

**SQSS Workgroup Consultation Response Proforma****GSR027: Review of the NETS SQSS Criteria for Frequency Control that drive reserve, response and inertia holding on the GB electricity system**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to [box.sqss@nationalgrideso.com](mailto:box.sqss@nationalgrideso.com) by **5pm on 30 September 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact Paul Mullen [paul.j.mullen@nationalgrideso.com](mailto:paul.j.mullen@nationalgrideso.com) or [box.sqss@nationalgrideso.com](mailto:box.sqss@nationalgrideso.com).

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**For reference the SQSS objectives for GSR027 are:**

- i. facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;*
- ii. ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;*
- iii. facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and*
- iv. facilitate electricity Transmission Licensees to comply with their obligations under EU law.*

**Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.**

### GSR027

Standard Workgroup Consultation questions GSR027		
1	Do you believe that the GSR027 Original solution better facilitates the SQSS Objectives? Please explain your rationale.	No, the SQSS is intended to provide a minimum frequency control standard. However, the proposed change would effectively replace the standard with an external process. It is our view that a minimum frequency control requirement should remain in the SQSS, providing long-term certainty on frequency control parameters in planning and operational time-frames.
2	Do you support the proposed implementation approach?	No, we do not believe that a SQSS change is required to implement the Frequency Risk and Control Report (FRCR). The SQSS should provide a minimum standard while the FRCR process can be implemented via a licence condition, similar to the Network Options Assessment (NOA) process.
3	Do you have any other comments?	Although the ESO has been directed to review the frequency control requirements of the SQSS, the focus has been on creating a framework that is not as burdensome to change as the SQSS. The requirement for a change in the fundamental requirements of the SQSS has not yet been demonstrated, i.e. the various actions required by the E3C and Ofgem reports have not yet been considered in any detail.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Not at this time. However, we would like to propose that the first FRCR is published before changes to the SQSS are considered. This will outline the costs and risks associated with frequency control in detail, as required by the E3C and Ofgem actions, and will highlight if an SQSS change is required.
Specific GSR027 Workgroup Consultation questions		
5	Do you agree with the proposed SQSS legal text?. Please provide the rationale for your response.	No, the legal text removes part of a minimum standard and replaces it with an external process. At this time, only an interim version of the external process has been proposed.
6	Do you agree with the proposed Governance framework? Please provide the rationale for your response.	We agree with the proposed governance framework for the FRCR. The approach is consistent with the NOA process and provides sufficient oversight of the process.

7	The vast majority of the Workgroup believe that the Governance framework should be housed within an annex or appendix to the SQSS. The Workgroup have also considered other options, namely Transmission Licence conditions or the Grid Code. Do you agree with the Workgroup's conclusions? Please provide the rationale for your response.	As noted in our response to question 2 above, the governance framework should be similar to the governance around the NOA process and should therefore be included in suitable ESO licence conditions.
8	The ESO's illustrative FRCR methodology articulates the risks and impacts to be assessed in version 1 of the FRCR. Section 8 sets out what could be considered in future versions. Do you agree with the ESO's conclusions on what will be covered in version 1 and future versions? Please provide the rationale for your response.	The Interim Methodology for FRCR provides a comprehensive overview of the risks and impact that should be considered. We agree that this provides a good template for future FRCRs.
9	Section 10 of the illustrative FRCR Methodology sets out the input data the ESO believe is required to produce the FRCR. Do you agree that this is suitable? Do you have any thoughts on how the data to remove ESO's working assumptions may be gathered?	The FRCR will inevitably be based on incomplete data and various assumptions. The analysis should also include an assessment of the sensitivity of the FRCR results and conclusions to variations in input data and assumed parameters. This should help to prioritise areas where better data are required and justify the collection of such data.
10	The Workgroup have proposed 2 options for which body the 'FRCR Approver' could be. Do	An independent body with appropriate membership, including Ofgem, network companies and wider industry representation, would be better placed to approve the FRCR than the SQSS Panel. Wider

	<p>you agree and which is your preference? Please provide the rationale for your response.</p>	<p>approval could also be sought via a consultation process, although a full consultation may not be required for each FRCR.</p>
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