

DCUSA Issues Form (DIF)

This form should be used by parties to submit matters for consideration to DCUSA Standing Issues Group (SIG).

The completed form should be issued to DCUSA@electralink.co.uk

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Issue Title:	Boundary Metering Registrant Access Provisions
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**Assigned by DCUSA Secretariat*

Originator details	
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Nature of Issue

In January 2012, NGET sought to amend the DCUSA (by way of DCP120) such that, as well as requiring NGET to become the Registrant of the Boundary Metering at the Embedded Interface point (for embedded generation falling within the provisions of the Offshore Transmission regime on transfer of the offshore assets to the Relevant Transmission Licensee) cl 42 would also grant the necessary rights of access to National Grid to the circuits sourcing the metering data from the Relevant DNO's CT/VTs to facilitate the discharge of the obligation in respect of the Boundary Metering. This was to remove the requirement for the owners of the remote/onshore end of the metering systems (i.e. the Relevant DNO) to have to agree access to these metering assets by means of a separate document with a corresponding cost saving to both the NETSO and the Relevant DNO.

A Working Group was formed to consider and develop the proposal but has now been closed. A suggestion was made by the working group that, if NGET accepted an obligation to appoint MOAs who were party to the MOCOPA, the provisions of the MOCOPA would grant the required level of access. On review of this, it would appear that the provisions of the MOCOPA provide no real additional access right and that, even to inspect and maintain a subset of the metering system (as well as excluding the CT/VTs), would require supervision by a DNO SAP. Furthermore, it appears that the terms of the MOCOPA are limited in application such that NGET could not operate under the MOCOPA in its role as Registrant of Boundary Metering or as NETSO.

While no further embedded offshore generators qualifying as offshore transmission systems hold connection agreements at present, future projects cannot be ruled out. These, together with the changes introduced under BSC Modification P294 would raise an apparent conflict, in that under P294 the generator would no longer need to install onshore settlement meters to cover the period between commissioning and transfer of the assets. However, on transfer of the assets the DCUSA would apply a requirement for such meters to be installed to function as System to System boundary meters, to inform the Demand Group aggregate demand. This then raises the question of liability for installation of such metering, and while the DCUSA states that NGET should be registrant of such metering, it does not require NGET to install such metering.

The solution here would appear to be that, as with the considerations of P294, whereby the requirement to install onshore metering pending the transfer of the transmission assets to an OFTO is removed, and rather the offshore readings duly adjusted for losses are utilised, so should this apply to the System to System requirement for metering to inform Group Demand.

If this is adopted then the requirement for NGET to facilitate access to the MOA for the System to System metering is limited to the existing embedded transmission system to system boundaries only.

Solution Overview – if known

Solution description:	To hopefully be developed through the SIG. One possible solution may be to reconsider the requirement for NGET to fulfil the role of
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	Registrant of Boundary Metering under the DCUSA.
Lead time for Implementation:	Early resolution important to reduce ongoing costs of facilitating the necessary access but there is no obvious relevant milestone.