

SQSS Workgroup Consultation Response Proforma**GSR027: Review of the NETS SQSS Criteria for Frequency Control that drive reserve, response and inertia holding on the GB electricity system**

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 by **5pm on 30 September 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact Paul Mullen paul.j.mullen@nationalgrideso.com or box.sqss@nationalgrideso.com.

Respondent details	Please enter your details
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For reference the SQSS objectives for GSR027 are:

- i. facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;*
- ii. ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;*
- iii. facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and*
- iv. facilitate electricity Transmission Licensees to comply with their obligations under EU law.*

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

GSR027

Standard Workgroup Consultation questions GSR027		
1	Do you believe that the GSR027 Original solution better facilitates the SQSS Objectives? Please explain your rationale.	We believe that the GSR027 Original solution better facilitates the SQSS Objectives i. & ii. This is because the modification should enable the ESO to hold reserve, response and inertia at costs appropriate to the assessed risks on the system.
2	Do you support the proposed implementation approach?	We support the proposed implementation approach, which will enable the changes to take effect on 1 April 2021, prior to the anticipated low demand periods in Spring and Summer 2021.
3	Do you have any other comments?	The embedded generator Loss of Mains risks are the main driver for the requirement to implement these SQSS changes by 1 April 2021. The assessment and mitigation of these risks form a large part of the FRCR Methodology. With the current progress of the Loss Of Mains change programme, the FRCR process will still lead to the requirement to incur very large (> £400M) costs to mitigate these risks in 2021. We believe that there should be an increased emphasis to implement changes to LoM RoCoF settings by 1 April 2021. In particular, by targeting the approx. 700 sites that would remove the RoCoF risk and the majority of the £400m cost.
	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Specific GSR027 Workgroup Consultation questions		
5	Do you agree with the proposed SQSS legal text?. Please provide the rationale for your response.	We agree that the proposed legal text is appropriate wording to update the list of secured events and to give standing to the FRCR.
6	Do you agree with the proposed Governance framework? Please provide the rationale for your response.	We agree with using the Governance framework approach used in the NOA process in which a methodology is approved separately and is then used for the periodic production of a report.

7	<p>The vast majority of the Workgroup believe that the Governance framework should be housed within an annex or appendix to the SQSS. The Workgroup have also considered other options, namely Transmission Licence conditions or the Grid Code. Do you agree with the Workgroup's conclusions? Please provide the rationale for your response.</p>	<p>We agree that the Governance framework should be housed within an annex to the SQSS, as being the most accessible place for it.</p> <p>This is also based on the ESO advice that that there is no difference in the obligation on the ESO to deliver and comply with the FRCR, whichever of the above options is chosen.</p>
8	<p>The ESO's illustrative FRCR methodology articulates the risks and impacts to be assessed in version 1 of the FRCR. Section 8 sets out what could be considered in future versions. Do you agree with the ESO's conclusions on what will be covered in version 1 and future versions? Please provide the rationale for your response.</p>	<p>We agree with the need for restricting the risks and impacts to be assessed for version 1 so that this becomes a manageable task.</p> <p>We also agree with the ESO's conclusions on what will be covered.</p> <p>However, we believe that stakeholders might expect more detail to be provided in section 5.12 on the exclusion of simultaneous transmission connected BMU losses (c.f. 9 August 2019 event).</p> <p>We agree that other risks should be prioritised for future inclusion in future reports, for example the power quality issue of how smaller frequency deviations impact users, and how often they should be allowed to occur.</p>
9	<p>Section 10 of the illustrative FRCR Methodology sets out the input data the ESO believe is required to produce the FRCR. Do you agree that this is suitable? Do you have any thoughts on how the data to remove ESO's working assumptions may be gathered?</p>	<p>Section 10 does not include the requirement for data on embedded plant with RoCoF LoM protection. Improved data on this plant will allow a more accurate risk assessment to be carried out as well as the appropriate mitigation costs.</p> <p>Expansion of the DCP350 DNO plant register requirements to include protection settings would provide improved input into the ESO working assumptions.</p>
10	<p>The Workgroup have proposed 2 options for which body the 'FRCR Approver' could be. Do</p>	<p>We do not have a preference as both groups would be suitable as the FRCR approver. We believe that there should be governance in place that allows stakeholders to inform the group on the security or</p>

	you agree and which is your preference? Please provide the rationale for your response.	commercial significance of data that has been provided for use in the FRCR.
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