

SQSS Workgroup Consultation Response Proforma**GSR027: Review of the NETS SQSS Criteria for Frequency Control that drive reserve, response and inertia holding on the GB electricity system**

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 30 September 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact Paul Mullen paul.j.mullen@nationalgrideso.com or box.sqss@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Grace March
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For reference the SQSS objectives for GSR027 are:

- i. facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;*
- ii. ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;*
- iii. facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and*
- iv. facilitate electricity Transmission Licensees to comply with their obligations under EU law.*

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

GSR027

Standard Workgroup Consultation questions GSR027		
1	Do you believe that the GSR027 Original solution better facilitates the SQSS Objectives? Please explain your rationale.	Yes, as it is positive against objective i) and ii)
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Specific GSR027 Workgroup Consultation questions		
5	Do you agree with the proposed SQSS legal text?. Please provide the rationale for your response.	Yes, it makes clear the relationship between the FRCR and the standards in the SQSS.
6	Do you agree with the proposed Governance framework? Please provide the rationale for your response.	Yes, however the wording of H16/paragraph 17 seems to answer the question of who should be the FRCR Approver "National Grid ESO must provide to the Authority its reasons for any omission of information from the FRCR report as published" as it makes little sense for the ESO to provide those reasons if Ofgem is not involved in the final decision-making. See answer to question 10.
7	The vast majority of the Workgroup believe that the Governance framework should be housed within an annex or appendix to the SQSS. The Workgroup have also considered other options, namely	Since the result of the FRCR will affect the SQSS, leaving it outside of the SQSS seems inappropriate. I understand the similarities between this and the NOA process, but the NOA process does not directly affect any individual code and is not well understood by wider industry, so should not be used as an example of best practice. I therefore agree with the Workgroup's preference.

	Transmission Licence conditions or the Grid Code. Do you agree with the Workgroup's conclusions? Please provide the rationale for your response.	
8	The ESO's illustrative FRCR methodology articulates the risks and impacts to be assessed in version 1 of the FRCR. Section 8 sets out what could be considered in future versions. Do you agree with the ESO's conclusions on what will be covered in version 1 and future versions? Please provide the rationale for your response.	<p>I agree with Section 8, it seems a suitable compromise between those considerations that are necessary immediately and those that will need to be considered at some point.</p> <p>It should be made clear that this list is not exclusive, as unforeseen changes to the system may mean new issues that are not currently listed need to be prioritised. As the system and the FRCR develops, issues will be removed from this list and new ones added.</p> <p>I would also prefer some discussion around when these changes are to be considered. Some issues can be clearly linked to a situation (such as Pathfinders) but others have no obvious trigger for inclusion until they happen, such as multiple stages of LFDD. Whilst I would not expect any timing commitment from the ESO in the FRCR to be binding, it would be helpful if there were approximate timings e.g. Further investigations of frequency deviations closer to 50 Hz: to be included by 2025</p>
9	Section 10 of the illustrative FRCR Methodology sets out the input data the ESO believe is required to produce the FRCR. Do you agree that this is suitable? Do you have any thoughts on how the data to remove ESO's working assumptions may be gathered?	I agree with the data that is required. There will always need to be some working assumptions. As long as the ESO is clear on what those assumptions are and how they were decided, this is a small issue.
10	The Workgroup have proposed 2 options for which body the 'FRCR Approver' could be. Do you agree and which is your preference? Please provide the	<p>The SQSS Panel, Ofgem and BEIS have the appropriate experience to fulfil this role and an appointed independent industry body would be likely to listen to their opinions anyway. Agreement between the SQSS Panel, Ofgem and BEIS is therefore my preferred option.</p> <p>However, the current wording of the Governance Framework does not guarantee that all parties</p>

	rationale for your response.	involved will have the same information. As currently drafted, the ESO is only obliged to explain omissions from the published FRCR to Ofgem, not the Panel or BEIS. In practice, it is almost certain that omissions would be justified to the FRCR Approver, in order to allow them to make the decision, but this could be clarified in the text of H16/paragraph 17. For example: "National Grid ESO must provide to the Authority <i>and the FRCR Approver</i> its reasons for any omission of information from the FRCR report as published"
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