



FAO Lucy Hudson
Electricity Codes
Regulatory Frameworks
National Grid Electricity Transmission plc
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

16th June 2011

Dear Lucy,

C/11 BM Unit Data from Intermittent Generation

Drax Power Limited (Drax) is the operating subsidiary of Drax Group plc and the owner and operator of Drax Power Station in North Yorkshire. We welcome this opportunity to provide feedback on National Grid's proposal to modify the Grid Code with regards to BM Unit data provided by intermittent generators.

Output Useable Data

Drax is supportive of the proposal to clarify the definition of Output Useable data to mean a level that would enable a given plant to generate at Registered Capacity. This appears to be a sensible approach to ensure National Grid receives the data it requires to model a complete set of scenarios, i.e. from maximum to minimum delivery of generation from all plant.

Physical Notifications (PNs)

Drax supports the Workgroup's view that there should be no change to the definition of PNs with regards to setting accuracy criteria. The outcome of National Grid's analysis, as described in the consultation document, demonstrates that the use of persistence forecasting enables wind powered generators to achieve a relatively similar level of PN accuracy to that achieved by non-intermittent generators. On that basis, it does not seem logical to lower the current standard for PN accuracy when there is no evidence to support such a move.

Maximum Export Limit (MEL)

It is reasonable to expect that the System Operator may encounter difficulties in determining the total headroom *available* if MEL were to no longer provide a strong signal on total *available* generation capacity. Whether there is a justification for change now will depend upon the scale of the issue with the present level of intermittent generation (i.e. a cost benefit exercise is required), although it is clear to see the potential for the issue to worsen over the next decade as the volume of connected intermittent capacity increases.

Drax agrees with the Workgroup that further consideration should be given to how intermittent generators better signal *available* headroom via MEL data. However, until the associated costs and benefits of such changes have been assessed, the current Grid Code provisions for updating MEL data should remain unchanged.

NGET's Role in Wind Forecasting

There is a clear need for National Grid to develop wind forecasting tools that will better inform their operational decisions. However, it would not be appropriate for National Grid to use such data to submit PNs on behalf of system users.

As discussed by the Workgroup, plant operators are in the best position to decide whether a plant / unit should generate, based upon availability, market conditions and other plant specific considerations. National Grid should concentrate their resources on the efficient and economic operation of the transmission system as a whole, rather than the submission of PN data for individual generation assets.

Changes to Gate Closure

Drax agrees that, at this time, there appears to be no clear justification for moving to a shorter Gate Closure, particularly for the purposes of improving the accuracy of PN submissions from intermittent generators.

However, it may be sensible for National Grid (and Elexon) to periodically review their analysis to ensure the conclusions remain valid as the volume of wind capacity increases and wind forecasting capabilities are further developed. Any potential future move to a shorter Gate Closure should be economically justified by appropriate cost benefit analysis.

Obligation to Follow the PN

Drax does not agree with the conclusions of the Workgroup with regards to modifying the obligation to follow submitted PNs. It would appear logical to class a decrease in output as an unavoidable event for intermittent generators, thereby not a breach of the Grid Code, where (a) wind speed decreases resulting in reduced output, or (b) an increase in wind speed requires the turbine to be shut down for safety reasons, which also results in reduced output. These issues match those faced by other types of generator, e.g. issues surrounding fuel delivery and circumstances where generating would be considered unsafe. Such situations are adequately covered by the current definition of unavoidable events.

However, the report fails to justify why an increase in wind speed, which results in an increase in generation above PN, should be classed as an unavoidable event. Given the ability wind generators to control the level of output in a situation where fuel availability increases, it does not appear sensible to treat such plant any differently to other types of generator. Put simply, it is the generators choice not to restrict output; therefore, it is not an unavoidable event.

There should be a very clear justification to discriminate between generation technologies; the C/11 consultation document does not provide such justification.

Payments for Bids and Offers

Drax believes that potential changes to the methodology for calculating Bid / Offer payments for wind generators should not be progressed in isolation as a Grid Code work-stream. Such work should be considered by a cross-code work-stream that is able to better consider the potential impacts of such change(s) on each of the industry codes (including potential implications for other payment / charging methodologies). The Grid Code Review Panel should work with other industry code panels to co-ordinate such work in an efficient manner.

If you would like to discuss the views expressed in this response, please feel free to contact me.

Yours sincerely,

By email

Stuart Cotten
Market Development Manager
Regulation and Policy