

Email to Calum Watkins: [engineers@ofgem.gov.uk](mailto:engineers@ofgem.gov.uk)

5<sup>th</sup> September 2025

Dear Calum,

**Response to Ofgem's 2025 NESO Frequency Risk and Control Report (FRCR) consultation.**

EDF is the UK's largest producer of low carbon electricity. EDF operates low carbon nuclear power stations and is building the first of a new generation of nuclear plants. EDF also has a large and growing portfolio of renewables, including onshore and offshore wind and solar generation, as well as energy storage. With over five and a half million electricity and gas customer accounts, including residential and business users, EDF aims to help Britain achieve net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

We welcome the opportunity to respond to this consultation. Our response is set out to the consultation questions below.

- 1) What is your view on NESO's FRCR 2025 policy to reduce the minimum system inertia requirement? Please explain your reasoning, with relevant evidence to support your views.

We have concerns over further reducing the minimum inertia requirement at this time.

Resilience of the electricity system is critical to society and will become increasingly important with the growing electrification of heat, transport, and decarbonising industry. Given the changing nature of the electricity system, both in terms of generation sources but also the nature and technology of the network under development, we consider that NESO and Ofgem need to take a cautious and defensive approach to system operation and resilience. Decisions must be taken in this changing context and increased uncertainty.

NESO's system incident reports are currently the only source of information on the number and impact of generation trips. We have reviewed incidents from 2024 to the latest full set available and note a significant number of high-impact trips, particularly in relation to interconnectors.

The largest recent impact on system frequency (at time of writing) occurred in June 2025, where only a ~670MW loss led to a RoCoF of -0.357 Hz/s, taking the system beyond operational limits and close to statutory limits. This was against an inertia background of 146 GVAs, well in excess of the proposed minimum. NESO have not provided any detail to date on why this event was so impactful.

We also note the multiple unit trip on 14th March 2025, which was the largest near-simultaneous trip event (totalling 1.88GW) since the power outage in August 2019. Though that event was contained within the FRCR policy limits, such events do happen beyond expectations and their occurrences may increase over time. We have spoken to NESO on how they will prepare for such eventualities if the minimum inertia requirement is lowered. Whilst we were happy with NESO's engagement with us after its FRCR 2025 consultation, we encourage Ofgem to consider whether they are fully satisfied with NESO's planned mitigations, given concerns that a lower minimum inertia requirement may impact system resilience.

We also note NESO's estimated saving of £96m for lowering inertia to 102 GVAs, which is not a trivial saving. Resilience is crucial to support the UK economy. Any wider system issue that leads to country-wide or regional blackouts will incur an economic loss far greater than any stated saving of lower minimum inertia levels. This spend could alternatively be framed as an insurance type product rather than a wasted cost. Given this we would urge NESO and Ofgem to continue to identify near term consumer savings but not rush to reduce the minimum inertia requirements.

2) Do you have any further comments?

In support of our response, we have been exploring the available datasets to understand the scale of NESO inertia interventions. Our analysis using NESO's system inertia dataset has shown that NESO are increasing its actions in the market during more settlement periods to maintain inertia at minimum levels. This is reflective of wider changes to the electricity system as more renewable generation comes online, with both figures expected to increase as the system evolves.

How NESO procures additional stability will become important, and particularly in the context of a drive to reduce dependency on carbon-intensive sources such as CCGTs. We note significant delays to NESO's programme to introduce new requirements for grid-forming inverters. Notwithstanding this, we believe that the increasing capacity of Battery Energy Storage System (BESS) due to connect by 2030 will make managing the system easier and make it substantially more cost-effective to procure inertia and other stability products.

We would also like to draw Ofgem's attention to the recently proposed Grid Code modification GC0181 which is exploring amendments to system incident reporting. We would welcome a view from Ofgem on the proposal, including areas where Ofgem would find more enhanced reporting useful for its own monitoring activities. We intend to push for more detailed and frequent reporting of events, including in relation to newer phenomena such as sub-synchronous oscillations.

We look forward to continuing to work with Ofgem in the post-consultation stages. Should you wish to discuss any of the issues raised in our response or have any queries, please contact me or Mathew Chandy at [mathew.chandy@edfenergy.com](mailto:mathew.chandy@edfenergy.com).

Yours sincerely,



Mark Cox  
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