

## Public

### 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.

You can send responses to [box.FRCR@nationalenergyso.com](mailto:box.FRCR@nationalenergyso.com) or complete the [Online Response Form](#) by 5pm on Monday 31<sup>st</sup> March 2025. (subsequently extended to 7 April).

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.FRCR@nationalenergyso.com](mailto:box.FRCR@nationalenergyso.com)

Section One – Respondent details			
1	Respondent name:	Alan Creighton	
2	Company name:	Northern Powergrid	
3	Email address:	[REDACTED]	
4	Phone number:	[REDACTED]	
5	Which best describes your organisation?	Distribution Network Operator	

6. I wish my response to be:

Non-Confidential (your responses will be shared with industry, the SQSS Panel and the Authority for further consideration)

## Public

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

Section Two – Overall Feedback		
7	<p>Do you agree that the FRCR 2025 has been prepared appropriately?</p> <p>Please elaborate.</p>	<p>Generally, yes. The assurance work undertaken with Accenture has provided reassurance that the documented process has been followed, although it is unclear whether V2 or V3 of the FRCR methodology has been used.</p> <p>However, we are of the view that further work is required to review the methodology and the models used when developing the annual FRCR to ensure that there is a proper assessment of the risks of supplies to customers. We are mindful that the types of generation plant connected to distribution and transmission systems is changing from traditional rotating plant to inverter connected technology and hence the dynamics of the system are changing. We recognise that such systems are complex to model yet the consequences of modelling incorrectly or failing to take proper account of low probability high consequence events could have a material impact on customers.</p> <p>Hence, we recommend that consideration be given to undertaking a fundamental review of the methodology, involving NESO, stakeholders and academia including gathering worldwide operational experience.</p>
8	<p>Do you believe there has been sufficient industry engagement in preparing FRCR 2025?</p> <p>Please specify further suggestions.</p>	<p>Generally, yes. The workshops were welcome and helpful in providing background to the FRCR. The format of the sessions, with questions being provided and responded to online, limited the extent to which they engaged with stakeholders.</p> <p>Perhaps for 2026 consideration could be given to holding a face to face workshop with the opportunity to raise questions. This should facilitate better stakeholder engagement.</p>
9	<p>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 operating the system at a reduced inertia down to 102 GVA.s?</p>	<p>Based on the information provided in the FRCR, probably, but the subject is complex, and we don't have a sufficiently robust understanding of the issues, underlying assumptions, methodology or the models themselves to be able to take an informed view.</p> <p>We have provided detailed comments and observations in the attached marked up version of FRCR 2025, which forms an integral part of our consultation response.</p>

## Public

### Section Three – Feedback on the specific recommendations in FRCR 2025

10	Do you agree with the recommendation to:  Reduce minimum inertia requirement down to 102 GVA.s	See our response to question 9.
11	Do you agree with the recommendation to:  Secure all BMU-only events (including consequential RoCoF)	See our response to question 9.
12	Do you agree with the recommendation to:  Procure additional DC-Low service provision by 200 MW	See our response to question 9.
13	Do you have any other comments to the recommendations?	See our response to question 9.

### Section Four – Feedback on FRCR future work

*NB: Please refer to 8.1 FRCR Forward Looking for context*

14	In your view, what should the future FRCR focus on?	We have provided detailed comments and observations in the attached marked up version of FRCR 2025, which forms an integral part of our consultation response.
----	---	--

## Public

### Section Five – Feedback on FRCR future governance

*NB: Please refer to 8.2 FRCR Future Governance for context*

15	Do you foresee any issues that may arise from moving the obligation to produce the FRCR to a NESO Licence Condition rather than an Annex to the NETS SQSS?	<p>The issues addressed in the FRCR are complex and important; if they are not addressed properly there could be significant implications for GB customers arising from widespread power outages. As mentioned in FRCR 2025 consumers are not really affected by system frequency changes until they fall to 48.8HZ when the LFDD arrangements start to disconnect customer demand.</p> <p>Because of the criticality associated with the FRCR recommendations, it is important that they are subject to a robust review by a group that has sufficient time and expertise to take an informed view.</p> <p>Irrespective of whether the requirement for NESO to produce a FRCR is in the SQSS or the ESO Licence, we are of the view that the analysis should be subject to a robust independent review. This would provide reassurance to Ofgem, as the ultimate decision maker, that the recommendations in the FRCR are appropriate to implement.</p>
16	If the obligation to produce the FRCR and the governance rules surrounding that process are moved to NESO's Licence, do you believe that the NETS SQSS Panel should continue to provide oversight?	<p>The SQSS panel is an informed experienced group and can provide oversight irrespective of the governance arrangements.</p> <p>Some panel members have expressed concern in the past about the level of technical expertise required to make an informed decision. SQSS clause H18 recognises that the panel may need to 'seek appropriate advice and guidance' when developing a recommendation to Ofgem. If the SQSS panel continue to have an obligation to make a recommendation to Ofgem we believe that panel members should engage with independent organisations, and be provided with sufficient funding to undertake that activity.</p>
17	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 limited to confirming that the governance process and methodology has been followed correctly?	<p>Pleased see our responses to questions 15 and 16.</p> <p>Whilst it is important that the agreed methodology is implemented properly, it is also important that the assumptions, methodology and models themselves are sufficiently robust.</p>