

Emailed to: MarketReporting@nationalgrideso.com

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To whom it may concern,

ESO Draft Guidance Note – Good Industry Practice in relation to Final Physical Notification accuracy

Scottish Renewables welcomes the ESO's draft Guidance Note which sets out proposed measures to improve the accuracy of Final Physical Notifications (FPNs) submitted by Balancing Mechanism Units (BMUs).

Our members are keen to engage constructively with the ESO to improve the accuracy of FPNs. However, we are concerned that the 3-week window given to provide feedback on the draft Guidance Note is insufficient to allow proper scrutiny of the proposed measures and therefore allow the ESO to fully understand the implications of these changes. The short consultation window also means that generators are limited in their ability to set out alternative proposals. It is for this reason that some of our members believe that measures to improve FPN accuracy should be taken forward through the formal grid code modification process.

As the guidance on Good Industry Practice is developed further, we encourage the ESO to engage closely with generators to ensure that a fair, proportionate and effective solution to improving FPN accuracy is reached in partnership with the operators of impacted BMUs. As a minimum, the ESO should consult again on a revised draft Guidance Note to allow industry to thoroughly analyse the impact of proposed changes. Scottish Renewables will likewise be encouraging our members to engage with the ESO to ensure an optimal solution can be reached.

Yours sincerely,



Andrew MacNish Porter
Head of Economics and Markets | Scottish Renewables
amacnishporter@scottishrenewables.com