

**FRCR Methodology Consultation Response Proforma****FRCR Methodology 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.

Please send your responses to [box.sqss@nationalgrideso.com](mailto:box.sqss@nationalgrideso.com) by **5pm on Wednesday 13 January 2021**. 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 Robert Wilson [Robert.Wilson2@nationalgrideso.com](mailto:Robert.Wilson2@nationalgrideso.com) or [box.sqss@nationalgrideso.com](mailto:box.sqss@nationalgrideso.com)

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

FRCR Methodology Consultation questions		
1	Overall, do you agree that this methodology will allow the preparation of an appropriate FRCR? (as required by modification GSR027)	<i>Subject to the comments below, we agree that this methodology and the December 2020 Frequency Risk &amp; Control Policy will allow the preparation of a FRCR as required by GSR027.</i>
2	To help structure comments, what is your feedback on the following sections of the methodology?	Please use the boxes below for the bullet points in questions numbered 2a-2j
2a	<ul style="list-style-type: none"> <li>Aim</li> </ul>	<i>There is potentially confusion between section 4.1.4 – Aim, section 8 - reliability vs cost and section 11 Outputs. It is not clear from these sections who will agree the metrics to use in the FRCR and at what stage of the process this is agreed? It is not clear in section 8 and 11 who will set and approve the limits for reliability &amp; cost that then become recommendations in the FRCR and at what stage of the process? (It is assumed to be Ofgem responsible for final approval of the FRCR?).</i>

2b	<ul style="list-style-type: none"> <li>Impacts</li> </ul>	<i>No comments</i>
2c	<ul style="list-style-type: none"> <li>Events and loss risks</li> </ul>	<i>No comments</i>
2d	<ul style="list-style-type: none"> <li>Controls</li> </ul>	<i>The FRCR will be reliant on accurate forecasts of the levels of dynamic containment available for use as controls as inputs to the analysis. The methodology should confirm the source of the input.</i>
2e	<ul style="list-style-type: none"> <li>Metrics for reliability vs. cost</li> </ul>	<i>See response to 2a.</i>
2f	<ul style="list-style-type: none"> <li>Analysis - general approach and assumptions</li> </ul>	<i>No comments</i>
2g	<ul style="list-style-type: none"> <li>Analysis - step-by-step</li> </ul>	<i>No comments</i>
2h	<ul style="list-style-type: none"> <li>Outputs</li> </ul>	<i>See response to 2a.</i>
2i	<ul style="list-style-type: none"> <li>Future considerations</li> </ul>	<i>We agree that other impacts should be prioritised for 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.</i>
2j	<ul style="list-style-type: none"> <li>Input and data sources</li> </ul>	<i>Section 13 does not include the requirement for data on embedded plant with LoM protection. Improved data on this plant will allow a more accurate risk assessment to be carried out as well as the appropriate control costs. Looking forward, expansion of the DCP350 DNO plant register requirements to include protection settings would provide improved input into the FRCR working assumptions.</i>
3	How well will this methodology address its three key aims?	Please use the boxes below for the bullet points in questions numbered 3a-3c
3a	<ul style="list-style-type: none"> <li>establish a clear, objective, transparent process for assessing reliability vs. cost to ensure the best outcome for consumers</li> </ul>	<i>See response to 2a. The assessment process is clear but the process for agreeing metrics and reliability/cost limits is not clear.</i>
3b	<ul style="list-style-type: none"> <li>make the assessment of the risk from the inadvertent</li> </ul>	<i>The assessment will address the aim of making the risk more transparent, but the quality of the assessment will be dependent on the availability</i>

	operation of Loss of Mains protection transparent	<i>accurate input data on embedded plant with LoM protection (see response to 2j)</i>
3c	<ul style="list-style-type: none"> <li>identify quick, short-term improvements for reliability vs. cost</li> </ul>	<p><i>A large part of the FRCR Methodology comprises of assessment and control of the embedded generator Loss of Mains risks.</i></p> <p><i>With the current progress of the Accelerated Loss of Mains change programme, the FRCR process will still lead to the requirement to incur very large costs to control these risks in 2021 and 2022.</i></p> <p><i>We believe that there should be an increased emphasis to implement changes to LoM RoCoF settings by 1 April 2021.</i></p>
4	Do you have any other comments?	No