avoid or relieve operating problems. The tools are designed to be used at no or short notice.

In 2022, due to the possibility of tighter winter margins and additional risks (e.g. geopolitical events), the Demand Control Rotation Protocol (DCRP)<sup>1</sup> was created. It was formalised in 2024 in collaboration with, and endorsement from industry, through the Electricity Task Group (ETG). The DCRP is a tool that can be used during short periods e.g. evening peak, where there is a shortage of supply that requires demand to be managed. The DCRP has been created in line with current OC6 obligations but will be amended in line with the proposed GC0176 changes.

DCRP does not currently exist in OC6, which means there is no formal Grid Code mechanism for using or instructing the DCRP.

The DCRP can be used more flexibly, be initiated quicker and for a shorter duration than the current version of the Electricity Supply Emergency Code (ESEC), reducing the impact on individual Customers compared with the other tools set out on OC6. This is because it is designed to use Load Blocks to ensure that no one Customer is disconnected for an excessive period of time. This will reduce unnecessary risks to GB Customers, especially during winter months.

The DCRP Summary can be found in **Annex 04**.

### Why change?

To enable NESO, during an electricity supply shortfall, to efficiently instruct the Network Operators to utilise the DCRP rather than the ESEC being enacted. This will give NESO

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<sup>1</sup> Due to national security reasons, the full Demand Control Rotation Protocol will not be a publicly available document. A summary of the protocol has been created that will be included in the Grid Code as an associated document.

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more flexibility to manage demand and reduce the impact on individual Customers compared with the other tools set out in OC6.

## What is the solution?

### Proposer’s solution

The DCRP<sup>2</sup> was created in 2024 to manage demand in situations where there is a shortage of supply. It was developed in collaboration with, and with endorsement from industry, through the ETG.

A new section will be created within OC6 (OC6.9) that will introduce the concept of the DCRP and ensure its application is codified. OC6.9 describes how NESO will issue instructions to Network Operators on how to reduce the demand that their networks impose on the National Electricity Transmission System (NETS) which will help manage shortfalls in electricity supply. This includes how the DCRP will be initiated, what demand Network Operators will be required to disconnect, and instructions to stop using the DCRP.

The solution also involves changes to other parts of OC6 to ensure consistency with the new DCRP and to ensure all OC6 tools are co-ordinated. Changes to OC7 were required to outline the issuing of NETS Notices, and associated additions to the Glossary and Definitions were also required.

The solution does not apply to Non-Embedded Customers.

### Legal Text

Details of the draft Legal Text discussions can be found [here](#). The Legal Text for this change can be found in **Annex 03**.

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<sup>2</sup> Due to national security reasons, the full Demand Control Rotation Protocol will not be a publicly available document. A summary of the protocol will be created that will be included in the Grid Code as an associated document.

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## Workgroup considerations

The Workgroup convened 8 times to discuss the identified issue within the scope of the defect, develop potential solutions, and evaluate the proposal in relation to the Applicable Code Objectives.

### Workgroup Discussion ahead of the Workgroup Consultation

The Proposer explained the background and defect of the modification, noting that the modification will make changes to OC6 of the Grid Code to allow for the DCRP to be formally recognised as a tool to manage shortfalls in electricity supply for short term use. The Proposer also noted that extensive engagement had already been undertaken with Network Operators on the DCRP at the ETG prior to raising the modification. In this regard, seven of the eight Workgroup members (plus the Proposer, along with the Observer and the Authority Representative) come from organisations that are members of the ETG and five of the eleven Workgroup participants attended ETG meetings (where the DCRP was discussed).

The Proposer confirmed that as part of their solution, they are seeking to introduce a summary version (with redacted appendices) of the DCRP as a Grid Code associated document, which will be made public, whereas the full version of the DCRP will only be made available to relevant industry parties. One Workgroup member questioned why the full version can't be made public; the Proposer confirmed that there is a security risk to making details of the instruction protocols for Network Operators public, explaining that this risk is mitigated by redacting certain content within the version shared publicly.

