



Update on a non compliant energisation of a new circuit at Tilbury GSP and additional non compliant energisation of a new circuit at Rayleigh GSP

Meeting Name	BSC Panel
Meeting Date	12 January 2012
Purpose of paper	For Information
Summary	This paper provides an update to BSC Panel Paper 190/09 on a recent issue at Tilbury Grid Supply Point (GSP) which had a new circuit energised by National Grid without all the BSC registration requirements being completed and also information on an additional GSP at Rayleigh that was incorrectly energised before all BSC registration requirements had been completed.

1. What have been the issues?

- 1.1 As highlighted at the December 2011 Panel meeting (BSC Panel 190/09¹) the Transmission Company have on five occasions within the last 15 months, energised TSBP and GSP circuits prior to the necessary registration requirements being completed. The most recent of which is Rayleigh GSP which was energised incorrectly on 20 December 2011 even though explicitly instructed not to do so.
- 1.2 Three of these non compliant registrations have given rise to Trading Disputes with a combined materiality of circa minimum £1.2m.
- 1.3 The Panel are aware that in November 2011 a new Circuit at Tilbury GSP was energised prior to the registration requirements being complete and without notification to ELEXON or the CRA. National Grid advised that they were undertaking an internal investigation into this, and working to ensure the incident was not repeated.
- 1.4 On 20 December 2011 a new circuit at Rayleigh GSP was energised prior to the registration requirements being complete and without notification to ELEXON or the CRA which has resulted in another Trading Dispute being raised.

¹ http://www.elexon.co.uk/ELEXON%20Event%20Documents/190_09_Update_on_Tilbury.pdf

2. What is ELEXON and the Transmission Company doing to resolve the current issues and mitigate further occurrences?

- 2.1 The Transmission Company have investigated the Tilbury non-compliance and recommended an action plan to ensure the Code and BSCP25 will be adhered to in the future by the Transmission Company. This is detailed in Attachment A.
- 2.2 Modifications to National Grid process to ensure new registrations are completed in a timely manner are targeted to be in place by March 2012.
- 2.3 ELEXON will support the Transmission Company both through regular planning and review meetings, and through ongoing education of BSCP25 requirements.

3. Summary of recent non compliant energisations.

- 3.1 The Transmission Company have energised five sites within the last 12 months without complying with the Code. A summary of these are contained in the table below, all these were non-compliant and in three cases a Trading Dispute had to be raised:

Site	Incident Detail	Impact	Estimated Impact on Settlement
Rayleigh RAYL_1	This site was energised without all the Registrations being complete and despite explicit instruction not to do so on 23 November 2011.	The CDCA identified Metered Data from new SGT6 on 20/12/2011. National Grid provided BSCP25 registration on 29/12 – as of today [03/01] Proving Test is not completed and Aggregation Rule is not signed off by the registrant. Therefore a Trading Dispute will be required to cover the period 20/12/11 to the registration effective date.	Full analysis on the materiality is not yet possible estimate a minimum of £400,000.
Tilbury TILBB_1	This site was energised without all the Registrations being complete and despite explicit instruction not to do so on 5 November 2011.	The Registration for this site was not completed until 22/11/2011. As we are unable to retrospectively change Aggregation Rules back past the II run, ELEXON have raised a Trading Dispute to cover the Settlement error between Settlement Date 05/11/2011 00.00 and Effective To Settlement Date 21/11/2011 (17 Settlement Days).	Full analysis on the materiality is not yet complete looks to be a minimum of £400,000 and could be considerably more.

Site	Incident Detail	Impact	Estimated Impact on Settlement
A Directly Connected Demand Customer site	This site was energised without all Registrations being complete and without any notification by National Grid or the Supplier of the new connection.	Volumes missing from Settlement for 6 months. This is being rectified by the Trading Dispute process.	There is an approximate material Impact of £400,000
Spennymoor SGT2	This site was energised without all the Registrations being complete and despite explicit instruction not to do so on 2 August 2011.	The CDCA informed us on 26 July 2011 that Circuit SGT2 at Spennymoor was due to energise imminently. National Grid was unable to provide any information on the Circuit, and we did not receive the BSCP25/5.3 Boundary Point Registration form from National Grid until the day after energisation. We had metered data in this case and managed to get the Registration in place quickly enough to avoid raising a Trading Dispute.	No impact on Settlement other than resource required at ELEXON and CDCA to resolve the issues.
Mannington SGT5	This site was energised without all the Registrations being complete on 18 October 2010 and was the issue which first alerted us to problems with the process at National Grid.	In this case the CDCA identified the issue when checking the communications to all Meter Channels on its system. We had Metered Data available and in this case were able to put the other registrations in place quickly enough to avoid raising a Trading Dispute.	No impact on Settlement other than resource required at ELEXON and CDCA to resolve the issues.

