

Hi

Specifically in relation to FRCR/SQSS I would like to highlight

1. The section of the [Grid Code Development Forum \(GCDF\) - 3 September 2025 | National Energy System Operator](#) meeting which was a discussion on importance of resilience of communication and the limitations of NESOs use of control telephony as a backup for EDT/EDL outages. I hope the meeting summary and recording will be available soon. It raised all sorts of important issue. Based on the stakeholder input I hope that NESO will reconsider this topic and identify what if any changes are necessary to address the concerns raised which impact frequency risks.
2. Similar to the DRAX issue mentioned below another example of NESO missing an opportunity to highlight risks to system security in the [OTF Presentation Q&A](#)

Q: (06/08/2025) Could you please provide information regarding the system frequency deviation yesterday (5th August 2025) around 14:03hrs. Thank you.

A: The short frequency deviation on 5 August 2025 at approximately 15:03 British Summer Time (14:03 UTC) was caused by a number of wind units unexpectedly ceasing generation. This was due to a technical error at the wind farm operator. The error was corrected through dialog between NESO and the wind farm operator.

The loss of multiple units at the same time is not a secured event under SQSS. On this occasion the scale of the loss of infeed did not impact supply to consumers, but in the future it could do so. This type of error by generator operator impacting multiple BMU is an unsecured threat to system security. I would have thought that NESO would have taken the opportunity to highlight to the OTF why it is so important that this type of event does not occur again in the future. I believe SQSS and FRCR should place increasing focus on the risks associated with increasingly complex control and communication systems.

3. GC0181: Modification process & timetable Proposal Form Enhance the Effectiveness of System Incidents Reporting

This grid code [modification](#) highlights that users are concerned by the data provided by NESO regarding frequency and RoCoF. The current national frequency data at 1 second update rate is not sufficient for users to assess the effectiveness of NESO policy regarding inertia. I believe data should be made available at multiple points across the GB transmission system, at a much higher update rate. Ideally this should be both PMU phasor data and fault recorder voltage waveform data for any major events. Time allowing, I will contribute to the GC0181 discussions.

4. Electric time

The FRCR makes no mention of electric time and the SQSS obligations to keep this within +/- 10s. NESO currently publish no data related to compliance and initially refused my data request citing security concerns. Could NESO consider adding Electric Time to their reporting metrics and mentioning it in future versions of FRCR.

I would welcome any feedback you can provide on these points.

For information if time allowing I plan to cover some of these issues in a formal response to question 2 of [Frequency Risk and Control Report 2025 | Ofgem](#) however I do not have time I hope OFGEM will accept this email informal input to the FRCR consultation process.

Regards

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