The Proposer's initial intention was to list the DCRP Summary within the General Conditions as a Grid Code Electrical Standard. Following legal advice, they confirmed to the Workgroup that as the DCRP Summary is not an Electrical Standard, there was not a need to list it within the General Conditions. They also advised that they proposed to add further clarification within the Grid Code of the obligations on Network Operators, to avoid needing to have an Electrical Standard, and that the DCRP Summary did not have any additional obligations within it. The Workgroup agreed with this approach.

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The Workgroup discussed that the solution does not apply to Non-Embedded Customers but did not rule out the possibility of a future Grid Code modification that may include Non-Embedded Customers in its scope.

### **Cross Code Impacts**

The Chair noted that this modification has an interaction with the Network Code on Emergency Restoration and the Distribution Code. The Proposer noted that Table 2 of Annex GR.B in the Governance Rules would be amended to add the new OC6.9 section into the mapping table for the Network Code on Emergency Restoration (NCER). The Chair advised that this Workgroup was a joint Grid Code / Distribution Code Workgroup and noted that representatives from the Distribution Code Administrator had been invited to act as an Observer on the GC0176 Workgroup.

### **Legal Text Discussions**

Much of the Workgroup discussion revolved around the modification Legal Text, as follows:

#### **Operating Code 6**

**OC6.1.5:** The Workgroup discussed the need to add in a reference to OC6.9 to allow provision for the DCRP to be covered in the clause allowing site protection for pre-designated sites where it is technically feasible to do so. The Proposer agreed to add this to the Legal Text.

**OC6.2.2:** The Workgroup discussed whether the exceptions for Grid Supply Points in Scotland were still required in OC6.2.2. Network Operator representatives requested that this remain in OC6.2.2 rather than being removed.

**OC6.5:** The Proposer noted that NESO legal had highlighted some discrepancies in terminology throughout OC6.5 and asked the Workgroup whether they felt that addressing these would fit into the scope of GC0176. The Workgroup agreed that these could be addressed to provide clarity for Users, given that OC6.5 is proposed to be amended as part of GC0176.

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**OC6.5.1:** The Workgroup noted that a new introductory paragraph in OC6.5.1 was helpful to aid in understanding of what OC6.5 aims to achieve. It was noted that all references within OC6 to OC6.5 would need to be reviewed to ensure they still refer to the correct part.

**OC6.5.4:** The Workgroup discussed the need to separate out Demand Disconnection and Voltage Control to provide clarity to Network Operators. The Workgroup also discussed that the use of four Fast Load Blocks (each of circa 5% of a Network Operator's demand) could be codified as part of Demand Disconnection, rather than the existing three Demand Disconnection stages. This is due to all Network Operators agreeing that they currently have provision for Four Fast Load Blocks to be disconnected in a Demand Control situation. The Network Operators that provide Voltage Reduction noted that they did this in addition to (and not instead of) the four Fast Load Blocks, so the Legal Text was amended to reflect this. OC6.5.3(b) was also amended to change the reference to Grid Supply Points to the Network Operators licensed area, to reflect what happens in practice.

**OC6.5.4-5:** The Workgroup discussed the existing timelines for instructions and whether they were still relevant for the DCRP. Additional notices (and timings) were added within OC6.9. The Workgroup discussion also covered whether the additional 20% demand reduction in OC6.5.4 should come from (non-Fast) Load Blocks and how this should be specified in the text. It was suggested that the text should be amended to specify that the additional 20% demand reduction will come from Load Blocks, rather than Fast Load Blocks. Following this, the Workgroup noted it would be clearer to remove reference to percentages within the text, as this is referenced within the definitions of Fast Blocks and Load Blocks. The Workgroup also noted that the existing timescales within OC6, for additional demand reduction(s), would remain the same. Following feedback from ETG, the Proposer removed provision for the additional 20% demand reduction from OC6, as the view at ETG was that the DCRP should be triggered if more than 20% disconnection is needed. The Workgroup agreed with this stance. The Workgroup discussed that if a notice had not been provided in the correct timescales by NESO, that Network Operators would do their best to provide additional demand reduction, but this could not be guaranteed.

