

Ofgem decision to Approve Grid Code GC0176 “Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code”

Decision: The Authority¹ directs² that the proposed modification to the Grid Code be made

Target audience: National Energy System Operator (NESO), the Grid Code Review Panel, Grid Code users and other interested parties

Date of publication: 30 July 2026

Implementation date: 13 August 2026

Background

Grid Code Operating Code 6 (OC6)³ contains the tools which enables NESO and Network Operators to reduce demand on the National Electricity Transmission System (NETS) to either avoid or relieve operating problems. The tools are designed to be used at no or short notice.

During 2023, the Department for Energy Security and Net Zero ran a series of Electricity Shortfall Prioritisation Review (ESPR) workshops, which reviewed and identified improvements in the prioritisation of electricity supplies during a supply shortfall. This included a review of the existing industry Demand Control tools within OC6. We approved two previous Grid Code modifications that stemmed from the ESPR, seeking to make improvements to OC6, GC0161⁴ and GC0162⁵.

¹ References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

³ [Grid Code documents | National Energy System Operator](#)

⁴ <https://www.ofgem.gov.uk/publications/gc0161-authority-decision>

⁵ <https://www.ofgem.gov.uk/decision/gc0162-authority-decision>

The ESPR also reviewed the Governments Electricity Supply Emergency Code (ESEC), which sets out a process for ensuring fair distribution of electricity rationing during a period of electricity shortage. It determined that the ESEC better minimises the impact on individual customers compared to other Demand Control tools set out in OC6 by distributing demand disconnections across the country and rotating the customers off supply.⁶

Existing OC6 demand control tools allow for the disconnection of up to 20% of a Distribution Network Operators (DNOs) total demand via pre-determined load blocks, each nominally 5% of demand, at no or very little notice. Demand disconnections beyond this require day-ahead warnings from NESO, or are delivered on a best endeavours basis, via pre-determined load blocks. This means that the same group(s) of customers are disconnected each time the tools are used.

Under ESEC, each DNO splits 90% of its total demand into 18 pre-determined load blocks, each nominally 5% of demand. These load blocks are to be disconnected according to pre-determined schedules, rotating the blocks disconnected in a nominal 3-hour cycle resulting in Rota Load Disconnections (RLDs). ESEC Load Blocks are also assigned an identifying letter, which is listed on customer bills therefore better facilitating public communications around load disconnections. Subsequently, ESEC demand disconnections are more fairly distributed across the country, better reducing societal impacts, when compared to existing OC6 tools.

ESEC requires the use of Government emergency powers to enact and is designed for use on prolonged electricity supply shortages. It is therefore not suited for short notice use as existing OC6 tools are. The ESPR recommended introducing an ESEC style tool to

⁶ <https://www.gov.uk/government/publications/electricity-supply-emergency-code>

OC6, designed to be initiated as quickly as possible to better reduce the societal impacts of demand disconnections.

The Demand Control Rotation Protocol (DCRP) was created to fulfil this purpose. In 2024, the DCRP was formalised in collaboration with, and endorsement from industry through the Governments Electricity Task Group (ETG). The DCRP does not currently exist in OC6. This modification proposal seeks to implement the DCRP in OC6 such that it can be enacted through Grid Code provisions as per other OC6 tools.

We note that a corresponding Distribution Code modification, DCRP/MP/25/06, to facilitate the DCRPs implementation was progressed alongside this modification. Our decision on DCRP/MP/25/06 is published alongside this decision.

The modification proposal

GC0176 was proposed by the NESO on the 11 November 2024. Prior to this, the DCRP was developed in collaboration with industry via the ETG and ESPR. It has been progressed via a joint Grid Code – Distribution Code working group alongside DCRP/MP/25/06. It seeks to implement the DCRP in OC6.

The DCRP is a Demand Control tool designed in alignment with ESEC, that is initiated by NESO. The DCRP can only be enacted where there is at least 8 hours advance warning of an electricity shortfall, and where relevant NETS Notices have been issued by NESO. This is because DNOs need to reconfigure their networks to facilitate the RLDs.

