

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:	Priyanka Mohapatra
Company name:	ScottishPower Renewables
Email address:	pmohapatra@scottishpower.com
Phone number:	+44 7552250439

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?	<p>SPR agree with the overall strategy of assessment.</p> <p>However, we do recommend NG ESO do consider the scenario of BMU+VS in its planning for application of individual loss of risk controls.</p> <p>As, its risk estimation strategy based on historical events in last 30 years do not reflect the current state of power system with significantly decreased volumes of inertia.</p>
2	Do you agree that the FRCR has been prepared appropriately? Please elaborate.	<p>Yes, SPR agree the FRCR has been prepared appropriately, however we do not agree with all the conclusions.</p>
3	To help structure comments, do you agree with and what is your feedback on the specific recommendation in the FRCR?	<ul style="list-style-type: none"> Do not apply individual loss risk controls to BMU+VS events. SPR challenges this position as we disagree with NG ESO's position that it is one in 30 year event. We believe it will be justified to allow for GBP 57 million investment for BMU+VS outage events.

4	Recommendation: Simultaneous events <i>Continue with the current ESO FRCR 2021 policy and take no further actions to secure additional simultaneous events.</i>	<ul style="list-style-type: none">• NG ESO's position on simultaneous events should be reviewed on a regular basis.
5	Do you have any suggestions for further areas that can be addressed in future editions of the FRCR?	None
6	Do you have any other comments?	None