4. Next steps

- 4.1 ELEXON has reviewed and commented upon the National Grid action plan and in particular the proposed timescales (ELEXON believe there are four further imminent connections at GSPs).
- 4.2 We have requested an explanation of what went wrong at Rayleigh and confirmation any new reasons are included in National Grid's action plan.
- 4.3 ELEXON will report to Panel, via the ELEXON report, the progress of future registrations against the Transmission Company's action plan which are detailed in Attachment B.

5. Recommendations

5.1 We invite the Panel to:

- a) **NOTE** the information contained in this paper;
- b) **NOTE** the next steps proposed by ELEXON; and
- c) **NOTE** that ELEXON will provide an update on the progress of future registrations against the Transmission Company's action plan.

For more information, please contact:

Dave Welland – Settlement Operations

Dave.welland@elexon.co.uk

020 7380 4365

List of Attachments:

Attachment A – National Grid's response to Meter Registration Failure at Tilbury – Investigation and Next Steps

Attachment B – List of up-coming BMU and GSP registrations

Meter Registration Failure at Tilbury – Investigation and Next Steps

Executive Summary

On 4th November SGT7 (a new infrastructure unit) and associated circuits and metering was energised at Tilbury substation without this registration process having been undertaken, putting National Grid (NGET) in breach of the requirements of the Code, Elexon procedure BSCP25 and NGET procedures TP106 and TP131. This has caused a significant Settlement error, giving rise to Elexon raising a Trading Dispute to address the imbalance. In the last 12 months there have been 3 further instances where the required registration procedures have not been followed, in one instance leading to a Settlement impact of approximately £400k.

Internal investigation within NGET has highlighted a lack of knowledge and full understanding throughout the Transmission business as to the steps required to complete registration. TP106 and TP131, whilst making mention of the need to undertake this process, does not do so in sufficient detail to allow Commissioning Panel members to undertake this process clearly and without doubt.

To address the situation within the Company NGET undertakes to complete a number of mitigating steps. Procedures TP106 and TP131 will be updated to better reflect the required process to be followed to ensure that registration is completed within a timely manner, a detailed guide and updated process map will be communicated to all Commissioning Panel members, briefings will be undertaken within all elements of the business that would be involved with the commissioning and registration of new metering circuits, and an annual planning meeting will be held in mid January of every year to review the upcoming outage season's commissioning requirements. This will be followed by quarterly meetings to ensure any changes in commissioning dates or commissioning personnel has been captured.

Following the initial January meeting, the output data will be shared with Elexon to allow them to both have sight of our proposed commissioning programme and to compare it with data supplied to them by the Meter Operators.

It is further proposed that a review meeting is held between Elexon and NGET at the end of each Outage season to review all commissioning and registration undertaken through the year to ensure that the current revised procedures are ensuring all registration requirements have been successfully captured.

Introduction

It is a requirement of the Code that NGET as a Transmission Company undertakes the full registration of all new GSP circuits or Transmission System Boundary Points (TSBP) with Elexon, before these points are energised. Elexon procedure BSCP25 and NGET procedures TP106 and TP131 cover this process as part of the wider GSP and TSBP commissioning instructions.

On 4th November SGT7 (a new infrastructure unit) and associated circuits and metering was energised at Tilbury substation without this registration process having been undertaken. This was despite four email messages from Elexon to NGET that this unit should not be energised until registration has been completed. As a result a significant Settlement error has occurred requiring Elexon to raise a Trading Dispute to address the imbalance.

Over the last 12 months there have been a further three instances where the registration process has either not been undertaken, or has been undertaken unsatisfactorily requiring Elexon to take action. In two instances Elexon was able to direct additional resource to input the required data before any Settlement run was undertaken therefore avoiding an imbalance, but in the third instance it was not possible to avoid a Settlement error and a Trading Dispute raised to rectify the imbalance.

Current Situation

The new circuit associated with Tilbury SGT7 and associated metering should have been registered with Elexon within 5 working Days of the Commissioning Programme Commencement date (CPCD) this is usually between 6 – 3 months prior to energisation.

In addition NGET should have waited for ELEXON to confirm that all the other associated requirements such as metering registration, aggregation rules, proving tests etc were completed by all relevant parties (not just ELEXON and National Grid) prior to energising the circuit. ELEXON provides a regularly updated tracker spreadsheet to National Grid that details whether these steps have been completed – Local Work Instructions (LWIs) will be updated to reflect that the check lists are received and to be used as a status update. LWIs should also be clear that energisation should not take place until clear confirmation from ELEXON is received.