It uses the same 18 Load blocks as ESEC, totalling 90% of total demand. Like ESEC, up to 10% of total demand is reserved for Protected Sites (sites on the ESEC Protected Sites List, as defined by ESEC) which are excluded from disconnections. Unlike ESEC, 4 blocks, defined as Fast Load Blocks, are reserved for emergency disconnections under

existing OC6 provisions. The remaining 14 blocks, representing 70% of total demand, are made available for demand disconnection in accordance with an Implementation Rota Plan created by NESO for the specific event, with load blocks disconnected in alphabetic sequence on a nominal 3-hour cycle. On receipt of notification of DCRP actuation, DNOs must make 8 Load Blocks available for disconnection within 8 hours, and all 14 Load Blocks available within 24 hours, or as soon as reasonably practicable.

GC0176 proposes to make a number of changes to Grid Code documents to:

- introduce a new section within OC6, OC6.9. OC6.9 sets out the DCRP requirements, how the DCRP will be initiated, what Load Block(s) Network Operators will be required to disconnect, instructions to stop using the DCRP, and the process for updating the DCRP
- introduce a number of new Grid Code definitions relevant to the DCRP, including new NETS Notices issued by NESO to alert users to possible electricity supply shortages, activate and stand down the DCRP
- amend existing OC6 provisions to ensure consistency with the new DCRP and to ensure all OC6 tools are co-ordinated. Notably, assigning 4 Fast Load Blocks to existing OC6.5 provisions for the disconnection of up to 20% of total demand, and arrangements for liaison with NESO for the Load Blocks disconnected where more than 20% of total demand is required to be disconnected
- amend OC7 to outline the issuing of NETS Notices relevant to the DCRP
- introduce a redacted summary version of the DCRP as a Grid Code associated document which will be publicly available. This includes an overview of all OC6 demand control tools and their intended uses. The full DCRP will only be made available to relevant industry parties due to security risks
- amend table 2 of Annex GR.B in the Grid Code Governance Rules to add the new OC6.9 section into the mapping table for the EU Network Code on Emergency Restoration (NCER)

The Proposer considers that GC0176 will better facilitate Applicable Grid Code Objectives (i), (iii), and (iv)⁷, by facilitating better management of the system under events when there is a shortfall in supply to ensure system stability.

Grid Code Review Panel recommendation

The Grid Code Review Panel (the Panel) met on 19 May 2026 to carry out their recommendation vote, unanimously agreeing that the GC0176 better facilitated the Applicable Grid Code Objectives. All nine Panel members considered GC0176 better facilitated Applicable Grid Code Objectives (i) and (iii), and five members considered it better facilitated Applicable Grid Code Objective (iv). All nine members considered GC0176 has neutral impact on all other Applicable Grid Code Objectives.

Our decision

We have considered the issues raised by the modification proposal and in the Final Modification Report dated 1 June 2026. We have considered and taken account of the responses to the industry consultation on the modification proposal which are included in the Final Modification Report.⁸ We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of Applicable Code Objectives (i), (iii) and (iv) of the Grid Code, and will have neutral impact on all other Grid Code Objectives
- approving the modification is consistent with our principal objective and statutory duties⁹

⁷ As set out in Standard Condition E3 of the Electricity System Operator Licence.

⁸ Grid Code proposals, final reports and representations can be viewed on NESO's website at: [Grid Code Modifications](#)

⁹ The Authority's statutory duties are wider than matters which the Grid Code Panel Review must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

Reasons for our decision

We note that the Final Modification Report states that DNOs expressed concern that they may fail to meet some of their licence obligations or incentives should the DCRP be instructed, stressing that a derogation or exemption from such obligations or incentives would be necessary. The Energy Networks Association (ENA) wrote to us on 6 November 2025 seeking clarity on the applicability of relevant licence conditions and guaranteed standards in the event of RLD under ESEC and the DCRP. We responded to this letter on 28 November 2025 setting out that changes to the DNOs Regulatory Instructions and Guidance would be an efficient long term solution to confirm the exemptions on an enduring basis. Such changes were made and have been effective since 17 April 2026¹⁰. We therefore consider this issue resolved.

