

ISG200/04 – APPLICATION FOR A NON-STANDARD BM UNIT FOR LONDON GATEWAY PORT

MEETING NAME ISG 200

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Purpose of paper Decision

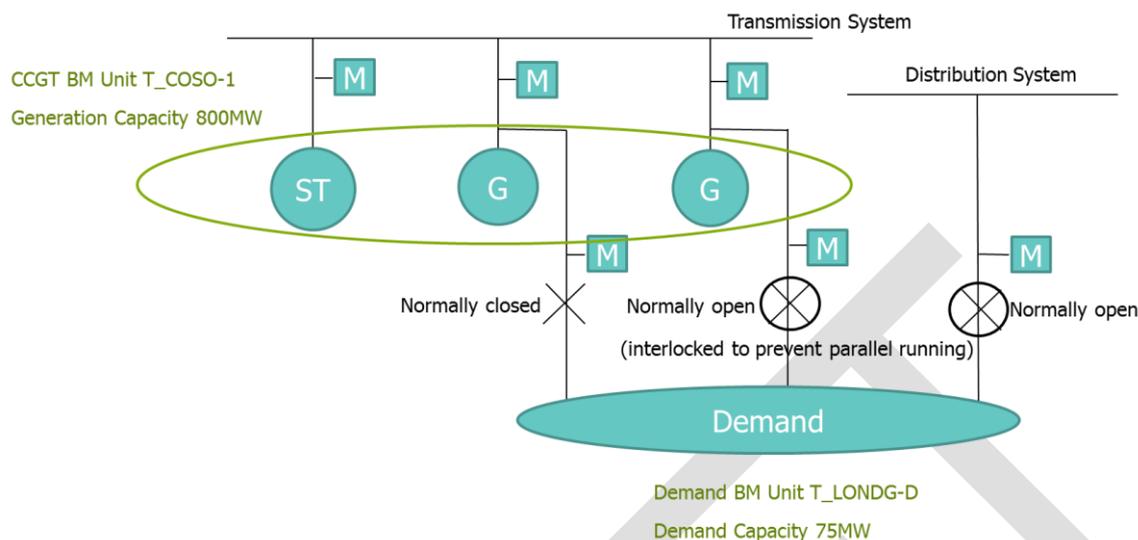
Classification Public

Summary The Central Registration Agent (CRA) considers that there is reasonable doubt that the Plant and Apparatus associated with the London Gateway Port falls into a category listed in BSC Section K3.1.4. The CRA is therefore referring the establishment of the BM Units to the ISG. We invite the ISG to approve the non-standard BM Unit for London Gateway Port.

1. Background

- 1.1 Coryton Power Station is an 800MW Transmission System connected Combined Cycle Gas Turbine (CCGT) Power Station located at Thurrock in Essex. Coryton Power Station has two gas turbine Generating Units and one steam turbine Generating Unit and as a CCGT is registered as a single standard BM Unit, 'T_COSO-1', by Lead Party Coryton Energy Company Limited. Coryton Power Station has two Transmission System Boundary Points.
- 1.2 London Gateway Port is an existing deep sea port and rail terminal situated on the River Thames and close to Coryton Power Station. Coryton Energy Company Limited is registering the plant and apparatus at the London Gateway Port in CVA. It is a demand site of 75MW with proposed BM Unit Id 'T_LONDG-D'. London Gateway Port is currently connected to the Distribution System and registered in the Supplier Volume Allocation (SVA) arrangements but Coryton Energy Company Limited is building a private wire connection between the port and the Power Station so that Coryton Power Station can supply London Gateway Port. Since Coryton Power Station is connected to the Transmission System and London Gateway Port therefore has the potential to Import from the Transmission System, Coryton Energy Company Ltd is going to register and meter the Port's Plant and Apparatus in a BM Unit.
- 1.3 London Gateway Port has two points of connection to Coryton Power Station, one connection to each of the gas turbine Generating Units (Attachments A, B and C). It will also retain its Distribution System connection. An interlocking system will mean that London Gateway Port will only ever be able to be fed through one connection, i.e. one or other of the Coryton Power Station Generating Units or the Distribution System connection (Attachment D). This is shown below in a simple diagram.

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- 1.4 It is possible for London Gateway Port to be fed with some power from the UKPN connection and some power from the power station connection in isolation. However, as explained in the Operational and Maintenance (O & M) document (appendix D) it is not possible to run the circuits in parallel. This means that any energy that flows from the UKPN connection to London Gateway will be correctly measured and accounted for via the SVA registered Metering System Identifiers (MSIDs). Similarly any energy that flows from the power station connection to London Gateway will be correctly measured and accounted for in Settlement via the BMU unit comprising new MSID 7351. Due to the interlocking arrangements explained in Section 3 of the O & M document it is not possible for energy flowing from one connection to “feed through” and be double counted for both the SVA and CVA registered Metering Systems. Section 6.2 of the O & M document details all potential running arrangement configurations at the site. There are nine potential operational configurations and each of these do not permit circuits to be run in parallel.
- 1.5 The CVA registered private wire circuits (connected to Coryton) have interlocking in place to prevent parallel running from an electrical point of view however both circuits can draw power at the same time. In this scenario each circuit would supply different sections of the port which are not interconnected within the port. The majority of the time only one circuit would be used to draw power however during switchover between the circuits due to maintenance on one of the power station Generating Units there could be power drawn on both circuits. The Metering Equipment will appropriately capture the energy used in this scenario and all energy will feed into the BM Unit.