The Unit was energised onto the system on 05th November 2011 without being registered with Elexon, despite several email messages from Elexon to NGET Commercial instructing them that it should not be energised until registration was complete.

The Commissioning Panel was aware of the need to undertake registration, as part of TP106 and TP131, and the subject was discussed several times during Commissioning Panel meetings, although there was a lack of understanding of what was actually required in order to register the new unit.

Email messages from Elexon were received by NGET Commercial instructing NGET not to energise this unit until the required form and data had been provided and Elexon had confirmed that meter registration was complete. Unfortunately due to changes in personnel and an obvious knowledge gap the emails were not passed on to other personnel within the Company who could take the appropriate steps to ensure registration was completed or at least prevent SGT7 from being commissioned.

The current process is that the Commissioning Officer provides the required data to NGET Commercial Support, who completes form 5.3 which is then faxed on to Elexon for registration on to the required systems.

The Commissioning Panel members and Chair believed Siemens (metering system supplier) had completed the registration process in it's entirety following receipt of an email from Siemens confirming (their element of the) registration process was complete.

There is a lack of understanding / knowledge gap within NGET Commercial, Investment and Delivery and general Commissioning Panel members. Current NGET procedures do not explain the registration process and the required steps to undertake this procedure in sufficient detail.

Next Steps

An internal **Annual Review and Planning Meeting** will be held every year in mid January, following the handover from Year Ahead Planners to Current Year Planners. This will involve Current Year planners, NGET Commercial Customer Account Managers, Commercial Admin Support and Investment and Delivery Team Leaders. It will review the current proposed commissioning dates for the forthcoming Outage season, and produce a spreadsheet detailing affected Sites, scheme numbers, circuits, commissioning dates, Project Managers and Commissioning Officer / Panel Chair appointed to the scheme (where known). This will **be in place for Mid January 2012**.

Subsequently there will be a **Quarterly Review Meeting** which will review current and future commissioning schemes, to ensure that registration has been completed correctly, highlight any potential issues, and take into account any changes in personnel and commissioning dates. This will **start in April 2012**.

TP106 and **TP131** will be **modified** to better reflect the required steps Commissioning Panel members need to undertake to ensure new registrations are completed in a timely manner and in accordance with the Code and BSCP25 requirements. This will be in place **by March 2012** once the updates are written and the full governance process followed.

NGET **Commercial Admin Support** will **set up an email .box account** solely for the purposes of new boundary point registration. This will form the main communication hub between site Commissioning Panel members, NGET Commercial Support and Elexon. This will provide a clear audit trail; Commissioning Officers will email the .box with the details required in order for Commercial Support to complete Form 5.3 and associated documents / SLDs. This will be sent on to Elexon, the receipt of which, and following registration the confirmation from Elexon that registration is complete will be forwarded to the relevant Commissioning Panel for inclusion in site commissioning document packs. This will be **in place from mid January 2012**. The updated procedures will make it clear that it is the responsibility of the Commissioning Panel to inform Commercial Support of impending meter registration requirements for onward dissemination to Elexon. The Project Manager and Commissioning Panel members will be identified as part of the January plan meeting.

All **Commissioning Panel members** will be **emailed a reminder** of the process required to undertake accurate and timely boundary point registration, complete with the relevant extract from BSCP25, and a clear NGET process Map detailing the necessary steps that should be followed, and the information required. This will be **completed by Mid February 2012**.

Investment and Delivery team leaders, and NGET Commercial **Customer Account Managers** will be **briefed** on the required process, and revised Process Map **by the end of February 2012** to ensure this knowledge gap is filled.

Conclusion

By not correctly following both NGET's internal procedures, and Elexon guidance procedure the Company has been in breach of its BSC Code requirements in ensuring that all new GSPs and Boundary Points are correctly registered with Elexon in a timely manner. This has caused Elexon to divert additional resource to attempt to minimise any Settlement imbalances, and on two occasions within the last 12 months raise Trading Disputes to recover the imbalances.

Steps are now being put in place to prevent this occurring again in the future; NGET will be updating internal procedures TP106 and 131 to clearly inform Commissioning Panel members and the wider business of the necessary steps required to undertake the registration process. This will be widely briefed throughout the organisation in order to fill any knowledge gaps and provide escalation routes. Admin procedures are being enhanced including the creation of a dedicated .box account to provide a clear audit trail of all communication and registration documents between site Commissioning personnel, NGET Commercial and Elexon. An Annual Review meeting will occur in mid January every year, with Quarterly Review meetings to capture and review upcoming outage year commissioning and the required registration undertakings have been completed.

It is also planned that regular liaison meetings continue to be held between Elexon and NGET Commercial, with a final end of year review meeting to ensure NGET has been undertaking the registration process correctly and to highlight and address and potential or accurate failures to correctly undertake this process.