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**OC6.5.6:** The Proposer asked the Workgroup whether they thought any amendments were required in OC6.5.6 due to changes in OC6.5.4 and OC6.5.5. One Workgroup member queried if there was a need to consider whether OC6.5.6 instructions (apart from using 4 Fast Load Blocks) could be issued whilst the DCRP is activated. The NESO Subject Matter Expert (SME) advised of the need to ensure consistency between OC6 and the new DCRP structure. The Workgroup acknowledged the importance of making these changes to maintain clarity and operational effectiveness.

**OC6.5.7:** A Workgroup member suggested that the existing provision in OC6.5.7 might be outdated and could be removed, as the DCRP now provides a structured approach to Demand control. The Workgroup agreed to refine the wording and determine whether to keep or amend OC6.5.7. The Workgroup also discussed that the level of rota disconnections may be different in different areas, and not consistent across Network Operator licenced areas.

**OC6.9.2:** The Original proposed Legal Text suggested a review of the DCRP every two years. One Workgroup member thought that this was too often, so the Proposer amended this to obligate a review every five years. One Workgroup member raised concerns that NESO could potentially change the DCRP and expect Network Operators to comply with it immediately; they noted that there needed to be a safeguard in the Grid Code to ensure stakeholders were consulted on any changes to the DCRP and the Authority should approve those changes given (a) the practical effects on Customers if it was utilised 'in anger' and (b) the interaction with NCER documentation, which requires Authority approval to any changes. The Proposer also agreed that the need to agree any transitional arrangements to reflect any changes to the DCRP should be codified. The Proposer added further detail into OC6.9.2 to outline required engagement with Network Operators on review of the DCRP and for Authority approval of the agreed DCRP.

**OC6.9.3, OC6.9.4, OC6.9.5 and OC6.9.6:** The Proposer explained the intended use and timing of the proposed new DCRP notices. Workgroup members discussed the potential of notices being used as triggers prior to the notice instructing Demand Control Rotation. A Workgroup member, noting the interaction with REMIT, confirmed that in their view, Market Participants would require NESO to issue notices directly to industry, rather than for industry to rely on spotting notices shared, for example, on social media. Workgroup

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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:

- A notice from NESO to all Network Operators (copied to Market Participants) 7–8 hours ahead, to inform Network Operators to make their networks ready for the implementation of the Demand Control Rotation Protocol;
- A notice, from NESO, to each relevant Network Operator (copied to Market Participants) to instruct them to implement the Demand Control Rotation Protocol as per the Activation Schedules;
- A notice, from NESO, to each relevant Network Operator (copied to Market Participants) to instruct them to stop implementing the Demand Control Rotation Protocol (and possibly also to transition to ESEC). Several Workgroup members noted that this notice could not take effect immediately, as the Network Operator’s network might need to be reconfigured to return to ‘business as usual’ normal operations.

These notices were added to the Legal Text by the Proposer following Workgroup feedback. The Workgroup agreed that defining "Demand Control Rotation Period" as a specific term in the Grid Code would be beneficial for clarity and consistency. Network Operators within the Workgroup confirmed that they are able to meet the requirements for timings specified in OC6.9.4. The NESO SME also raised this at ETG to ensure other stakeholders were satisfied.

### **Operating Code 7**

The Workgroup reviewed the amendments made to OC7 Appendix 1 to add the new notices required for the DCRP. One Workgroup member noted that the ‘To: For Information’ column should refer to Market Participants and the Authority for the notices introduced by GC0176, however it was later discussed that Market Participants should be given a summary of the notice, and not issued the full notice, due to security issues. The Workgroup agreed the need to include a section for the types of NETS notices, under OC7.4.8.4, to avoid renumbering. The Workgroup agreed to avoid paraphrasing the notices’ purposes and instead refer directly to the relevant OC6 sections, to prevent confusion and ensure consistency. The Workgroup also agreed that the Appendix 1 tables should be reformatted from portrait to landscape for improved readability.

