

FRCR Consultation Response Proforma

FRCR 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 Friday 4th March 2022**. 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
Respondent name:	Alan Creighton
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Please express your views in the right-hand side of the table below, including your rationale.

FRCR Assessment and Methodology Consultation questions		
1	Overall, do you agree that the FRCR represents appropriate development in determining the way that the ESO will balance cost and risk in maintaining security of supply while operating the system?	Overall, probably, but is complex area and whilst it's clear that NGENSO have undertaken significant analysis, particularly in the limited time available, the FRCR only provides a summary of the methodology and findings and it's not particularly clear how the results presented in the FRCR have actually been derived.
2	Do you agree that the FRCR has been prepared appropriately? Please elaborate.	See our response to question 1.
3	To help structure comments, do you agree with and what is your feedback on the specific recommendation in the FRCR?	See below.

4	<p>Recommendation: Simultaneous events <i>Continue with the current ESO FRCR 2021 policy and take no further actions to secure additional simultaneous events.</i></p>	<p>Based on the information in the FRCR report, this is a reasonable recommendation.</p>
5	<p>Do you have any suggestions for further areas that can be addressed in future editions of the FRCR?</p>	<p>Yes. We would like to re-iterate our concerns set out in our response to the 2021 FRCR Methodology consultation, relating to LFDD which are replicated below (in italics). In particular we would like to highlight that it is not just how often a LFDD event may occur and how many customers may be affected, but how long such an event might last.</p> <p><i>This is a complex area and we recognise that this methodology and the subsequent report will be the initial version. Industry understanding of the topic area and the scope of the methodology / report will evolve over time; as the methodology is applied it's inevitable that further issues and concerns will be raised that will need to be addressed in subsequent versions. There may be a need to review the methodology and its application sooner if the findings of the analysis results in recommendations that would materially change NGESOs current operational policy.</i></p> <p><i>In terms of the focus of the methodology, we suggest there should more emphasis on assessing the implications for customers affected by an event. For example an L3, (LFDD) event, depending on the severity of the frequency deviation can have a range of implications for customers. For example:</i></p> <ul style="list-style-type: none"> <i>• If the frequency only falls to a level very slightly under the 48.8Hz LFDD threshold (i.e. within the operating tolerance of the LFDD relays) such that only a small proportion the relays operate, the event would affect a proportion of the of the 5% of demand (approximately 1 million customers) associated with LFDD Stage 1 for a short period of time.</i> <i>• If the frequency falls to significantly less</i>

		<p><i>than the 48.8Hz LFDD threshold such that full Stage I LFDD or multiple LFDD stages operate, then the event would affect millions of customers probably for an extended period of time.</i></p> <p><i>The greater the number of customers affected and the longer the interruption time, the greater the societal, political and media interest and the societal tolerance threshold will be lower.</i></p> <p><i>Furthermore, the societal tolerability of such an event will depend on whether subsequent events affect the same group of customers. For example a 1 in 2 year LFDD event affecting 100,000 customers may be acceptable provided that any given group of 100,000 customers was only affected every tenth event (as they would see this as a 1 in 20 year event).</i></p>
6	Do you have any other comments?	Please see the comments embedded in a copy of the consultation document, which primarily relate to clarity of the methodology, findings and the presentation of risk levels.