

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 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 or box.sqss@nationalgrideso.com.

Respondent details	Please enter your details
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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.	Yes. The proposed solution will help establish the appropriate level of reserve, response and inertia holding via a transparent process.
2	Do you support the proposed implementation approach?	Yes. The development of the FRCR Methodology and FRCR both of which would be subject to periodic review seems a reasonable approach given the changing nature of demand and generation.
3	Do you have any other comments?	No.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No.
Specific GSR027 Workgroup Consultation questions		
5	Do you agree with the proposed SQSS legal text?. Please provide the rationale for your response.	<p>Yes, subject to two minor points.</p> <p>i) In the definition of the Frequency Risk and Control Report, the term Frequency Risk and Control Report Methodology is used; this is a defined term and should be in italics.</p> <p>ii) In the definition of Loss of Power Outfeed, there appears to be some words missing: Should 'In the case of <i>offshore</i>, the <i>loss of power outfeed....</i>' read 'In the case of an offshore transmission system, the <i>loss of power outfeed....</i>'?</p>
6	Do you agree with the proposed Governance framework? Please provide the rationale for your response.	Yes. Housing the governance framework in the SQSS is the most appropriate of the options considered as it would result in all the SQSS related requirements being contained in one document, the SQSS. The SQSS is governed by an open governance process, is subject to Authority oversight and is hence an open and transparent process.
7	The vast majority of	See our response to question 6.

	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.	
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 covered in version 1 and future versions? Please provide the rationale for your response.	<p>The FRCR Methodology sets out a new process and it seems reasonable to develop it incrementally. The proposed scope of the first version seems reasonable. In relation to the scope of future versions, we agree that it is important to consider whether events could trigger multiple LFDD stages, as this could help to establish if there are particular customers that should not be supplied via a network in an early LFDD stage.</p> <p>We have made a number of further observations in the attached version of the FRCR Methodology 2020v1, which the author may like to consider.</p>
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?	Given the time available to complete the initial FRCR, using best industry data is a reasonable approach. We agree that there may be need, in the future, to validate some data items that materially affect the FRCR outcomes, and this may require some additional industry data exchange.
10	The Workgroup have proposed 2 options for which body the 'FRCR Approver' could be. Do you agree and which is	The FRCR findings has the potential to materially influence the security of supply risk and the cost of mitigating unacceptable risks, and therefore have significant societal implications. Hence we are of the view that BEIS and Ofgem should jointly be the

	your preference? Please provide the rationale for your response.	Approver.
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