

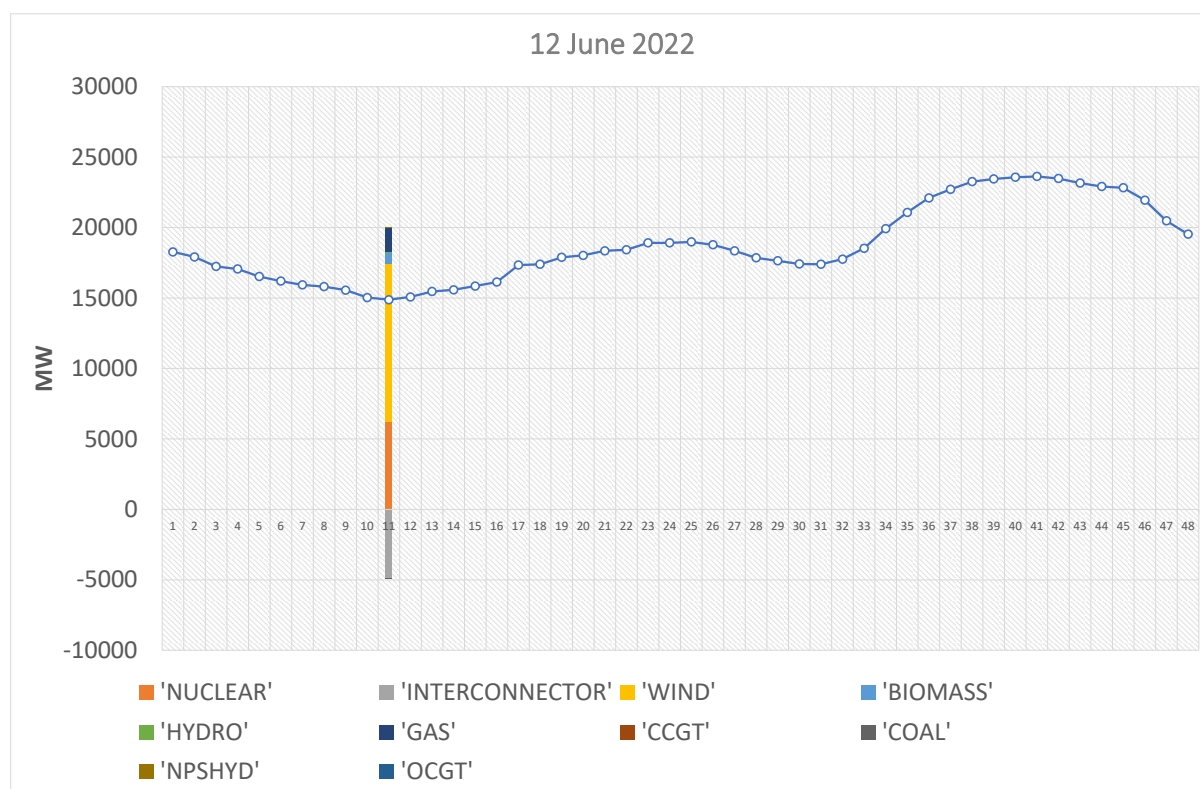
### Controllability case for GC 0117

NGESO believe that controllability with visibility is necessary if GC00117 is implemented. More capacity in the Balancing Mechanism leads to more competition in an efficient market which translates to lower costs for system operation.

The case is more apparent when looking at summer minimum demands where previous analysis focused on peaks.

The 12-June-2022 is our case study to set the scene.

Minimum demand was 15GW, wind was 11GW and continental interconnectors were flowing out of GB. Inflexible generation comprised of nuclear and voltage/inertia plant. Nearly 2.7GW of wind bids were taken at a cost of ~£0.30m for one settlement period. The constraint costs for the day were £15m and the total cost of balancing £20m. The FPNs are taken here with the latest wind forecast prior to real time and the day ahead interconnector position to show a typical control room situation. Overall, an expensive day.



We look at the impact on costs with and without the grid code mod keeping assumptions constant.

Case 1:

