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Dear Ofgem team,

We welcome the opportunity to respond to Ofgem's consultation on the Frequency Risk and Control Report 2025. Citizens Advice is responding as the statutory consumer advocate for energy consumers in Great Britain. This response is not confidential.

Q1: What is your view on NESO's FRCR 2025 policy to reduce the minimum system inertia requirement?

We are supportive of the proposal to reduce the minimum system inertia requirement. The proposed reduction to 102 GVA.s is a logical continuation of a successful policy that has already delivered significant savings for consumers. We are further assured that modelling shows that changing the minimum inertia requirement will not reduce system security. Reducing costs without compromising system security is in the interests of consumers.

We believe, more generally, that it is important that NESO continues to explore opportunities like this. This aligns with NESO's primary statutory duties to promote the efficient and economical transmission and distribution of electricity and gas whilst also ensuring security of energy supply for consumers. To deliver against NESO's other primary statutory duty, to help government meet the net zero target, this requires maintaining public confidence in the regulatory framework that underpins the energy transition. This is helped by being able to demonstrate how opportunities to provide value for money for consumers are being actively looked for and implemented.

Yours sincerely,

Andy Manning,

Head of Energy System Transformation