

Tim McCullough
EP Ballylumford
Islandmagee
Larne
Co Antrim
BT40 3RS

22 October 2019

Our Ref – NET/E/TH/154

Dear Tim,

RE: EPB Ballylumford - Derogation request under Metering Code Sub-Code No. 2.1, section 3.3.5 of the Grid Code in respect of Unit GT21 at Ballylumford Power Station

Whereas:

- (A) EP Ballylumford Limited (formerly AES Ballylumford Limited) (“**EPB**”) also known as Ballylumford Power Ltd holds an electricity generation licence granted to it on 31st March 1992 (the “**Licence**”).
- (B) The licensee is authorised to generate electricity for the purpose of giving a supply to any premises or enabling a supply to be so given.
- (C) The Grid Code is required to be prepared by SONI Limited, approved by the Utility Regulator (“**the UR**”) and applied by SONI Limited to permit the development, maintenance and operation of an efficient, co-ordinated and economical Transmission System.
- (D) Paragraph 1 of Condition 4 of the Generation Licence requires EPB to comply with the provisions of the Grid Code and the Distribution Code insofar as applicable to it.
- (E) Paragraph 2 (a) of Condition 4 of the Generation Licence provides that the Utility Regulator may, following consultation with the transmission System Operator, namely SONI Limited (“**SONI**”) and the Transmission Owner, namely Northern Ireland Electricity Networks Limited (“**NIE Networks**”), issue directions relieving EPB of specific aspects of its obligations under paragraph 1 of Condition 4 in respect of such parts of the Grid Code and to such extent as may be specified in those directions.

1. On 18th September 2019, the Utility Regulated received a document date 13th September 2019 from EPB (“the licensee”) requesting a further derogation in respect of sections 3.3.5 (a) and section 3.3.5 (e) of the Metering Code Sub-Code No 2.1 which forms part of the SONI Grid Code.

Section 3.3.5 (a) of the Metering Code Sub-Code No 2.1 requires:

“Two sets of CTs to BS7626/HD553S1 and ERS3/1 with a minimum standard of accuracy class 0.2S shall be provided per circuit and shall also meet (to the extent applicable) any meter certification regulations in force at the time”.

Section 3.3.5 (e) of the Metering Code Sub-Code No 2.1 requires:

“Main and check meters must be connected to different CTs”

2. The UR previously had issued a derogation for Unit GT21 to the 15th November 2019¹, unfortunately the replacement CTs were not delivered to the Ballylumford site until August 2019 and this was too late to install and commission them in the planned ST20 outage that commenced on 28th June 2019.
3. EPB have now requested a further derogation request 365 days from 15th November 2019.
4. The UR has taken into account EPB's comments in relation to the proposed extension derogation from section 3.3.5 of the Metering Code Sub-Code No 2.1. EPB stated that:-
 - To avoid having to carry out the works during an unscheduled shutdown, we would instead propose to carry out the installation and commissioning of the Replacement CTs during the GT21 major overhaul outage in Q3 of 2020 that will be planned in conjunction with SONI.
 - This further Derogation request seeks to derogate the non-conformances which result from the non-standard configuration of the metering due to the use of the Temporary CTs for the temporary period until the installation of the Replacement CTs.
5. The UR has consulted with NIE Networks Limited and SONI Limited.
6. In general SONI were supportive of EPB's request for a temporary derogation and recommended that we grant the derogation. SONI also indicated that the temporary metering configuration will remove their facility to observe variations in CT accuracy by comparing readings derived from a duplicate arrangement and proposed to check metering from Unit B21 via SCADA archives on a monthly basis.

¹ <https://www.uregni.gov.uk/sites/uregni/files/media-files/AES%20GT21%20Derogation%20letter%2015112018.pdf>

7. NIE Networks had no additional comments in respect of this derogation request.
8. The UR has also taken into account EPB's view; the derogation will not adversely affect the performance of GT21.
9. Having given due consideration to all relevant factors, including the specific and unique circumstances of this case, the Utility Regulator now gives the following Direction:

Direction

10. Pursuant to its power under paragraph 2 (a) of Condition 4 of the Electricity Generation Licence granted to Ballylumford Power Limited, the UR directs for that the Licensee is relieved of its obligations under the SONI Grid Code - Metering Code Sub-Code No 2.1, section 3.3.5 (a) and 3.3.5 (e) with regards to the metering configuration of CTs to ensure operation of the GT21 unit.
11. The following conditions shall apply:
 - This direction applies until 15th November 2020 however once the replacement CT has been installed and Grid Code compliant this direction will cease to apply.
 - This direction relates solely to the GT21 unit and does not set a precedent for future derogations.

Signed

Name: Tanya Hedley

Date: 22/10/2019

Authorised by and on behalf of the Northern Ireland Authority for Utility Regulation