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**Glossary and Definitions:**

The Workgroup discussed several new proposed definitions required through the introduction of the DCRP. Workgroup members suggested renaming ‘Fast Blocks’ to ‘Fast Load Blocks’ and asked for clarification on whether the definition of Load Block applies to (i) DNOs only or (ii) DNOs and transmission connected IDNOs, and whether the approximate percentages and suffix letters used in the Load Blocks definition were appropriate. The Proposer confirmed that the solution applied to DNOs and transmission connected IDNOs, as all are Network Operators as defined in the Grid Code. One Workgroup member noted that the 4-6% of demand is assumed to be based on the system peak and suggested that the wording should specify this to avoid different interpretations. The Workgroup recognised that this was a complex area and agreed that, at the moment, the existing interpretation would be sufficient. There was also discussion on how Load Blocks are calculated and the consistency around this, however the Workgroup agreed this was out of scope of the modification.

The Workgroup agreed that additional definitions were required for the new notices proposed for the DCRP and also requested that a definition be added for Demand Control Rotation Period for clarity, as this is mentioned within OC6.9.6.

When reviewing the new notices defined to enable the DCRP, the Workgroup discussed the distinction between the terms ‘notices’ and ‘warnings’ in the Grid Code. The Workgroup confirmed that a ‘warning’ is typically used to alert parties about something that may happen, while a ‘notice’ requires action. The Workgroup also agreed that the terms should be used consistently and appropriately to reflect the actions required, deciding to use ‘notices’ for all three new communications, reflecting the need for action by the Network Operators. An appendix was added to Operating Code 6 of the Grid Code to provide further clarity on timings of the three notices and how this may work in a DCRP event.

The Workgroup noted that the notices should specify ‘Relevant Network Operators’ to ensure clarity on who the notices apply to, to account for scenarios where not all Network Operators might be involved.

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The Workgroup also discussed whether multiple Activation Schedules might be issued and how they should be handled, agreeing that the initial Implementation notice would cover the entire period until a Stand Down notice is issued. Subsequent Activation Schedules would be issued as needed.

The Workgroup discussed the timing and clarity of the Activation Schedules and Implementation Notices used in the current definitions. The Workgroup concluded that the final Activation Schedule is the actual switching instruction, and the draft Schedules provide early guidance, and updated the definitions accordingly.

A Workgroup member suggested including a timeline diagram to clarify the sequence of notices and actions. The Workgroup agreed this should exist within OC6.

The Workgroup agreed to future-proof the definition of 'Emergency Response Team' by not specifying the current department name (Department for Energy Security and Net Zero) and instead use 'relevant (UK) government department for energy'.

### **Governance Rules:**

The Workgroup noted that GC0176 has an interaction with the NCER due to changes to OC6.5. The Proposer advised that OC6.9 would be added to the mapping table within Annex GR.B Table 2, which the Workgroup agreed with.

### **Interaction of DCRP with Low Frequency Demand Disconnection (LFDD)**

The Workgroup discussed the overlap between Low Frequency Demand Disconnection (LFDD) and DCRP blocks, especially with high demand disconnection, the consideration needed for customers under both LFDD and DCRP, and the technical challenges of integrating LFDD and DCRP blocks. The Workgroup acknowledged that the LFDD issue is complex and will require further work, but it is beyond the scope of this modification.

### **Options discussed within the Legal Text but not taken forward into the solution:**

The proposed Legal Text within OC6.9 originally included provision for Network Operators to have an exemption from certain obligations and delivery incentives outlined in their licences. The Authority representative noted the importance of understanding which incentives and licence requirements Network Operators might not be able to meet

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during a Demand Control Rotation Period. They suggested that the Authority could consider ex-post derogations when evaluating incentives and also mentioned the need to check from a legal perspective whether the proposed text<sup>3</sup> is applicable within the bounds of the existing licence, rather than through primary legislation. The Authority Representative took an action to consider these issues and provided the Workgroup with a letter previously sent to the Electricity Networks Association (ENA) regarding derogations (**Annex 05**).

