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| Id | |
| Start time | 3/24/2025 19:35 |
| Completion time | 3/24/2025 20:17 |
| Email | anonymous |
| Name | |
| Respondent full name | Dr John J A Cullen |
| Company name | retired |
| Email address | jjac@btinternet.com |
| Phone number | 1332700670 |
| Which best describes your organisation? | Electrical machines research engineer |
| I wish my response to be: | Non-Confidential - Your responses will be shared with industry, the SQSS Panel and the Authority for further consideration. |
| Do you agree that the FRCR 2025 has been prepared appropriately? Please elaborate... | No comment. |
| Do you believe there has been sufficient industry engagement in preparing FRCR 2025? Please specify further suggestions. | No comment. |
| Overall, do you agree that the FRCR 2025 represents the appropriate level of development in determining the way that the NESO will balance cost and risk in maintaining frequency security while operati | I am strongly opposed to any reduction of the inertia held on the grid for the reasons set out in Kathryn Porter's "Blackout Risk in the GB Grid" report (https://static1.squarespace.com/static/656f411497ae14084ad8d03a/t/679a24b62b650015dd2baba2/1738155194172/Porter-Blackouts.pdf), namely that (i) grid inertia has been falling and frequency excursions have been increasing - see report at Figs. 4 and 5, (ii) as the blackout near-miss of 08/Jan'y/2025 showed there is already insufficient power back-up (i.e. synchronised spinning reserve also provides inertia) and so reduced inertia will make tripping more likely even with a small fault, and (iii) in the light of the Clean Power 2030 plan any reduction of inertia reinforces Porter's comment that "The country is not sleep-walking into a security of supply disaster – under CP2030, it is running headlong into it." So INCREASING INERTIA IS REQUIRED ! |

Do you agree with the recommendation to reduce minimum inertia requirement down to 102 GVA.s?

No!

Do you agree with the recommendation to secure all BMU-only events (including consequential RoCoF)? If not, please explain why.

No comment at this time.

Do you agree with the recommendation to procure additional DC-Low service provision by 200 MW ? If not, please explain why.

No comment at this time.

Do you have any other comments to the recommendations?

Empirical data always trumps modelling in the real world.

In your view, what should the future FRCR focus on?

No comment at this time.

Do you foresee any issues that may arise from moving the obligation to produce the FRCR to a NESO License Condition rather than an Annex to the NETS SQSS?

No comment at this time.

If the obligation to produce the FRCR and the governance rules surrounding that process are moved to NESO's License, do you believe that the NETS SQSS Panel should continue to provide oversight?

No comment at this time.

If your answer to question 16 is "Yes", to what extent should this oversight be? For example, should it include technically assessing the recommendations and approving/rejecting it, or should it be li

No comment at this time.