Our views against the Applicable Code Objectives we consider the modification better facilitates are outlined below.

(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;

We note that this objective relates to the ‘system for the transmission of electricity’, however we consider that a coordinated system extends to all its users, including DNOs who are responsible for their systems connected to the transmission system. Emergency tools to reduce the demand on the system during a supply shortfall are an essential last resort component of system operation.

As set out in the introduction, ESEC demand disconnections are more fairly distributed across the country, better reducing societal impacts, when compared to existing OC6.5

¹⁰ [Notice proposing modifications to the RIGS Year 3 for electricity distribution](#). Publication of final [2026 RIGS update](#) implemented the relief mechanism for RLD events in Guidance Annex G, 2.139-2.141.

tools, however is not suited for implementation on short notice. This modification proposal introduces the DCRP, which closely resembles ESEC and can be implemented within 8 hours of notification of its implementation by NESO. We consider the DCRP therefore better facilitates efficient and coordinated demand disconnections when compared to existing OC6.5 tools. For this reason, we consider this modification proposal better facilitates this Grid Code Objective.

(iii) subject to paragraphs E3.2(b)(i) and E3.2(b)(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;

As set out above, Demand Control is an essential last resort component of system operation. As the DCRP better facilitates efficient Demand Control when compared to other OC6.5 tools, we consider this modification proposal better facilitates this Grid Code Objective.

We note that 4 Fast Load Blocks, which require no network reconfiguration and so can be enacted (disconnected) at no or very short notice, are reserved under the DCRP. This is to ensure that fast acting demand disconnections (of up to 20% of each DNOs network can be implemented during or alongside the DCRP, better ensuring that the system can be secured for a potential emergency event whilst the DCRP is enacted.

We also note that the modification proposal does not address the issue of interaction with Low Frequency Demand Disconnections (LFDD), an existing OC6 tool that automatically disconnects demand at predetermined frequency set-points. Historically areas of DNO networks impacted by LFDD differ from those areas impacted by demand disconnection (OC6.5), thereby avoiding degradation of either product should both be required simultaneously. There is no such differentiation between LFDD and ESEC (or the DCRP). This issue is outside of the scope of this modification proposal and will be

evaluated through a future ESPR workstream. We note that the retention of 4 Fast Load Blocks mentioned above reduce the likelihood of LFDD being triggered alongside the DCRP by ensuring 20% of DNO demand remains available for instructible disconnection prior to the automatic triggering of LFDD.

Finally, we also note that the ESPR highlighted that the mismatch between existing OC6.5 load blocks and ESEC load blocks presented challenges in any potential movement from OC6.5 demand disconnections to ESEC demand rotations. As the DCRP uses the same Load Blocks as ESEC, any transition from the DCRP to ESEC is made much easier. The DCRP is therefore better suited for a short-term supply shortage that transitions into a longer-term event in which ESEC may be enacted.

Overall, we consider that this modification proposal better facilitates this Grid Code Objective.

(iv) to efficiently discharge the obligations imposed upon the licensee by this licence and to comply with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency;

We note that five Panel members considered the modification proposal better facilitates this Grid Code Objective, agreeing with the proposer's view that it allows DNOs to remain compliant with their Grid Code Obligations. We note that this Grid Code Objective relates to the efficient discharge of obligations placed on NESO by the Electricity System Operator Licence, and therefore does not cover DNO compliance. However, we note that the DCRP will be included in the System Defence Plan. The development of a System Defence Plan is a requirement of Commission Regulation (EU) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency

and restoration¹¹. We therefore consider that this modification proposal has a positive impact on this Grid Code Objective.

Decision notice

In accordance with Standard Condition E3 of the Electricity System Operator Licence, the Authority hereby directs that Grid Code modification proposal Grid Code GC0176: *'Introduction of Demand Control Rotation Protocol within Operating Code 6 of the Grid Code'* be made.

Shilen Shah

Head of Strategic Planning, Codes and Standards

Signed on behalf of the Authority and authorised for that purpose

¹¹ [Commission Regulation \(EU\) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency and restoration \(Text with EEA relevance\)](#)