Several Network Operator Workgroup members expressed concern with this, noting that even though the DCRP would be beneficial to society, it would not be beneficial for Network Operators to implement it over ESEC due to the lack of protection to them if they fail to meet obligations over a prolonged use of the DCRP. The Proposer advised that they also had this concern and wanted to find a solution which ensured a neutral application (whereby Network Operators were not unfairly penalised in case they were unable to meet their obligations, in the event of implementing the DCRP). Network Operator Workgroup members were asked to consider what licence requirements were likely to require a derogation if the DCRP was used. They indicated that the letter in **Annex 05** would cover the licence requirements that would need a derogation, however noted some practical challenges with meeting obligations.

The Chair provided an update in Workgroup meeting 6 that the Authority representative had indicated the potential for an enduring derogation to be issued alongside a decision on GC0176. The Workgroup agreed to remove the proposed Legal Text<sup>3</sup> within the Grid Code covering the exemption from obligations, however Network Operator Workgroup members stressed that a derogation would be necessary if the DCRP was implemented.

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<sup>3</sup> The proposed Legal Text that was discussed and then removed from OC6 was as follows:  
During a **Demand Control Rotation Period**, it is accepted that **Network Operators** may not be able to meet relevant obligations and delivery incentives in their licences.

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## Workgroup Consultation Summary and Post Workgroup Consultation Discussion

The Workgroup held their Workgroup Consultation between 28 July 2025 – 26 August 2025 and received 6 non-confidential responses and 0 confidential responses. Responses were received from one Generator, one System Operator, and four Distribution Network Operators (two of which are Independent Distribution Network Operators). The full responses and a summary of the responses can be found in **Annex 06**.

### Applicable Grid Code Objectives

The following numbers of respondents believed the Original Proposal better facilitates each applicable objective: 5 for i, 0 for ii, 5 for iii, 4 for iv, 2 for v. One respondent did not indicate that the Original Proposal better facilitates any of the applicable objectives.

*Workgroup feedback:* The Workgroup had no further comments on the Applicable Grid Code Objectives.

### Implementation approach

5 out of 6 respondents supported the proposed implementation approach. One respondent had concerns with the implementation timescales, advising that Distribution Code changes need to be implemented and noted that they would like the derogation process finalised before the modification is implemented.

*Workgroup feedback:* The Workgroup discussed the comments raised in the Workgroup Consultation on the implementation approach, with the Chair noting that the ENA (as the DCode Administrator) was an observer to the Workgroup meetings. The ENA representative noted that the DCode changes could be implemented in line with the Grid Code changes once the Grid Code changes had been finalised. The Workgroup reviewed a draft version of the DCode changes, with one Workgroup member noting that the changes had been made in line with the Grid Code. The Proposer of the modification advised that the implementation timescales are reasonable in their view, which the Workgroup had no further comments on. The Workgroup also discussed the derogation process, noting this had been discussed in previous Workgroups, with one Workgroup member also advising that Network Operators could coordinate through the

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ENA to submit similar derogation applications. At the final Workgroup meeting, the Authority representative clarified that they were in discussions with Network Operator colleagues and the arrangements with respect to any derogation will be taken outside of GC0176.

### **Draft Legal Text**

5 out of 6 respondents indicated that the draft Legal Text satisfies the intent of the modification, however some provided specific comments on the Legal Text.

*Workgroup feedback:* Following the Workgroup Consultation feedback, the Workgroup reviewed the Legal Text, making amendments that were mainly minor, typographical or formatting changes. The Workgroup discussed some comments made in the Workgroup Consultation regarding time delays where demand disconnection is implemented across a DNO/IDNO boundary. The Workgroup discussed this and noted that the timings were not proposed to be changed by GC0176, agreeing that this is an existing issue that needs to be addressed outside the scope of this modification.

