

Industry standards and practices for commissioning fuel burning generating stations: a call for evidence

The REA is pleased to see Ofgem consulting on the above. We agree it is important to bring absolute clarity on what constitutes commissioning, as with the impending closure of the RO this may become crucial for some fuelled stations.

[Note – this draft has been prepared having consulted with AD, and ACT members, and the assumption is made that it is relevant for all other fuelled generating stations.]

Overview

- We feel that the Ofgem document “**Essential guide – confirming commissioning of generating stations**” provides clear guidance and an accurate view of what constitutes standard industry procedures and tests in the process of commissioning.
- We agree with paragraph 2.7 of the call for evidence, which sets out the distinction between commissioning in the context of the RO and performance and acceptance testing.
- We note that AD generators (although not other fuelled stations) have often been in the position of having to commission by a deadline imposed by Feed In Tariff reductions, and occasionally have sought to commission using bottled gas or possibly even fossil fuel gas. We believe that what has been acceptable for the FIT, should be acceptable for the RO, and are pleased to note that this is indeed the case. We are pleased to note that the call for evidence recognises says “It could [therefore] be possible that a station can commission using a fuel, potentially fossil fuel, which will not be the primary fuel during normal operation.”
- We agree that fuel handling or preparation (e.g. the digester) is not part of the generating station.

Addressing the specific questions in the call for evidence:

Main questions

1) What do you believe are the current:

a) procedures and tests which need to be completed for these types of generating stations to be considered capable of commercial operation?

b) usual industry standards and practices, which define the procedures and tests?

We believe the current procedures and tests comprise the installation and connection of equipment as set out in the guidance¹. We are pleased to note the clarification (point 5 page 2) that with respect to electricity generation - export can take place before the station was capable of commercial operation or conversely, that a station may be capable of commercial operation before first export took place.

2) Are there any documents, such as formal standards, which support your views?

We are not aware of any documents other than Ofgem's *Essential guide – confirming commissioning of generating stations*, which as mentioned earlier, we support.

With respect to Anaerobic Digestion generating stations with a CHP engine, the detailed processes of commissioning are in the hands of the CHP manufacturer. Commissioning takes place over a single day. The operator relies on a letter from the CHP manufacturer stating that the equipment has been commissioned in accordance with usual industry standards and practice on a given date. This has become standard practice in recent years under the FIT and has significant advantages for both operators and Ofgem. The judgement of usual industry practice is made by those with the relevant expertise and there is no ambiguity of the evidence required to demonstrate it.

Supplementary questions

3) What, if any, industry standards or practices exist which dictate that the generating station must be able to comply with the conditions of a permit before it can be considered capable of commercial operation?

To our knowledge, for engines and CHP plant operating on biogas or syngas, the relevant environmental permit (i.e. under Part B Local Air Pollution Prevention and Control (LAPPC), Local Authority Industrial Pollution Prevention and Control (LA-IPPC) or a permit from the Environment Agency) is not relevant to the question of whether a generating station can be considered capable of commercial operation. The plant will have to comply with its permit, of course, but this would be relevant to performance and acceptance testing, rather than commissioning.

¹ i.e. Connection – as evidenced by the G59 witness test certificate signed by the DNO (or equivalent for transmission connected generating stations), and Installation of equipment – as evidenced by a signed declaration or handover certificate by the installer or commissioning engineer

- **4) What, if any, industry standards or practices exist which dictate that the relevant commissioning procedures and tests, required for a station to become capable of commercial operation, can only be completed once the station is running on the primary fuel?**

To members knowledge there are no standard or specific practices that manufacturers' or installers use which require that an engine must be running on its primary fuel in order to sign off on commissioning reports.