

Market Monitoring Team,  
National Grid ESO  
St Catherines Lodge  
Bearwood Road  
Sindlesham  
Nr Wokingham  
Berkshire  
RG41 5BN

16<sup>th</sup> December 2024

Dear Market Monitoring Team,

**FINAL PHYSICAL NOTIFICATION (FPN) GOOD INDUSTRY PRACTICE (GIP)  
CONSULTATION DECEMBER 2024.**

We are pleased to respond to NESO's consultation on FPN Good Industry Practice (GIP). We remain committed to supporting NESO in improving PN forecasting accuracy and considering industry feedback.

We appreciate the additional clarity on NESO's perspective of GIP, as it will help industry participants implement improvements. We welcome the revision to the extenuating circumstance clause and consider reasonable. We are supportive of setting thresholds based on the standard achieved by onshore units as this provides consistency across the industry. Finally, we urge consideration of the GIP review frequency to ensure the guidance keeps pace with industry changes and remains relevant.

We look forward to ongoing discussions with NESO and continuing to provide support throughout the education period via the best practice knowledge share. If there are any further questions or feedback required, we are happy to arrange a follow-up call.

Yours sincerely,



**Richard Sweet**  
Director of Regulatory Policy,  
ScottishPower



**Joe Dunn**  
Head of Grid and Regulation,  
ScottishPower Renewables

**DRAFT GUIDANCE NOTE - GUIDANCE ON GOOD INDUSTRY PRACTICE IN RELATION  
TO FPN ACCURACY – SCOTTISHPOWER RESPONSE**

**Proposal 1 – Examples of Best Practice**

**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, we are supportive of NESO outlining examples of practices for preparing PNs as this helps steer industry in where to start when looking to improve PNs.

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

As above.

**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.

No comment.

**Proposal 2 – Extenuating Circumstances**

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

Yes, the proposed revision is welcome and appears reasonable.

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

We are aligned with NESO's view that there are varied reasons why specific units may not meet the proposed threshold and an exhaustive list is not practical.

**Proposal 3 – Offshore/Onshore Consideration**

**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?

We are supportive of the proposal to use onshore asset performance as a simple, consistent, and transparent standard as part of the wider monitoring process. Opting for the onshore standard allows the industry greater flexibility in meeting the thresholds.

**ScottishPower**  
December 2024