

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 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 or box.sqss@nationalgrideso.com

Respondent details	Please enter your details
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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)	<p>We welcome the development of this methodology, as it should contribute towards a more transparent and comprehensive framework for the ESO to assess risks associated with frequency deviations and determine an appropriate mix of controls to mitigate them.</p> <p>Providing it is regularly reviewed, and takes account of the changing energy landscape, the FRCR should benefit consumers and market participants.</p> <p>The cost of balancing / system actions taken by the ESO is recovered from generators and suppliers through BSUoS charges, which are ultimately paid by end consumers. The FRCR should ensure that the ESO has a robust process to determine what level of spend is appropriate when mitigating the risk of certain events on the system – this should ensure the optimal outcome for end consumers.</p> <p>The FRCR will assist market participants to understand why certain actions are being taken by the ESO to mitigate the risk and impact of certain events and how service requirements may evolve</p>

		over time. This additional transparency introduced through the FRCR will be welcomed by market participants – especially those competing in the ancillary services and balancing markets.
2	To help structure comments, what is your feedback on the following sections of the methodology?	We do not have any feedback on the specific sections of the methodology.
2a	• Aim	N/A
2b	• Impacts	N/A
2c	• Events and loss risks	N/A
2d	• Controls	N/A
2e	• Metrics for reliability vs. cost	N/A
2f	• Analysis - general approach and assumptions	N/A
2g	• Analysis - step-by-step	N/A
2h	• Outputs	N/A
2i	• Future considerations	N/A
2j	• Input and data sources	N/A
3	How well will this methodology address its three key aims?	<p>The methodology broadly addresses the key aims, however we would like to raise a specific issue which requires further examination by the ESO.</p> <p>It is not clear how onshore transmission line trips will be considered in the FRCR. We would welcome further clarity on this, especially in light of the recent frequency deviation following the trip of the Western HVDC link on 25 October 2020. We believe that risks associated with transmission line trips should be properly taken into account in the methodology and the FRCR report.</p>
3a	• establish a clear, objective, transparent process for assessing reliability vs. cost	N/A

	to ensure the best outcome for consumers	
3b	<ul style="list-style-type: none"> make the assessment of the risk from the inadvertent operation of Loss of Mains protection transparent 	N/A
3c	<ul style="list-style-type: none"> identify quick, short-term improvements for reliability vs. cost 	N/A
4	Do you have any other comments?	<p>The loss of mains protection program is a key initiative to replace or update the protection settings of embedded generation equipment. This work is essential to mitigate the risk of large amounts of embedded generation tripping off the system due to Rate of Change of Frequency (RoCoF).</p> <p>As the energy mix continues to change, system operability challenges associated with RoCoF are likely to increase. It is therefore important that the loss of mains protection program is completed as soon as possible. This should reduce the risk of low frequency events which could lead to demand disconnection and widespread disruption. It should also reduce balancing costs which are incurred daily on frequency containment reserve to secure against embedded generation tripping due to RoCoF.</p>