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Engineering and Technology Directorate
Office of Gas and Electricity Markets
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12th September 2025

Dear Calum,

Frequency Risk and Control Report 2025 Consultation

Please find enclosed a response to Ofgem's consultation on Frequency Risk and Control Report (FRCR) 2025.

We, as the TO responsible for the North of Scotland electricity transmission network, have proposed a robust package of investments to support the delivery of the Clean Power 2030 action plan to address both the scale of renewable connections and the expected growth in electricity demand. Our investment programme includes the delivery of a number of critical assets that provide inertia and voltage control within our T3 business plan. Ofgem and NESO have confirmed need for these investments to support the stability of a clean power system. These CP2030 investments are critical to supporting local inertia and stability and maintaining overall network reliability.

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.

SSEN Transmission submitted a response in March 2025 to the NESOs published FRCR 2025. We recommended a cautious approach to reducing the requirement, with appropriate periods of pause and analysis, to assess whether the desired outcome is occurring and there is no increased network security risk. The NESO should ensure constant monitoring of the network as changes are made to the minimum system inertia requirement.

We noted that the operational experience gained from the previous reduction to 120 GVA-s, which, based on the report, has not highlighted significant concerns. This provides confidence in the modelling and operational approach. However, for the proposed further reduction to 102 GVA-s (and potentially lower in the future), we consider it essential to proceed carefully and consider robust analysis and assurance on the safe operation of the network.

While NESO reports no clear link between minimum inertia levels and previous sub-synchronous oscillation (SSO) incidents in Scotland, the evolving system characteristics and the ambition to operate a fully decarbonised network introduce new uncertainties. As the system moves further away from the historical experience base of higher inertia operation, the priority must remain secure and reliable operation.

We recommend:

- Continuous monitoring following the reduction, to detect any unintended effects
- Validation of expected benefits, such as the positive impact of the Accelerated Loss of Mains Change Programme (ALoMCP) in reducing inadvertent tripping, are being realised in practice
- A phased approach with the option to pause if necessary, allowing time for detailed analysis of emerging behaviours under lower inertia conditions

Finally, we welcome the introduction of a third-party review of the FRCR methodology and governance process this year and strongly support the continuation of such independent assurance in future cycles.

Question 2) Do you have any further comments?

Apart from minimum system inertia, we would like to highlight an adjacent stability consideration: occasional very low-frequency oscillations observed in our area, which appear in both frequency and voltage. A practical operational mitigation is to maintain rotating plant, particularly synchronous condensers, to provide system damping.

While currently outside the FRCR remit, this issue is relevant to overall system security and should be considered for inclusion in future iterations. We suggest that future iterations acknowledge and, where appropriate, incorporate assessment of such phenomena to support a more holistic and transparent approach to system stability.

We welcome continued engagement with NESO and the SQSS Panel and further discussion on a broader stability framework.

Yours sincerely,

Roddy Wilson

Network Planning Policy Manager