

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:	Raoul Thulin
Company name:	RWE Supply & Trading
Email address:	
Phone number:	

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?	Thank you for the opportunity to comment on the Frequency Risk and Control Report consultation. The consultation document refers to a response proforma, but I didn't see a link to a proforma in the document. In any case, our comments are very general in relation to the approach taken. The consultation document refers to the high cost of securing against the 'remaining 26% of simultaneous events' and finds that the cost of doing so does not provide good value. It is to be expected that to secure against all simultaneous events would be very expensive and unlikely to provide value for money. However, the question the consultation document does not appear to answer is whether there is an optimum level of events that could be secured while still providing value for money. We would therefore suggest that this may be an alternative approach to assessing the level of balancing services to procure.
2	Do you agree that the FRCR has been prepared appropriately? Please elaborate.	

3	To help structure comments, do you agree with and what is your feedback on the specific recommendation in the FRCR?	
4	Recommendation: Simultaneous events <i>Continue with the current ESO FRCR 2021 policy and take no further actions to secure additional simultaneous events.</i>	
5	Do you have any suggestions for further areas that can be addressed in future editions of the FRCR?	
6	Do you have any other comments?	