2. Non-Standard BM Unit Application

- 2.1 On 3 November 2017, Coryton Energy Company Ltd applied to register a standard BM Unit for London Gateway (T_LONDG-D) in accordance with BSCP15 ‘BM Unit Registration’. The Balancing and Settlement Code (BSC) Section K3.1.4 (c) states that the following would be a standard BM Unit:
- ‘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’
- 2.2 The CRA reviewed the BM Unit application against the single electrical line diagrams and in accordance with BSC Section K3.1.5 feels that there is reasonable doubt as to whether the Plant and Apparatus in the London Gateway Port BM Unit meets the requirements of BSC Section K3.1.4(c). Therefore the CRA in accordance with the BSCP Section K3.1.6(a) is referring the establishment of this BM Unit to the ISG.

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2.3 The CRA's concern with the configuration of the BM Unit is its connection points to the Transmission System. BSC Section K3.1.4(c) is clear that directly connected demand BM Units need to be connected at one Transmission System Boundary Point only. The London Gateway BM Unit connects to the Transmission System via Coryton Power Station's two Transmission System Boundary Points, however due to the interlocking system, would only be connected through to one Boundary Point at any one time (except during switchover between the circuits due to maintenance).

2.4 ELEXON has sought legal advice as to whether this configuration meets the standard configuration set out in BSC Section 3.1.4(c) and the legal view is:

'...that this case doesn't fall into the category in K3.1.4(c), so K3.1.6 is applied by K3.1.5 and the case should be referred to the ISG under K3.1.6 for determination.

Although at any one time, the premises are connected at one Boundary Point only, the existence of two connections means that the scenario does not sit comfortably within the K3.1.4(c) category.

The Legal team have assumed that the premises would be considered 'directly connected to the Transmission System' despite connecting via a generator, however note that this circumstance will also be considered as part of the ISG's determination.'

2.5 Coryton Energy Company Ltd has also applied for a Metering Dispensation (D/481) for London Gateway Port due to the Metering Equipment not being at the Defined Metering Point ([ISG200/03](#)) and for a Trading Unit to combine the BM Units relating to Coryton Power Station and London Gateway Port ([ISG200/05](#)).

3. Transmission Company and ELEXON comments

3.1 The Transmission Company has reviewed the non-standard BM Unit and has no issues or objections to it.

3.2 ELEXON recommends that the ISG agree this non-standard BM Unit on the basis that:

- The configuration of the Plant and Apparatus associated with the London Gateway Port is that of a premises that is connected to the Transmission System via Coryton Power Station;
- The Plant and Apparatus is only connected at one Transmission System Boundary Point at any one time¹;
- The Plant and Apparatus satisfies all of the conditions for a BM Unit in the BSC Section K3.1.2
 - The responsibility for the flows of electricity associated with the BM Unit lie with one Party, Coryton Energy Company Ltd (Section K 3.1.2 (a));
 - The Plant and Apparatus associated with the London Gateway Port is capable of independent control from any other Plant and Apparatus (Section K3.1.2(b));
 - All volumes flowing from and to the BM Units will be captured by compliant Settlement Meters, subject to Metering Dispensation D/481, and be visible to the Settlement Administration Agent (SAA) as a metered quantity separately from anything that is not included in the BM Unit (Section K3.1.2(c));
 - The BM Unit does not comprise CVA and SVA Metering Systems that measure the same Imports or Exports at the same time. Although there are both Transmission and Distribution

¹ Although during maintenance, the Port could be fed by both CVA connections to Coryton Power Station. Each feed would serve separate Plant and Apparatus within the Port with no interconnection between the two sets of Plant and Apparatus, so each piece of Plant and Apparatus would only be connected to one Boundary Point at any one time.

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Boundary Points and therefore CVA and SVA Metering Systems, the interlocking system means that either the Plant and Apparatus is supplied by via the Transmission System through Coryton Power Station and is comprised in a BM Unit (T_LONDG_D), or the Plant and Apparatus is supplied by the Distribution System and comprised in a Supplier BM Unit. (Section K 3.1.2(d)); and

- The BM Unit would be the smallest aggregation of Plant and Apparatus that satisfies K3.1.2 (a)-(c) (Section K3.1.2(e)).

4. Recommendations

4.1 We invite you to:

- a) **APPROVE** the non-standard BM Unit for London Gateway Port

Appendices

Appendix 1 – BM Unit Configurations

Attachments

Attachment A (Confidential) – Diagram 23802-01X-V1A-EZ00-00007

Attachment B (Confidential) – Diagram CGPSOL_P51829_0201_1_H KLD FEED A

Attachment C (Confidential) – Diagram CGPSOL_P51829_0203_1_D KLD FEED B

Attachment D (Confidential) – O & M Document Rev 1

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APPENDIX 1 - BM UNIT CONFIGURATIONS

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 BM Unit 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 bullet points above.

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

- a single Generating Unit (GU), Combined Cycle Gas Turbine (CCGT) or Power Park Module (PPM),
- a Combined 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.
- directly connected premises which are connected at one boundary point only

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.