

## FRCR Consultation Response Proforma

### FRCR Consultation

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 Friday 24<sup>th</sup> February 2023**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact [box.sqss@nationalgrideso.com](mailto:box.sqss@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Alastair Fre
<b>Company name:</b>	Drax
<b>Email address:</b>	Alastair.frew@drax.com
<b>Phone number:</b>	07730697290

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

FRCR Assessment and Methodology Consultation questions		
1	Overall, do you agree that the FRCR represents appropriate development in determining the way that the ESO will balance cost and risk in maintaining security of supply while operating the system?	Yes in terms of infeed losses, it is not clear that inertia is not needed for other operational requirements.
2	Do you agree that the FRCR has been prepared appropriately? Please elaborate.	We agree that the process has been followed based on in-feed and export losses, however we are not sure how effects of inertia on power oscillations due to remote faults are being considered.
3	To help structure comments, do you agree with and what is your feedback on the specific	Please use the boxes below for the bullet points

	recommendation in the FRCR?	
4	<b>Recommendation:</b> <b>Minimum inertia policy</b> <i>Reduce minimum inertia policy from 140GVA.s to 120GVA.s</i>	<p>It's not clear to us what reducing the total system inertia will do to the magnitude of the load oscillations which are being seen in generating plants in Scotland due to faults in North Wales. Whilst Scottish generating plants are currently riding through the power oscillations cause by these remote faults, we would like reassurance that reducing the minimum system inertia will not exasperate these oscillations such that plants cannot cope.</p> <p>It would also be helpful if the ESO could explain why these remote faults are having such large effects and what are the maximum levels of power oscillations that plants can expect?</p>
5	Do you have any suggestions for further areas that can be addressed in future editions of the FRCR?	No
6	Do you have any other comments?	No