

# 211/05 - APPLICATION FOR A NON-STANDARD BM UNIT CONFIGURATION AT SELLINDGE CONVERTOR STATION

<b>MEETING NAME</b>	ISG 211
<b>Date of meeting</b>	20 November 2018
<b>Paper number</b>	ISG 211/05
<b>Owner/author</b>	Katie Wilkinson
<b>Purpose of paper</b>	For Decision
<b>Classification</b>	Public
<b>Summary</b>	ENGIE Power Limited has applied for a non-standard BM Unit for the Sellindge Converter Station. We invite the ISG to approve the application.

## 1. Background

- 1.1 In July 2006, National Grid Company (NGC) transferred ownership of two station transformers (1 and 4) associated with the Sellindge Converter Station<sup>1</sup>, to its wholly owned subsidiary, National Grid Interconnectors Limited (NGIL). These station transformers are both directly connected to the Transmission System at separate Boundary Points (BP) and feed the 11kV station boards. These station boards also feed the low voltage ancillary items (e.g. cooling system and lights) in NGC's 400kV substation (Attachment B).
- 1.2 NGIL sought to register the Metering Equipment<sup>2</sup> for the station transformers in the Central Meter Registration Service (CMRS) in September 2009. However, it did not have the requisite Market Role (Supplier) registered in CMRS to do so. According to BSC Section K1.2.2b(i), where an Import constitutes a supply of electricity to premises which are connected to the Total System the person who supplies the electricity is responsible for the Import and for registering a Metering System(s) that measures that Import.
- 1.3 In October 2016, the Metering team in ELEXON, while reviewing its records of approved Metering Dispensations, noticed that NGIL was granted a confidential Metering Dispensation (D/338) at the ISG meeting on 20 February 2007 (ISG73/29) for the station transformers' Metering Equipment. However, contrary to what is usually expected after a Metering Dispensation has been granted, the Metering Equipment was not subsequently registered for Settlement purposes as a Metering System.
- 1.4 The Metering team contacted NGIL on 7 November 2016 to enquire if the connections to the station transformers constituted BP's. NGIL then responded on 24 April 2017 to confirm that two BP's do exist at 400kV. Thereafter, ELEXON advised NGIL that the Metering Equipment associated with the station transformers must be registered for Settlement purposes as this is required under BSC Section K2.1.1(a).
- 1.5 On 8 September 2017, NGIL informed ELEXON that ENGIE Power Limited (ENGIE) had agreed to be the supplier for the Sellindge Converter Station, and would assist with the registration process. Following the Trading Disputes Committee's (TDC) approval of Trading Dispute DA811 on 04 October 2018, it was agreed that ENGIE will backdate the BM Unit 'Effective from Date' to its Supply Start Date (SSD) of 15 February 2018. Prior to the SSD, any imports would have been treated as Transmission Losses.

<sup>1</sup> The Sellindge Converter Station is the UK terminal for the France Interconnector. The link is used to transfer electricity between the UK and French networks.

<sup>2</sup> The 'Tariff Meters' and associated current and voltage transformers shown on the 11kV side of 400/11kV station transformers (Tx 1 and Tx 4) in Attachment B.

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## 2. Non-standard BM Unit application

- 2.1 BSC Section K3.1.4c) states that "premises (of a Customer supplied by a Party) which are directly connected to the Transmission System, provided that such premises are so connected at one Boundary Point only" shall be a single BM Unit. Therefore the standard BM Unit configuration for this site would be to register two separate BM Units.
- 2.2 Where the configuration of Plant and Apparatus does not fall into a category of standard BM Unit configuration set out in BSC Section K3.1.4 (and summarised in Appendix 1 – BM Unit Configurations) or where the responsible Party considers a different configuration would satisfy the requirements of paragraph K3.1.2, the ISG, under authority delegated from the BSC Panel, must determine the outcome for an application for a non-standard BM Unit configuration (in accordance with Section K3.1.6).
- 2.3 ENGIE wants to register a single BM Unit for the Sellindge Convertor Station. As this would not satisfy the requirements for a standard BM Unit, ENGIE is seeking approval for a non-standard BM Unit in accordance with BSC Section K3.1.6.
- 2.4 ENGIE believes that it is reasonable and practical to consider and treat the Sellindge Convertor Station as a single BM Unit on the grounds of cost effectiveness, and enhanced customer experience.
- 2.5 ENGIE is of the opinion that combining these two BM Units into a single BM Unit reduces cost and complexity associated with their registration, operation and Settlement. If two BM Units were required, there are recurring costs associated with maintaining two CVA BM Units; these would be higher than otherwise necessary, with no identifiable benefit. In line with Section D Annex D-3 paragraphs 3.1 (b) and (c), assuming two BM Units (and one MSID) were required, ENGIE would be incurring an annual charge of £3,000<sup>3</sup> as opposed to £1,800, if only one BM Unit (and one MSID) was registered.
- 2.6 ENGIE has also stated that they intend to bill the customer as a single invoice, as it is more efficient to aggregate the demand from the two BP connections under a single BM Unit. Having a single BM Unit would also avoid the need to split the Metering System channels associated with the one CVA MSID across two BM Units. Also, the Final Physical Notification (FPN) Flag for this BM Unit will be set to 'No', therefore it is not intended that the Plant and Apparatus associated with the BM Unit would be subject to any control instructions from the System Operator. As such, one non-standard BM Unit an appropriate and efficient configuration for the site.