A future with 3GW of 'small' new wind

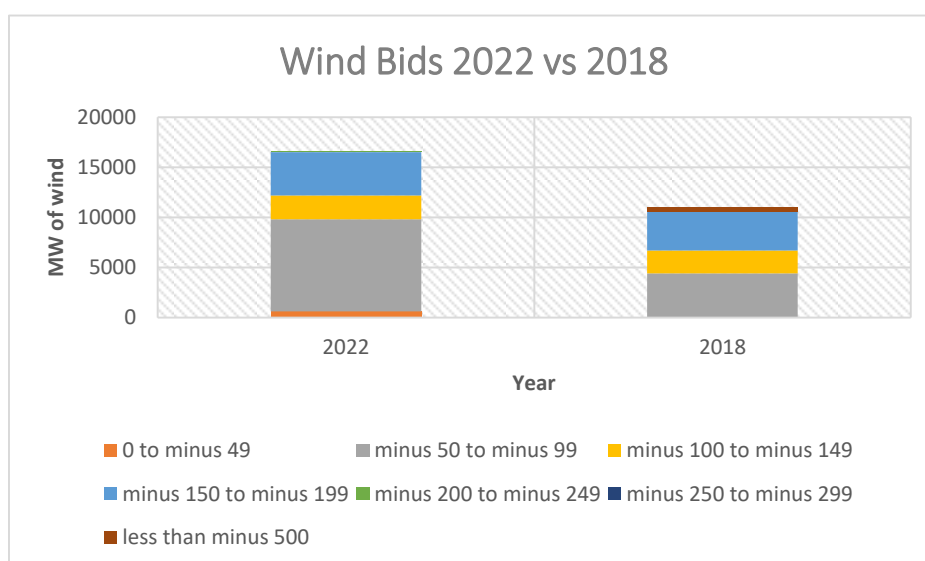
|                                   | Future +3GW |             |
|-----------------------------------|-------------|-------------|
|                                   | No GC       | With GC     |
| <b>Minimum demand (MW)</b>        | 13350       | 15000       |
| <b>Units required (MW)</b>        | 9000        | 9000        |
| <b>Emb Wind capacity (MW)</b>     | 9000        | 6000        |
| <b>BMU Wind capacity (MW)</b>     | 20000       | 23000       |
| <b>Wind load factor</b>           | 0.55        | 0.55        |
| <b>BMU Wind generation (MW)</b>   | 11000       | 12650       |
| <b>Wind Action required (MW)</b>  | <b>6650</b> | <b>6650</b> |
| <b>Proportion of wind BOAd</b>    | 60%         | 53%         |
|                                   |             |             |
| <b>Marginal Wind Price -£/MWh</b> | £ 149       | £ 99        |
| <b>Wind Action cost</b>           | £ 495,425   | £ 329,175   |
| <b>Cost differential</b>          |             | £ 166,250   |

Firstly, without the mod, this generation volume becomes embedded without control. Our minimum demand falls from where it is today to 13.35GW (netting de-rated generation). Our requirements for voltage (2GW), inertia (2GW) and inflexible nuclear power (5GW) are 9GW. Today we have ~6GW of embedded wind with the additional 3GW we reach 9GW. Metered transmission wind is ~20GW. The difference between the demand and the inflexible generation is what needs to be actioned – we focus here on wind - 6.65GW of wind. The important point here is the proportion of BMU wind being actioned. From the price stack below, we have the distribution of metered wind per price bracket from June last year. The marginal price here is between £-100 to £-149/MWh.

The alternative case, with the mod is that the generation is metered, visible and controllable and a part of national demand. The embedded wind stays at the existing level but the BMU wind capacity grows. The amount of wind to be action is the same (6.65GW) but the key difference here is that the proportion of BMU wind is less. This places us at a lower price bracket and therefore lower total cost. In isolation this is £0.17m less. This is potentially £8m per day.

We have modelled 3 other scenarios, with 6GW, 9GW and 12 GW of new wind. The savings using the same approach are £0.4m, £0.25m and £0.6m. One key point to note is that under a 12GW scenario we need more wind than is available in the BM making this an operability issue in addition to an economic issue. However, the 'With GC' mod scenario is operable.

## BM wind available by price bracket £/MWh



The case is further strengthened when looking at the afternoon demand trough. This year we have seen a demand at 14.8GW at 14:30 on 27 May. The impact of solar generation also becomes an important factor. Looking at load factors from the summer so far, we have a max of 0.75 for solar and 0.67 for wind. An average of 0.71 is applied. Wind prices from May 2023 are also refreshed here. The summary is presented in Appendix 2.

The savings are £0.07m, £0.5m, £2.7m, £3.2m for our 4 scenarios however 2 of our 4 scenarios are inoperable. Under such circumstances the control room have emergency instructions which can be sent to wind farm operators. Our analysis is looking nationally however you can get localised issues which can be more challenging. A NRAPM (Negative Reserve Active Power Margin) forecast for Daily 2-14 days ahead and Weekly for 2-52 weeks ahead for both National and Scotland is published on the data portal. The purpose of the NRAPM forecast is to indicate to the market a risk of NRAPM situation and therefore risk of Emergency Instructions.

The insufficient NRAPM warning is a request to encourage more flexible parameters from generators and inform participants of a risk of emergency instructions. A system NRAPM may be issued if there is insufficient flexibility available to ensure that generation matches demand during low demand periods. Controllability can help avoid the use of Emergency Instructions.

One of the features of CFD wind is that during negative price periods no payment is made from LCCC to the generator<sup>1</sup>. When these periods occur, it can coincide with a dramatic withdrawal of wind generation from the system with little coordination. This creates a challenging set of circumstances with the control room balancing competing requirements for energy, ramping, constraints, reserve, and response. The ESO needs controllability to instruct offers on these wind farms to maintain system security. In a system where renewables are a growing share of the fuel mix, controllability to manage this phenomenon is essential.

