



Consultation Response

SENT BY EMAIL TO: lucy.hudson@uk.ngrid.com

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Lucy Hudson
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Dear Lucy,

ELEXON's response to Grid Code Modification Proposal C/11

This is ELEXON's response to the NGET consultation on Grid Code Modification Proposal C/11 ('BM Unit Data from Intermittent Generation') published on 18 May 2011.

We are supportive of the Working Group's proposals, but have two comments on the detail of the legal text in Annex 2.

Obligations Arising from Unavoidable Events

The drafting in Annex 2 adds "unpredictable changes in the level of the Intermittent Power Source" to the list of unavoidable events in BC2.5.1. This drafting change has two consequences, only one of which was intended by the Working Group:

- It allows the Generator to deviate from their Physical Notification (as intended by the Working Group, and described in paragraph 3.6 of the consultation).
- It also creates an obligation on the Generator to re-declare their Maximum Export Limit (MEL), as BC2.5.1 goes on to say that any anticipated variation from FPN must be notified to NGET without delay, through submission of revisions to the Export and Import Limits. This was not the intention of the Working Group, who recommended no changes to obligations relating to submission of MEL until another Working Group has considered the issues (see paragraph 4.1.4.7 of the Working Group report).



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We therefore suggest that a further change to the BC2.5.1 drafting is required to deliver the intent of the Working Group:

Any anticipated variation in input or output from the **Physical Notification** in respect of that **BM Unit** (or a **Generating Unit**) prevailing at **Gate Closure** (except for variations arising from the issue of **Bid-Offer Acceptances** or instructions by **NGET** as outlined above **or from unpredictable changes in the level of the Intermittent Power Source**) for any **BM Unit** (or a **Generating Unit**) post **Gate Closure** must be notified to **NGET** without delay by the relevant **BM Participant** (or the relevant person on its behalf). Implementation of this notification should normally be achieved by the submission of revisions to the **Export and Import Limits** in accordance with BC2.5.3 below.

Terminology

The consultation document uses the term 'Output Useable' throughout, which is not the accepted English spelling, and is inconsistent with the current drafting of the Grid Code and BSC (both of which refer to 'Output Usable'). We assume it is not your intention to change the defined term. Any change would require a housekeeping Modification to the BSC for consistency, which seems unnecessary work.

Further Information

Please do not hesitate to contact me, or my colleague Kathryn Coffin, if you wish to discuss any aspect of this response. I can be contacted on 020 7380 4345 or john.lucas@elexon.co.uk and Kathryn can be contacted on 020 7380 4030 or kathryn.coffin@elexon.co.uk.

Yours sincerely

John Lucas
ELEXON Design Authority