

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
Respondent name:	Andrew Russell
Company name:	ENGIE
Email address:	andrew.russell@engie.com
Phone number:	07980 793647

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.	Yes. With regard to the four objectives above I agree with the proposer's assessment (positive / positive / neutral / neutral)
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	Only those below
4	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.	Yes, I agree with the proposed SQSS legal text.
6	Do you agree with the proposed Governance framework? Please provide the rationale for your response.	Overall, yes apart from Annex 5a Part A / H4, states that only ESO or Ofgem may direct / develop proposals for the FRCR methodology and <i>then</i> interested parties are consulted. Currently, anyone can propose a change to the SQSS (am I correct?) so I feel it would be appropriate if this was maintained and anyone was be able to propose a change and not just ESO / Ofgem in the future. Annex 5b paragraph 14 has wrong reference should say "information set out in paragraph 15". Should there be another governance deliverable here which is a backwards looking report detailing what the ESO has done operationally on a [quarterly?] basis so that industry / Ofgem can check compliance with the FRCR which is in place and that the procedure is working ok?
7	The vast majority of the Workgroup believe that	No strong view so happy to agree with the workgroup's majority decision on this to house it as

	<p>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>an annex to the SQSS. The obligation on the ESO to deliver and comply must be the same regardless of the location.</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>Yes, I agree with the ESO's conclusions on the quick-wins content of version 1. Making the risk of LoM transparent seems key deliverable in version 1. Regarding section 8 it seems fine for future versions. Regarding section 8.3 on smaller deviations, regardless of the impact on users of such small deviations (± 0.2 Hz) which might be proven to be small, it is essential (as described in 4.4.2.1) for the ESO to keep focus on keeping frequency near to 50.0Hz most of the time as whole basis of risk / cost methodology is assuming this is the frequency starting position.</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 seems a suitable list of inputs with the exception of cost data. The ESO will already have some of these to hand but I can't comment on how to procure the others. Think cost data missing here to form part of cost vs risk analysis? Cost data will always be inaccurate as future costs are affected by many factors such as the wholesale gas price and system scarcity. ESO may already have suitable cost data available from other work areas.</p>
10	<p>The Workgroup have proposed 2 options for which body the 'FRCR Approver' could be. Do you agree and which is your preference?</p>	<p>I agree with the two options. Is it likely that a sufficiently knowledgeable independent could be found? The first option might be more practical.</p>

	Please provide the rationale for your response.	
--	---	--