

Firm Frequency Response (FFR)

Article 18 Consultation | 28 September 2022

Currently, there are two different services that we buy through our Firm Frequency Response (FFR) monthly tenders: Dynamic FFR and Static FFR.

Static FFR

This product activates automatically on a relay following a frequency deviation below 49.7Hz. We currently aim to procure around 250MW of Static FFR.

We can see value in continuing to procure Static FFR to support post fault frequency recovery to within statutory limits (49.5Hz) within 60 seconds from an excursion.

We intend to continue to procure Static FFR for the foreseeable future. We see it as a cost-efficient option to support post fault frequency recovery to meet our frequency obligations.

Therefore, we are making minimal changes to the service to be able to procure it in a manner compliant with the Clean Energy Package (CEP).

We are consulting on these changes now as part of the Response Reform Release 1 annual cycle and will confirm a launch date for daily procurement in due course. As an indicator, implementation of these changes, subject to Ofgem approval, ESO and industry readiness, may follow a similar timeline to the new response services, i.e. April 2023, in line with when our existing derogation against elements of the CEP ends. In case a launch date for daily procurement cannot be realised for the start of April, in order to achieve business continuity, we intend to initiate a request to extend the existing derogation. This request, subject to Ofgem approval, will seek to enable us to continue to procure static FFR on existing terms from the start of April 2023.

Article 18 Consultation

We are consulting on new Service Terms and Procurement Rules for the daily procurement of Static FFR. These have been aligned to the new contracts format for DC/DM/DR. We have included a table of origination within the consultation documents which shows where clauses have originated from within the old FFR Standard Contract Terms.

Key Changes

- Daily procurement of Static FFR
- Pay as clear payment mechanism
- Requirement to submit independent bids for each EFA block
- Automatic formation of contracts following publication of results onto the ESO website
- Prequalification and testing managed via the Single Markets Platform

Dynamic FFR

This service delivers automatically proportional to frequency deviation. We currently procure around 300 - 350MW of Dynamic FFR.

We intend to replace Dynamic FFR with our new frequency response products Dynamic Moderation (DM) and Dynamic Regulation (DR). To phase out Dynamic FFR and move all of our relevant requirement to the new products we need to grow the markets for DM and DR. This will require some time for the markets to mature and some ESO system and process changes to correctly reflect the new products in our real time response holdings.

To enable a smooth transition, we will request a derogation against CEP 6(9)¹ to procure Dynamic FFR beyond March 2023.

These contractual changes, subject to approval from Ofgem, are expected to come into force on 1st April 2023.

Article 18 Consultation

We are consulting on amendments to the existing FFR Standard Contract Terms to remove reference to the Static FFR service. The current FFR service terms will continue in place to facilitate the procurement of dynamic Firm Frequency Response under those terms and we will not be consulting on changes to the dynamic FFR service.

Key Changes

- Removal of references to Static FFR / non-dynamic FFR / Automatic Response.

The consultation closes on 28th October 2022. Please respond using the consultation pro forma which is part of this suite of consultation documents.

¹ [The Clean Energy Package](#)