Paper to the GCRP (pp11_33)

OPERATIONAL METERING REQUIREMENTS ON SMALL EMBEDDED POWER STATIONS SUBJECT TO A BILATERAL EMBEDDED GENERATION AGREEMENT

Introduction

Small Embedded Power Stations connecting to a DNO's Distribution Network would generally be registered within a Supplier BMU (i.e. SVA registered), not required to enter into an agreement with NGET and not required to comply with the Grid Code Connection Conditions. However, in the event that the connection of the power station is behind a GSP that exports to the transmission system, or may export following connection of the power station, the DNO is likely to require the power station to enter into a BEGA with NGET before permitting connection. As a consequence, the power station is required to be registered as a BM Unit (i.e. CVA registered) and comply with Grid Code CC.6.5 as a BM Participant, irrespective of whether it intends to actively participate in the BM.

Issue

CC.6.5.6 entitles NGET to require a Small Power Station that is a BM Participant to provide various operational metering indications and alarms to NGET's equipment in accordance with the terms of the Bilateral Agreement. In addition, in the case of a PPM, an additional energy input signal (e.g. wind speed) may be required by NGET. In contrast, no such obligations are placed on Embedded Small Power Stations that are not BM Participants and not party to a BEGA. These requirements placed on a Small Embedded Power Station via a BEGA are likely to result in significant and disproportionately high costs, in obtaining and providing the required operational metering data to a specified NGET substation, which may be a significant distance from the embedded power station site.

A similar obligation may be placed on Embedded Medium Power Stations not subject to a BEGA, via the DNO, to provide operational metering data. However, under CC.6.4.4, this requirement would be subject to the test of NGET having to demonstrate that the power station would have a significant effect on the NETS; a test not applied to Embedded Small Power Stations subject to a BEGA. Moreover, under the provisions of GCRP paper pp08/25 May 2008, LEEMPS are permitted to utilise the internet to provide operational metering data to NGET, as opposed to other Users having to establish a direct connection between the power station and a specified NGET substation.

Discriminatory treatment

The requirement for Small Embedded Power Stations wishing to connect to part of a distribution network that is behind an exporting GSP to enter into an agreement with NGET is essentially a commercial work-around for the treatment of exporting GSPs (unless the industry would support infrastructure reinforcement to prevent such events). Whilst providing a commercial solution to achieve the connection of such embedded power stations, it would be unreasonable to hold the power station responsible for GSP exports in the form of enduring technical obligations, especially when other connected Users may have a more significant impact on the level of GSP exports. Under the circumstances where there is no technical reason preventing the GSP from exporting and no transmission reinforcement required, it is difficult to understand why such power stations should be subject to more onerous technical obligations compared to Small Power Stations connected behind non-exporting GSPs that are not required to enter into a BEGA.

The GCRP is invited to:

(i) Consider whether it is appropriate to place additional technical requirements on Small Embedded Power Stations solely as a result of having to enter into a BEGA with NGET as a condition of connection by the DNO.

(ii) Agree on the appropriate circumstances (if any) under which a Small Embedded Power Station would be required to provide operational metering data, e.g. active participation in the BM, or whether alternative metering arrangements such as applied at the GSP would be more appropriate.

(iii) Consider whether clarification of the Grid Code is required, in the form of a change to the Grid Code or via supplementary information.

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