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OFGEM C/O Calum Watkins

**Re: FRCR Consultation**

Thank you for the opportunity to respond to the consultation on the Frequency Risk and Control Report (FRCR). We previously provided feedback to NESO during their consultation process and are generally supportive of the document and its overall approach. Our observations on the 2025 FRCR assessment and NESO responses can be found in the NESO website [Frequency Risk and Control Report \(FRCR\) | National Energy System Operator](#).

Notwithstanding that response and our subsequent discussions with NESO on these, we note several outstanding areas where we believe further consideration is needed in future iterations of the FRCR:

1. Independent review of technical assumptions
2. Regional variation in Rate of Change of Frequency (RoCoF)
3. Sensitivity analysis of risk/reward calculations
4. Implementation of a frequency containment “safety net”

Regarding point 1, we understand that an independent technical review on the content of the assessment was not feasible this year but is planned in future years, which we welcome.

On point 2, we have engaged with NESO to explore differences in RoCoF performance when sampled locally versus using national averages. This regional perspective is important for accurately assessing system stability. NESO noted the importance of regional tests and has initiated discussion with us on next steps.

For point 3, we raised concerns about the robustness of the risk/reward methodology. This included examining sensitivities of assumptions and their effect upon the standard deviations of risk outcome. NESO acknowledged these concerns and indicated that the methodology will be reviewed in future reports.

On point 4, we discussed with NESO the potential for Low Frequency Sensitivity Mode – Underfrequency (LFSM-U) to be deployed across assets such as batteries and interconnectors. This would provide an additional layer of frequency containment ahead of Low Frequency Demand Disconnection for exceptional events at a lower inertia level. NESO notes these opportunities being available within existing available headroom of normal operation, and we understand is exploring this topic is being explored further by them.

We also noted that the implementation period for the proposed reduction in inertia is very short. We recommend that NESO and Ofgem establish clear expectations for what constitutes successful validation during this period. Given the seasonal nature of the risks involved, it may be necessary to repeat assessments across different seasonal conditions.

Finally, while the current FRCR focuses on the year ahead, it offers limited forward guidance on managing inertia levels through to 2030. We believe that a clearer roadmap outlining expected innovations and improvements in inertia estimation tools would help provide a more structured framework for industry planning and market development. This would allow the annual review to serve as a progress check rather than a full reassessment each year.

Yours sincerely,

**Ben Gomersall-**

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