

Paul Mullen
GSR027 Code Administrator Chair

National Grid ESO

By e-mail:
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Date
30 September 2020

Contact / Extension
Cornel Brozio
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Dear Paul,

GSR027 Workgroup Consultation Response

SP Transmission (SPT) welcomes the opportunity to respond to the GSR027 Workgroup Consultation. The following paragraphs contain an outline of our views and we have also completed the consultation response template, which is attached.

The SQSS provides the minimum standard to which the GB electricity transmission system is planned and operated. Adherence to this standard is a licence condition for TOs and the ESO. We do not believe that replacing part of this standard with an external process is in the interest of Users or consumers. It is our view that a minimum frequency control requirement should remain in the SQSS, providing long-term certainty on frequency control parameters in planning and operational time-frames.

This does not prevent the ESO from continuing to properly balance costs and risks related to frequency response or doing so in a more open and/or consultative manner. In fact, the ESO's licence already requires economic and efficient operation of the system. We therefore welcome a more open and transparent approach to frequency response management via a process like the one outlined in the Interim Methodology for the Frequency Risk and Control Report (FRCR) and the publication of the FRCR.

In our view, the publication of the FRCR should be a licence condition, similar to the requirements for the NOA process and the annual publication of the NOA report, while the SQSS provides a minimum frequency control standard. If necessary, consideration could be given to relaxing the SQSS frequency control standard, if an analysis concludes that this presents a better overall balance of cost and risk. This is not inconsistent with other areas of the SQSS, which allow higher levels of network security or capacity, if it can be economically justified.

Please do not hesitate to get in touch with me if you have any questions in relation to this response.

Yours sincerely



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