### **Assessment of impact to EBR Article 18**

5 out of 6 respondents agreed with the Workgroup’s assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code. One respondent did not comment on the question.

*Workgroup feedback:* The Workgroup had no further comments on the EBR Article 18 impact.

### **Inclusion of transmission connected IDNOs**

5 out of 6 respondents agreed that transmission connected IDNOs should be included within the proposed solution. Some respondents noted that including all transmission connected Network Operators ensures that all connected Customers are treated equitably during an energy emergency. One respondent noted that issues associated with distribution connected IDNOs have not been addressed in the modification.

One respondent did not agree that transmission connected IDNOs should be included in the solution, noting concerns with IDNOs achieving control response times in OC6. Another respondent had concerns about the interface between DNO and IDNO

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networks. One respondent raised concerns with objective ii, noting the potential for the solution to favour customers connected to embedded networks.

*Workgroup feedback:* When reviewing the Workgroup Consultation responses, the Chair advised that they had been in contact with one of the IDNO respondents who noted that their comments on IDNOs achieving control response times in OC6 was an existing issue which was not made worse by the DCRP. The Workgroup also reviewed a document circulated within ETG regarding DNO connected IDNO requirements during OC6. A NESO representative noted that they are investigating OC6 logistics for transmission connected IDNOs and agreed to ensure OC6 was referenced within Bilateral Connection Agreements. The Workgroup also noted that distribution connected IDNOs have agreements directly with Network Operators rather than with NESO. Overall, the Workgroup's view was that arrangements for Distribution connected IDNOs need to be reviewed, but that this is outside the scope of GC0176, and the existing issues are not made worse with the introduction of the DCRP.

### **Ofgem derogation for Network Operators**

All respondents agreed that it is appropriate for Ofgem to approve derogations for Network Operators, in the event they cannot meet their licence obligations due to facilitating use of the DCRP.

*Workgroup feedback:* The Workgroup had no further comments on this, other than what was discussed in previous meetings of the Workgroup, and the comments on the implementation approach.

### **Other comments**

Some respondents noted that interaction with LFDD needs to be considered by the Workgroup, and one respondent also queried whether DCRP testing needs to occur.

*Workgroup feedback:* The Proposer advised that further work on LFDD would be undertaken outside the scope of GC0176, noting it would be led by the Electricity Shortfall Prioritisation Review. They noted that the existing risk could be managed by the NESO control room. In relation to DCRP testing, one Workgroup member noted they thought the existing testing undertaken (annual Gas exercise and regular Optel testing) was sufficient.

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## Terms of Reference Overview

### a) Implementation and costs;

The Workgroup noted that DCRP processes are already being followed since the development of the protocol last year. They advised that negligible costs and changes could be expected to allow for any tweaks required.

### b) Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text;

The Workgroup undertook a significant review of the modification Legal Text. Full discussions can be found [here](#) and [here](#).

### c) Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report; and

The Proposer reached out to IDNOs to ensure they were represented on the Workgroup. IDNOs were also invited to respond to the Workgroup Consultation and invited to join the Workgroup following the Workgroup Consultation, where they had not joined at the beginning of the process. This Workgroup was a joint Grid Code/DCode Workgroup.

### d) Consider implications to sections linked to the Regulated Sections of the Grid Code;

This modification has an interaction with the NCER due to changes to OC6.5. OC6.9 will also be added to the mapping table within Annex GR.B Table 2.

### e) Consider the implications for Network Operators (DNO/iDNOs) of the modification proposal, including the design and implementation of the Demand Control Rotation Protocol;

The Workgroup discussed that the design and implementation of the Demand Control Rotation Protocol was developed when the protocol was designed with ETG. The new NETS notices were also discussed at length within the Workgroup to ensure Network Operators would be informed with sufficient time to prepare.

The Workgroup also advocated for provision within OC6 for 4 Fast Load Blocks to be disconnected instead of the existing 3 Demand Disconnection stages (as Network Operators are able to make more Demand reduction available).