## 3. Transmission Company and ELEXON comments

- 3.1 This application has been sent to the Transmission Company and its comments will be provided verbally at the meeting.
- 3.2 ELEXON recommends that the ISG agree this application on the basis that:
- the responsibility for the flows of electricity associated with the BM Unit lie with one Party (Section K 3.1.2 (a));
  - The flows of electricity to the site (whose Plant and Apparatus is comprised in the BM Unit) are capable of independent control from any other flows to or from other Plant and Apparatus not comprised in the BM Unit (Section K3.1.2(b));

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<sup>3</sup> (2 BMUs x 12 months x £100 + 1 MSID x 12 months x £50)

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- all volumes flowing from and to the BM Units will be captured by Metering Equipment which subject to Metering Dispensation D/338<sup>4</sup> is otherwise compliant with the BSC and these volumes will be determined separately from volumes to and from other BM Units (Section K 3.1.2 (c));
- the BM Unit does not comprise Central Volume Allocation (CVA) and Supplier Volume Allocation (SVA) Metering Systems that measure the same Imports or Exports at any one time (Section K 3.1.2 (d)); and
- Although the BM Unit would not be the smallest aggregation of Plant and Apparatus that satisfies K3.1.2 (a)-(c) (Section K3.1.2(e)), there will be no adverse impact on Settlement by registering one as opposed to two BM Units. The Settlement Meters and the Aggregation Rule associated with a single BM Unit will correctly capture all the energy associated with the Sellindge Converter Station.

## 4. Recommendations

4.1 We invite you to:

- a) **APPROVE** a single non-standard BM Unit status for the Sellindge Converter Station.

## Appendices

Appendix 1 – BM Unit Configurations

## Attachments

Attachment A – BSCP15/4.13 – ENGIE non-standard BM Unit application

Attachment B (CONFIDENTIAL) – Sellindge Converter Station SLD

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<sup>4</sup> The Metering Equipment is non-compliant with the relevant Code of Practice however the non-compliances are not material to Settlement and are covered by an approved Metering Dispensation.

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## APPENDIX 1 - BM UNIT CONFIGURATIONS

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The BSC states that a BM Unit shall comprise Plant and/or Apparatus for who's Exports and / or Imports a Party is responsible (Section K3.1.1).

A BM Unit must satisfy the following conditions (K3.1.2):

- responsibility for the BM Unit would lie with one Party;
- it would be capable of independent control;
- it would be visible to the Settlement Administration Agent (SAA) as a metered quantity separately from anything that is not included in the BM Unit;
- the BMU does not comprise of CVA and SVA Metering Systems that measure the same Imports or Exports;
- it would be the smallest aggregation of Plant and Apparatus that satisfies the first three bullets above.

The BSC also sets out a number of standard configurations of BM Units (Section K3.1.4), including:

- a single Generating Unit, CCGT or Power Park Module (PPM);
- a Combined Offshore BM Unit;
- the Imports through the station transformers of a Generating Plant; or
- premises, which are directly connected to the Transmission System, at a single Boundary Point.

The BSC states that a Registrant and/or Central Data Collection Agent (CDCA) / Central Registration Agent (CRA) can apply to the Panel for a non-standard BM Unit configuration in the following circumstances (K3.1.5):

- the Plant / Apparatus does not fall into a category listed in section K3.1.4 or the CDCA / CRA considers that there is reasonable doubt that this is the case;
- the Plant / Apparatus does fall into a category listed in K3.1.4 but the responsible Party considers that a different configuration would satisfy the requirements set out in K3.1.2; or
- there is more than one set of Exports / Imports at a CVA boundary Point and more than one Party is responsible for these.