<sup>1</sup> For AR2,3 negative price period is 6 consecutive hours and AR4 any hour

### Appendix 1 overnight demand minimum

|                            | Current | Future +3GW |           | Future +6GW |           | Future +9GW |           | Future +12GW |           |
|----------------------------|---------|-------------|-----------|-------------|-----------|-------------|-----------|--------------|-----------|
|                            |         | No GC       | With GC   | No GC       | With GC   | No GC       | With GC   | No GC        | With GC   |
| Minimum demand (MW)        | 15000   | 13350       | 15000     | 11700       | 15000     | 10050       | 15000     | 8400         | 15000     |
| Units required (MW)        | 9000    | 9000        | 9000      | 9000        | 9000      | 9000        | 9000      | 9000         | 9000      |
| Emb Wind capacity (MW)     | 6000    | 9000        | 6000      | 12000       | 6000      | 15000       | 6000      | 18000        | 6000      |
| BMU Wind capacity (MW)     | 20000   | 20000       | 23000     | 20000       | 26000     | 20000       | 29000     | 20000        | 32000     |
| Wind load factor           | 0.55    | 0.55        | 0.55      | 0.55        | 0.55      | 0.55        | 0.55      | 0.55         | 0.55      |
| BMU Wind generation (MW)   | 11000   | 11000       | 12650     | 11000       | 14300     | 11000       | 15950     | 11000        | 17600     |
| Wind Action required (MW)  |         | 6650        | 6650      | 8300        | 8300      | 9950        | 9950      | 11600        | 11600     |
| Proportion of wind BOAd    |         | 60%         | 53%       | 75%         | 58%       | 90%         | 62%       | 105%         | 66%       |
| Marginal Wind Price -£/MWh |         | £ 149       | £ 99      | £ 199       | £ 99      | £ 199       | £ 149     | £ 249        | £ 149     |
| Wind Action cost           |         | £ 495,425   | £ 329,175 | £ 825,850   | £ 410,850 | £ 990,025   | £ 741,275 | £ 1,444,200  | £ 864,200 |
| Cost differential          |         |             | £ 166,250 |             | £ 415,000 |             | £ 248,750 |              | £ 580,000 |

### Appendix 2 afternoon demand minimum

|                            | Current | Future +3GW/+1GW |             | Future +6GW/+2GW |             | Future +9GW/+3GW |             | Future +12GW/+4GW |             |
|----------------------------|---------|------------------|-------------|------------------|-------------|------------------|-------------|-------------------|-------------|
|                            |         | No GC            | With GC     | No GC            | With GC     | No GC            | With GC     | No GC             | With GC     |
| Minimum demand (MW)        | 15000   | 12160            | 15000       | 9320             | 15000       | 6480             | 15000       | 3640              | 15000       |
| Units required (MW)        | 9000    | 9000             | 9000        | 9000             | 9000        | 9000             | 9000        | 9000              | 9000        |
| Emb Wind capacity (MW)     | 6000    | 9000             | 6000        | 12000            | 6000        | 15000            | 6000        | 18000             | 6000        |
| Emb Solar capacity (MW)    | 13000   | 14000            | 13000       | 15000            | 13000       | 16000            | 13000       | 17000             | 13000       |
| BMU Wind capacity (MW)     | 20000   | 20000            | 23000       | 20000            | 26000       | 20000            | 29000       | 20000             | 32000       |
| BMU Solar capacity (MW)    | 0       | 0                | 1000        | 0                | 2000        | 0                | 3000        | 0                 | 4000        |
| Wind/Solar load factor     | 0.71    | 0.71             | 0.71        | 0.71             | 0.71        | 0.71             | 0.71        | 0.71              | 0.71        |
| BMU Wind generation (MW)   | 14200   | 14200            | 16330       | 14200            | 18460       | 14200            | 20590       | 14200             | 22720       |
| BMU Solar generation (MW)  | 0       | 0                | 710         | 0                | 1420        | 0                | 2130        | 0                 | 2840        |
| Wind Action required (MW)  |         | 11040            | 10330       | 13880            | 12460       | 16720            | 14590       | 19560             | 16720       |
| Proportion of wind BOAd    |         | 78%              | 63%         | 98%              | 67%         | 118%             | 71%         | 138%              | 74%         |
| Marginal Wind Price -£/MWh |         | £ 199            | £ 199       | £ 249            | £ 199       | £ 500            | £ 199       | £ 500             | £ 199       |
| Wind Action cost           |         | £ 1,098,480      | £ 1,027,835 | £ 1,728,060      | £ 1,239,770 | £ 4,180,000      | £ 1,451,705 | £ 4,890,000       | £ 1,663,640 |
| Cost differential          |         |                  | £ 70,645    |                  | £ 488,290   |                  | £ 2,728,295 |                   | £ 3,226,360 |