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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 or complete the [Online Response Form](#) by **5pm on Monday 31st March 2025**.

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

Section One – Respondent details		
1	Respondent name:	Roddy Wilson
2	Company name:	Scottish Hydro Electric Transmission Ltd.
3	Email address:	[REDACTED]
4	Phone number:	[REDACTED]
5	Which best describes your organisation?	<div> <input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector </div> <div> <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other </div>

6. I wish my response to be:

(Please mark the relevant box)

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

☐ **Confidential** (your responses will be disclosed to the Authority in full but, unless specified, will not be shared with the industry or the SQSS Panel for further consideration)

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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>We believe that the FRCR 2025 has been prepared in accordance the guidelines set out in Appendix H of the NETS SQSS. We welcome the preparation and publication this year of the Data Handbook and the series of Webinars associated with this year's report. We note the data gathered as part of the experience gained operating the system with the previously recommended reduction in minimum system inertia of 120 GVA.s. Whilst this does not appear to have indicated particular concerns, we strongly urge that a similar approach is adopted following a further reduction in minimum system inertia, with continuous monitoring to detect any untoward effects. For example, has the expected positive impact of the ALoMCP in reducing inadvertent tripping been observed in practice.</p> <p>The report indicates that NESO has not detected an obvious connection between minimum system inertia and any previous SSO incidents in Scotland, however, as the characteristics of the system alter the desire to operate a fully decarbonised system must be balanced, at least in the shorter term, with continued secure and reliable operation. Particularly as the System moves further away from well established and long experience based on operating a system with higher minimum inertia. Continued progress towards any further reduction in minimum system inertia must be prosecuted with caution, with periods of pause, if necessary, in order to maintain network security whilst analysing and understanding the new system conditions arising as the industry moves further away from the historical experience base.</p> <p>The introduction this year of a third-party review of the FRCR methodology and the process of governance followed to produce the report has been a positive development and we would support the continuation of this.</p>
8	<p>Do you believe there has been sufficient industry engagement in preparing FRCR 2025?</p> <p>Please specify further suggestions.</p>	<p>Industry engagement has, in our opinion, shown improvement from previous FRCRs. Earlier engagement, through some additional webinars throughout the year could be considered or specific FRCR sessions with in the OTFs</p>

9	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?	Please see comment above
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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	Please see comment above
11	Do you agree with the recommendation to: Secure all BMU-only events (including consequential RoCoF)	Yes. The report sets out justification for this.
12	Do you agree with the recommendation to: Procure additional DC-Low service provision by 200 MW	Yes. The report sets out justification for this.
13	Do you have any other comments to the recommendations?	No

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?	The proposed areas for development set out in Section 8.1 seem appropriate. As TO for the network in the north of Scotland we are very interested in the regional or local inertia aspect and continued consideration of system inertia and its control influence on the wider range of system response to disturbances beyond the response to fundamental frequency. We would also be interested to see any consideration and outcome of AI application to examination of historical technical

		performance and experience of operation with a reduced minimum system inertia policy.
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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?	We believe that that the overarching system frequency criteria should not be removed from the NETS SQSS. The method for achieving and documenting how those criteria are not breached from a techno-economic standpoint is where the NESO and the FRCR take the lead. TO's, however, retain licence obligations in respect of planning and developing the network in accordance and in compliance with the NETS SQSS. And in this regard must continue to have the NETS SQSS criteria to refer to in order to assess the behaviour of the network from a wider system and a connections standpoint and design the network accordingly.
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?	Yes, since the area of interest is one crucial to the continued security of the network and the system; key and fundamental considerations of the NETS SQSS
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?	The extent of oversight needs careful and detailed consideration. We recognise the challenges around detailed technical assessment of the recommendations arising from the increasingly complexity of the various factors, including inputs and assumptions considered within the FRCR. However, some other options lying between a full detailed technical assessment and 'simply' confirmation of adherence to correct governance should be explored.