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Ref GC C/11
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Dear Lucy,

Consultation Document for **C/11: BM Unit Data from Intermittent Generation**

ScottishPower welcomes the opportunity to provide comment on the above consultation. This response is submitted on behalf of ScottishPower's Energy Wholesale Business, which includes ScottishPower Generation Ltd and ScottishPower Energy Management Ltd.

ScottishPower supports the proposed changes to the Grid Code with respect to the requirements for submission of data from intermittent BMU's. In particular, we support the clarification of the definition of Output Usable in B.C.5.3.1 and the extension of the definition of unavoidable event in B.C. 2.5.1 to include changes in the level of the intermittent power source. We are mindful of the need to enable the SO to balance the system in as efficient a manner as possible while maximising the output from renewable generators and without overly penalising those generators whose ability to predict their output may be largely beyond their control as a consequence of the intermittent nature of the power source.

We welcome the future work planned to further develop this area, with the aim of fully catering for the unique operational characteristics of intermittent generation in the Balancing Mechanism.

I trust that you will find these comments helpful. Nonetheless, should you require further clarification of any of the above, please do not hesitate to contact me.

Yours sincerely,

Gary Henderson

For and on behalf of: ScottishPower's Energy Wholesale Business which includes ScottishPower Generation Ltd and ScottishPower Energy Management Ltd.