



CWP Energy

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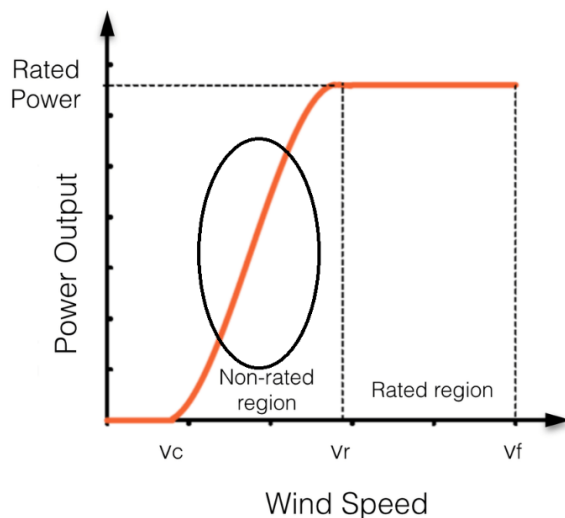
Response: FPN Good Industry Practice Consultation | December 2024

Executive Summary

We have addressed the questions raised (in the consultation) below but present again some of our previous comments/concerns which were submitted under the name of Community Windpower Limited.

The Grid Code ("the Code") accepts that the intermittent power source for onshore wind BM Units makes it more difficult to submit accurate Physical Notifications ("PNs") but all BM Units should use reasonable endeavours and adopt Good Industry Practice to make the PNs as accurate as possible. In applying the essence of the Code, one should consider which inputs used to calculate the PN are 'controllable' and which inputs are 'uncontrollable'. The controllable inputs are plant availability and plant capacity – all of which should be available to the BM Unit. The uncontrollable input is the power source – the wind speed at site, which is derived for the purpose of PNs by forecasting.

Assuming that BM Units will be able to correctly apply the controllable inputs and site specific power curve, the accuracy of the PN will be derived from the wind speed forecast which by its very nature is a 'forecast'. Couple this with the exponential nature of the power curve at lower wind speeds, one might suggest that accuracy is more down to chance than process. This was described in our previous response:



Within the non-rated region, a change in wind speed of 3m/s (from 7m/s to 10m/s for example) will produce an increase in yield of 1,979kW which is 46% of rated power, and could significantly impact forecasted Active Power depending upon how quickly the wind is ramping up or down. Whereas, at the top of the curve, a change in wind speed of 3m/s (from 12m/s to 15 m/s for example) will produce an increase in yield of 172kW which would mean a difference of ~4% of Active Power output.



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We welcome NESO's sharing of best practices and principles that we should all be endeavouring to apply but we state again that accuracy is achievable in certain conditions but not all. As we stated in June 2024, the top 10% of BM Units based on accuracy of PNs fluctuates each month, illustrating that accuracy is achievable but not sustainable. Stable wind conditions would mean wind forecasts may well produce an accurate PN but volatile wind conditions, no matter how regular the wind forecast, are unlikely to produce a consistently accurate PN – that is the nature of the power source and generating unit which we are dealing with.

Question 1a: Do you agree that NESO should outline examples of practices for preparing PNs that it may consider in its view of whether Good Industry Practice is being followed by wind units in the BM?

Yes – BM Units should welcome illustrative examples of how to potentially improve PNs, but we do not think that Good Industry Practice should be prescriptive as one size does not fit all. For example, to suggest that all BM Units should operate as though 'energy trading' is not feasible nor realistic. However, suggesting a regular review of the modelling for PNs would be expected to be Good Industry Practice. Equally, as illustrated above, a more regular forecast (e.g. hourly) does not guarantee a more accurate forecast because it very much depends on the prevailing wind conditions at the time; so, to make this mandatory would not seem reasonable.

Question 1b: Do you consider it feasible to apply these principles?

As stated above, some of the suggested principles make sense. However, if these principles are to be considered mandatory and a measure of Good Practice, then we would object and suggest that such a list should be consulted upon more fully, to determine what is deliverable. Likewise, it should be confirmed that increased regularity of submissions can be accommodated by the IT systems deployed by NESO and their internal processes can also abide.

Question 1c: If you think there are alternative practices that NESO could usefully consider in its view of whether Good Industry Practice is being followed, please provide suggestions.

As you state in the consultation document, NESO has arrived at a set of principles by speaking to BM Units whom they consider have demonstrated high levels of PN accuracy. I would suggest a questionnaire to all BM Units to assess what modelling is being used, regularity of forecasting, etc so that a fuller picture is obtained of what is being done and how this might be improved.

Question 2a: Should NESO implement this change in description for extenuating circumstances?

Yes – NESO should adopt this new wording and engage as suggested.

Question 2b: If not, are there alternative changes that could be made which better recognise site specific considerations?

We do not suggest any alternatives.

Question 3: Do you agree that the thresholds used should be set to the standards achieved by Onshore units or should the previously published aggregate values be used?

For the reasons noted above our view is the thresholds for Onshore units should not be used because they only relate to the top 10% and this level of accuracy is not sustainable – this consultation process has demonstrated that the top 10% is not the same 10% each time. Furthermore, the obligation under the Code is to provide a PN with our "best estimate" of output.