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**f) Consider how the Demand Control Rotation Protocol (DCRP) will be instructed;**

Within OC6.9, provision was added for several notices to instruct the DCRP, which was discussed at length with the Workgroup.

**g) Consider the ownership and governance of the Demand Control Rotation Protocol;**

OC6.9.2 covers the requirement for a review period, transitional arrangements and engagement required for any changes to the DCRP, as agreed by the Workgroup.

**h) Review the proposal to ensure there are no unintended consequences with other aspects of OC6; for example, overlap and / or interaction between OC6 demand control / disconnection blocks, LFDD blocks and Demand Control Rotation Protocol rotation blocks.**

The Workgroup discussed this and made changes to OC6.5.4 to provide clarity on Demand Disconnection and Voltage Control. The Workgroup also discussed that Load Blocks should be used within OC6.5.4 and that the timescales already outlined should not change. The Workgroup have acknowledged that work is required outside the scope of this modification on LFDD, and the NESO control room can manage any existing risk associated with this.

**i) Identify DNO/iDNO licence / regulatory obligations and incentives that could be impacted by the Demand Control Rotation Protocol and whether the Grid Code could exempt a DNO/iDNO from those licence / regulatory obligations and incentives;**

The Workgroup discussed this at length, with the Authority suggesting that Network Operators should submit a derogation application to cover impacted licence / regulatory obligations. Discussions can be found [here](#).

**j) Consider whether there are any changes required to the Distribution Code (DCode), particularly DOC6.**

The Workgroup agreed that changes would be required to the DCode; representatives from the ENA were invited to observe the Workgroup meetings to stay informed on progress, as the Workgroup was formed as a joint Grid Code Review Panel Workgroup / Distribution Code Review Panel Workgroup. The Workgroup also reviewed a draft of the DCode Legal Text.

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## What is the impact of this change?

This modification will enable Network Operators to remain compliant with Grid Code obligations and ensure they are not unfairly penalised if they are not able to meet their obligations, in the event of implementing the DCRP. It will also benefit Customer by allowing the use of the DCRP, to ensure any one Customer is not turned off repeatedly or for an excessive period of time.

## Proposer’s assessment against Code Objectives

Proposer’s assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(i) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;	<b>Positive</b>  DCRP, as a formal tool, shall be used to effectively manage shortfall in supply.
(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);	<b>Neutral</b>
(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;	<b>Positive</b>  DCRP aims to manage the system under events when there is a shortfall in supply to ensure system stability.
(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	<b>Positive</b>  This modification will enable Network Operators

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decisions of the European Commission and/or the Agency; and	to remain compliant to Grid Code obligations and sure they are not disincentivised from other obligations, in the event of a shortfall in supply.
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements.	<b>Neutral</b>

**Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories**

<b>Stakeholder / consumer benefit categories</b>	<b>Proposer's view</b>
Improved safety and reliability of the system	<b>Positive</b> It is aimed at effectively managing scenarios where there has been a shortfall in supply to meet required demand.
Lower bills than would otherwise be the case	<b>Neutral</b> This change will not intend to introduce impacts to consumers' bills.
Benefits for society as a whole	<b>Positive</b> DCRP can be used more flexibly, initiated quicker and for a shorter duration than under the Electricity Supply Emergency Code (ESEC), reducing the impact on individual consumers. This will reduce unnecessary risks to GB consumers, especially during winter months.

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Reduced environmental damage	<b>Neutral</b> It is not anticipated to have negative impacts on the environment.
Improved quality of service	<b>Neutral</b>

## Workgroup Vote

The Workgroup met on 05 November 2025 to carry out their Workgroup Vote. The full Workgroup Vote can be found in **Annex 07**. The table below provides a summary of the Workgroup Members view on the best option to implement this change.

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

The Workgroup concluded unanimously (out of 6 votes) that the Original better facilitated the Applicable Objectives than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	6

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## Code Administrator Consultation Summary

The Code Administrator Consultation was issued on 03 December 2025, closed on 12 January 2026 and received 4 non-confidential responses. A summary of the responses can be found in the table below, and the full responses can be found in **Annex 10**.

