

Dear Ofgem,

I am responding on behalf of Joulen to your consultation on NESO's FRCR 2025 recommendation to reduce the minimum system inertia limit.

**Question 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 support NESO's proposal. The cost-benefit analysis presented by NESO seems robust and sensible and strikes a better balance between the high cost of maintaining high levels of inertia and the cost of procuring additional fast-acting response when required. The impulse to move the responsibility/opportunity to maintain grid balance away from legacy mechanisms and onto intelligent flexibility providers such as Joulen is to be encouraged.

**Question 2) Do you have any further comments?**

This more effective solution will also likely support the growth of the market for flexibility services. In light of this and the significant savings that are likely to flow from increased consumer-led flexibility, we encourage Ofgem to support NESO's proposals.

Best regards

**Jeremy Yapp**

Markets & Compliance Lead

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The Joulen logo, consisting of the word 'JOULEN' in a bold, black, sans-serif font, is positioned on the left side of a horizontal bar. The bar has a solid black background on the left and transitions into a white background on the right, which is filled with a pattern of small, light blue plus signs.