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Grid Code Modification Proposal Form

GC0176:

Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code

Overview: 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, over an extended period of time (i.e. 3 to 24 hours).

Modification process & timetable

1. **Proposal Form**
   11 November 2024
2. **Workgroup Consultation**
   28 April 2025 – 19 May 2025
3. **Workgroup Report**
   16 July 2025
4. **Code Administrator Consultation**
   29 July 2025 – 29 August 2025
5. **Draft Final Modification Report**
   17 September 2025
6. **Final Modification Report**
   08 October 2025
7. **Implementation**
   10 Business Days after decision

Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

This modification is expected to have a: High impact on

Distribution Network Operators, NESO and Consumers

Modification drivers: Efficiency, GB Compliance, System Security

Proposer's recommendation of governance route	Standard Governance modification with assessment by a Workgroup

Who can I talk to about the change?	**Proposer:** Frank Kasibante Frank.Kasibante1@nationalenergyso.com	**Code Administrator Contact:** Sarah Williams sarah.williams@nationalenergyso.com

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What is the issue?

Operating Code 6 (OC6) contains the tools which enables the National Energy System Operator (NESO) and Electricity Distribution Companies to reduce Demand on the National Electricity Transmission System to either avoid or relieve operating problems. It is designed to be used at no or short notice.

In 2022, due to the possibility of tighter winter margins and additional risks (e.g., recent geopolitical events), the Demand Control Rotation Protocol (DCRP)[1] was created. It was formalised in 2024 in collaboration with, and with endorsement from industry, through the Electricity Task Group (ETG). 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 current protocol has been created in line with current OC6 obligations. However, OC6 restricts how DCRP can be used and does not protect Distribution Network Operators (DNOs) when DCRP is enacted, e.g., reprieve from other incentivised obligations.

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.

Why change?

To enable NESO, during a supply shortfall, to efficiently instruct the DNOs to utilise DCRP, whilst ensuring DNOs are not disincentivised.

What is the proposer's solution?

- Create a new section of OC6 (OC6.9) that will recognise DCRP as a tool in its own right.
- Amendments could also be required to OC6.5.6 (or removed depending on legal text for OC6.9).
- Introduce a summary of what the protocol does as a new Grid Code Associated Document.
- Amend the General Conditions to reference the Associated Document as mentioned above.

Draft legal text

We propose to jointly draft the legal text for OC6.9 with industry via the Workgroup.

Considerations to be included in OC6.9:

- How DCRP will be instructed
- Reprieve for DNOs from other incentivised obligations

[1] 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.

- Ownership of DCRP – Does NESO host the protocol and produce updates in consultation with industry?

What is the impact of this change?

Proposer's assessment against Grid Code Objectives	
Relevant Objective	**Identified impact**
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	**Positive** DCRP, as a formal tool, shall be used to effectively manage shortfall in supply of active power.
(b) 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);	**Neutral**
(c) 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;	**Positive** DCRP aims to manage the system under events when there is a shortfall in supply to ensure system stability.
(d) 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	**Positive** This modification will enable DNOs to remain compliant to Grid Code obligations and sure they are not disincentivised from other obligations, in the event of a shortfall in active power.
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	**Neutral**

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories	
Stakeholder / consumer benefit categories	**Identified impact**
Improved safety and reliability of the system	**Positive** It is aimed at effectively managing scenarios where there has been a shortfall in active power to meet required Demand.
Lower bills than would otherwise be the case	**Neutral** This change will not intend to introduce impacts to consumers' bills.
Benefits for society as a whole	**Positive** 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.
Reduced environmental damage	**Neutral** It is not anticipated to have negative impacts on the environment.
Improved quality of service	**Neutral**

When will this change take place?

Implementation date

1st November 2025

Date decision required by

18th October 2025

Implementation approach

It is envisaged that NESO and Network Operators will need to make minor changes to the initiation of DCRP.

Proposer's justification for governance route

Governance route: Standard governance

Despite having engaged extensively with the Network Operators and presented the draft modification to the Grid Code Development Forum, there is a need to draft the legal text collaboratively.

This modification must be Standard Governance as it is anticipated that legal text changes will impact the NCER (changes to OC6.5).

Interactions

☐CUSC	☐BSC	☐STC	☐SQSS
☐European Network Codes	☐ EBR Article 18 T&Cs[1]	☐Other modifications	X Other

Changes to OC6 are likely to require changes to the Distribution Code and a joint Workgroup is proposed.

It is anticipated that legal text changes will impact the NCER (changes to OC6.5).

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
EBR	Electricity Balancing Regulation
GC	Grid Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions
ESEC	Electricity Supply Emergency Code
DCRP	Demand Control Rotation Protocol
DNOs	Distribution Network Operators
NCER	Network Code on Emergency Restoration
NESO	National Energy System Operator
OC6	Operating Code 6

Reference material

- Electricity Supply Emergency Code