Code Administrator Consultation summary	
Question	
Do you believe that the GC0176 Original Proposal better facilitates the Grid Code Applicable Objectives?	<p>All four respondents believed that GC0176 better facilitates applicable objectives (i) and (iii), with three respondents noting that GC0176 better facilitates objective (iv).</p> <p>Respondents noted the greater flexibility that DCRP provide to NESO to manage short term shortfalls in supply. One respondent also noted that DCRP provides a means of applying Demand reduction equitably, ensuring coordination between parties in an energy emergency while providing as much information as possible for customers.</p>
Do you support the proposed implementation approach?	<p>All four respondents supported the proposed implementation approach.</p> <p>One respondent highlighted uncertainty relating to licensee compliance with regulatory requirements and advised of the need for an enduring solution for this. They also advised that they believed there was uncertainty around the interaction between LFDD and DCRP.</p>

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	Another respondent noted the benefits of DCRP in comparison to the current arrangements in the Grid Code.
Do you have any other comments?	One respondent queried whether DCRP testing would be worthwhile to ensure the service works when it is needed.
<b>Legal Text issues raised in the consultation</b>	
No Legal Text issues were raised	
<b>EBR issues raised in the consultation</b>	
No EBR issues were raised; all respondents agreed that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code.	

## Panel Recommendation vote

The Panel will meet on 26 February 2026 to carry out their recommendation vote.

They will assess whether a change should be made to the Grid Code by assessing the proposed change and any alternatives against the Applicable Objectives.

## When will this change take place?

### Implementation date

10 Business Days following approval.

### Date decision required by

As soon as possible.

### Implementation approach

It is envisaged that NESO and Network Operators will need to make minor changes to internal processes to allow the use of the DCRP.

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## Interactions

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> CUSC                   | <input type="checkbox"/> BSC                              | <input type="checkbox"/> STC                 | <input type="checkbox"/> SQSS             |
| <input type="checkbox"/> European Network Codes | <input type="checkbox"/> EBR Article 18 T&Cs <sup>1</sup> | <input type="checkbox"/> Other modifications | <input checked="" type="checkbox"/> Other |

As this modification makes changes to OC6, changes to the Distribution Code are required; this modification has been progressed under a joint Grid Code/Distribution Code Workgroup, with observers on the Workgroup who represent the Distribution Code Administrator.

The Legal Text changes introduced in this modification will impact the Regulated Sections of the Grid Code (due to changes to OC6.5).

If this modification is approved, a change will be required to the System Defence Plan.

## Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DCRP	Demand Control Rotation Protocol
DNO(s)	Distribution Network Operator(s)
EBR	Electricity Balancing Regulation
ESEC	Electricity Supply Emergency Code
ETG	Electricity Task Group
GC	Grid Code
IDNO(s)	Independent Distribution Network Operator(s) <sup>4</sup>

<sup>4</sup> These can be connected at transmission (to the NETS) or connected at distribution (and via a DNO network, to the NETS).

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LLRDP	Low Level Rota Disconnection Plan
NCER	Network Code on Emergency Restoration
NESO	National Energy System Operator
NETS	National Electricity Transmission System
OC6	Operating Code 6 (of the Grid Code)
OC7	Operating Code 7 (of the Grid Code)
RLD	Rota Load Disconnections
SME	Subject Matter Expert
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standard
T&Cs	Terms and Conditions

## Annexes

Annex	Information
Annex 01	GC0176 Proposal Form
Annex 02	GC0176 Terms of Reference
Annex 03	GC0176 Legal Text
Annex 04	DCRP Summary
Annex 05	Ofgem Letter on Rota Load Disconnection regulatory barriers
Annex 06	GC0176 Workgroup Consultation Responses and Summary
Annex 07	GC0176 Workgroup Vote
Annex 08	GC0176 Workgroup Action Log
Annex 09	GC0176 Workgroup Attendance Log

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Annex 10	GC0176 Code Administrator Consultation Responses
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