

Metering Dispensation D/539 – Stable Sidings

Imbalance Settlement Group (ISG)

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Summary **EDF Energy Ltd have applied for a lifetime Metering Dispensation (D/539) from Code of Practice (CoP) 2. This is for the installation of a second set of main and check meters to share the installed measurement transformers at the 22 kV National Rail circuit. Current Metering Dispensation D/266 is related to Stable Sidings.**

We invite the ISG to approve Metering Dispersations D/539 on a lifetime basis.

1. BSC requirements

- 1.1 Section L¹ of the Balancing and Settlement Code (BSC) requires all Metering Equipment to either:
 - comply with the requirements set out in the relevant Code of Practice (CoP) at the time the Metering System is first registered for Settlement under the BSC (L3.2.2); or
 - be the subject of, and comply with, a Metering Dispensation (L3.4).
- 1.2 Section L allows the Registrant of a Metering System to apply for a Metering Dispensation if, for financial or practical reasons, Metering Equipment will not or does not comply with some or all the requirements of a CoP.
- 1.3 The process for applying for a Metering Dispensation is set out in [BSCP32](#)².

2. Background to Metering Dispersations D/539

- 2.1 The Network Rail circuit is directly connected to National Grid's own 22kV busbars at the Acton Lane Substation in Willesden Grid Supply Point (GSP), Southern Electric Power Distribution (SEPD) own the switchgear and Network Rail own the circuit.
- 2.2 Dispensation D/266 allows Metering Equipment to be Registered within Central Meter Registration Service (CMRS) by Southern Electric Power Distribution (SEPD) and Supplier Meter Registration Service (SMRS) by the Network Rail appointed Supplier as amended from time to time. Each registration uses separate Outstations however, share the same Meters and measurement transformers.
- 2.3 EDF Energy Ltd would be commercially tied by the SEPD Meter Operator Agent (MOA) appointment which may differ to their preferred Supplier Volume Allocation (SVA) MOA agent. The current SVA Outstation is separate to the Meter and the Metering Equipment is no longer supported by the manufacturer and presents a risk to Settlements upon failure.
- 2.4 The proposal is to:

¹ 'Metering'

² 'Metering Dispersations'

- install a second set of main and check Meters to share the installed measurement transformers;
- The new facility will ensure both CMRS and SMRS Metering Systems are independently operated and maintained by each Registrant through their appointed MOA.

- 2.5 Checks have verified the measurement transformers will not be overburdened by the installation of the additional Meters.
- 2.6 This application only relates to the Meters and not the measurement transformers as the site works proposed do not constitute a material change to the Metering System. CoP 2 states “Where a material change to a Metering System takes place, then this Metering System must be modified to comply with the most recent version of this Code of Practice. Changes to a Metering System are considered to be material where they constitute a change to:
- Switchovergear containing measurement transformers; and/or
 - The primary plant associated with the Metering System i.e. the measurement transformers.

Where a Metering Dispensation applies, and where the Actual Metering Point is not at the Defined Metering Point, a material change affecting the Defined Metering Point may not affect the Metering System at the Actual Metering Point.”

3. Metering Dispensation D/539 – Stable Sidings

- 3.1 EDF Energy Ltd has applied for a lifetime Metering Dispensation (D/539) from CoP2 (Attachment A). The Metering Dispensation application is for the location of new Metering Equipment to install a second set of main and check Meters to share the installed measurement transformers at the 22 kV Network Rail circuit.
- 3.2 The work to retro fit additional Current Transformers (CTs) and replace the, or add an additional, Voltage Transformer (VT) would require a shutdown affecting the end customer Network Rail. Due to the age and construction of the switchgear, there is no direct replacement VT that can be purchased to provide a dedicated winding per metering system.
- 3.3 The Metering Equipment associated with the CVA Metering System is no longer supported by the manufacturer and part of the Metering Dispensation request recognises this and proposes a change to Meters with integral Outstations.
- 3.4 The new Metering Equipment (i.e. the Meters) will be to CoP2 standards.
- 3.5 There are no losses to be taken into account.
- 3.6 SEPD have applied for a Metering Dispensation (D/533) that ISG approved in February 2022 ([ISG250/02](#)) on the condition that the appointed Supplier of the Network Rail site MSID will also apply for a Metering Dispensation for their own Metering Equipment as the Registrant of that Metering Equipment.

4. MDRG comments

- 4.1 We circulated the Metering Dispensation applications and attachments to the Metering Dispensation Review Group (MDRG) for comments (Attachments A - C).
- 4.2 We received no responses from MDRG Members. For the associated Metering Dispensation (D/533) We received two MDRG Members responses, summarised below:
- 4.3 One MDRG Member supported Metering Dispensation D/533, on the following basis:
- Accuracy of Settlement is not impacted.
- 4.4 One MDRG member did not support Metering Dispensation D/533 who stated, “By allowing two sets of metering equipment there is a risk that each will measure different values which will be applied independently in each settlement arrangement. This equally applies to any estimated data which could follow different estimation processes.”

5. LDSO (and NETSO) comments

- 5.1 The affected LDSO is also the applicant for the associated Metering Dispensation (D/533) and has no comments on this Metering Dispensation.

5.2 We received no comments from the NETSO but for the associated Metering Dispensation (D/533) they had no comments.

6. Elaxon's view

- 6.1 Elaxon supports this Metering Dispensation application as it is a more robust solution to not rely on obsolete unsupported Metering Equipment. There is no impact to Settlement, with independently operated and maintained Metering Equipment by each Registrant and appointed agent will give clarity of responsibilities and escalation routes for these Metering Systems. Both Metering Systems will also meet the Overall Accuracy requirements for CoP2.
- 6.2 We also believe that the potential issue raised by the MDRG member (in response to the associated Metering Dispensation D/533) is already an issue with the current Metering Dispensation (D/266) with common equipment and separate estimation techniques defined in the BSC for CVA and SVA Registered sites, but has an increased risk with obsolete equipment and this solution helps to mitigate that risk.

7. Recommendations

- 7.1 We invite the ISG to:
- a) **APPROVE** Metering Dispensation D/539 from CoP2, for the installation of the Metering Equipment associated with Stable Siding, on a lifetime basis.

Attachments

Attachment A – Metering Dispensation application D/539 – Stable Siding

Attachment B – Single Line Diagram – Stable Siding

Attachment C – Copy of Metering Dispensation D/266

For more information, please contact:

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