CONGESTION INFORMATION RESOURCE - DRAFT DETERMINATION REPORT

PREPARED BY: Electricity System Operations Planning and Performance

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FINAL

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NOTICE OF SECOND STAGE OF RULES CONSULTATION

[National Electricity Rules Clause 8.9]

Congestion Information Resource Guidelines

This Notice of Second State of Rules Consultation informs all Consulted Persons of the second stage of consultation on Congestion Information Resource guidelines.

The consultation is being conducted under clause 3.7A & 3.4.3 of the National Electricity Rules (**Rules**) in accordance with the Rules consultation requirements in clause 8.9 of the Rules.

Date of notice

This Notice of Second Stage of Rules Consultation was issued on 29 April 2011.

First Stage of Consultation

AEMO issued the Notice of First Stage of Rules Consultation on 21 February 2011.

Three submissions were received. All submissions have been published on the AEMO website.

There were no requests for meetings.

AEMO has considered the issues raised in the submissions and has now produced a Draft Determination and Report.

The Draft Determination and Report is now available to all Consulted Persons for their consideration.

Objectives of the consultation

- To provide Consulted Persons with the opportunity to be involved in the development of the congestion information resource (CIR)
- To ensure that Consulted Persons are properly informed about the proposed and the final outcome

Background

In June 2008, the AEMC published the final report of its congestion management review (CMR). The CMR final report and other associated reports published by the AEMC during its

congestion management review provide important background information relevant to this consultation. That material is available on the AEMC website[1].

On 19 February 2009, the AEMC received a Rule change proposal from the MCE in respect of the congestion information resource (CIR). The AEMC then commenced a fast tracked Rule change consultation process. Following completion of that consultation, the National Electricity Amendment (Congestion Information Resource Rule) No 16 2009 commenced operation on 1 September 2009. Full details of the Rule change consultation leading to the making of this Rule are also available on the AEMC website. It should be noted that the information published by the AEMC in conjunction with its Congestion Management Review, and with the making of this Rule is relevant background to this consultation.

AEMO established the interim CIR in October 2009 and commenced a consultation on the first CIR in December 2009. At the completion of the consultation in April 2010, the guide to the CIR was published on the AEMO website.

As per the guide to the CIR, AEMO will annually conduct a formal stakeholder consultation in accordance with clause 3.7A (d) to determine how, or if, the CIR Guidelines should be changed.

On that basis, AEMO is keen to understand what improvements to the CIR stakeholders would like AEMO to put in place through the CIR Guidelines, and the priority of those proposed improvements.

Matter under consultation

The matter under consultation is identified in clause 3.7A of the Rules. This clause provides:

> (k) *AEMO* must develop and *publish* guidelines (the *congestion information resource guidelines*) in relation to:
>
> > (1) the categories of information to be contained in the *congestion information resource* including the source of that information;
> >
> > (2) the scope and type of information to be provided by *Transmission Network Service Providers* in accordance with paragraphs (n) and (o);
> >
> > (3) the processes to be implemented by *AEMO* to obtain the information from *Transmission Network Service Providers* in accordance with paragraphs (n) and (o);
> >
> > (4) the determination of the intervals for updating and *publishing* the *congestion information resource* under paragraph (e); and
> >
> > (5) the processes to be implemented by *AEMO* for providing *Market Participants* with information under paragraph (g).

The consultation process

[1] See AEMC website at: http://www.aemc.gov.au/electricity.php?r=20070416.102156

The following table contains an outline of the consultation process, including key dates. Please note that some of these dates are proposed dates and may be subject to change by AEMO.

PROCESS	DATE
Closing date for submissions received in response to the Notice of First Stage of Rules Consultation	29 March 2011
Publication of the draft determination and invitation to make submissions in response to the Draft Determination and Report	29 April 2011
Closing date for submissions received in response to the Draft Determination and Report	16 May 2011
Publication of the Determination and Report	28 June 2011

Invitation to make submissions

AEMO invites submissions on the Draft Determination and Report on the Congestion Information Resource Guidelines.

Comments are also invited on any other issues relating to the subject matter of the consultation.

Please identify any information in your submission that you consider to be confidential and provide the reasons why you wish that information to be treated as confidential. AEMO reserves the right to publish material that it does not consider to be confidential, despite your submission as to its confidentiality.

You should also note that material identified as confidential may be accorded less weight in the decision-making process than material that is published.

Closing date for submissions

Submissions in response to this Notice of Second Stage of Rules Consultation should reach AEMO by 5:00pm EST on 16 May 2011.

AEMO has discretion to consider late submissions. Any late submission should explain:

- the reason for the lateness; and
- the detriment to you if AEMO fails to consider your submission.

Contact details

AEMO prefers that submissions be forwarded in electronic format (both pdf and Word) as they will be published on the AEMO website.

Please send all e-mail submissions to Ben Blake at ben.blake@aemo.com.au

Alternatively, you may post submissions to:

Ben Blake

Manager Electricity Constraints, Electricity System Operations Planning & Performance

AEMO

P.O. Box 7326

Baulkham Hills BC NSW 215

1. Background

1.1 Matter under consultation

Congestion Information Resource Guidelines

The matter under consultation is identified in clause 3.7A (k) of the Rules. This clause provides:

(k) AEMO must develop and publish guidelines (the congestion information resource guidelines) in relation to:

(1) the categories of information to be contained in the congestion information resource including the source of that information;

(2) the scope and type of information to be provided by Transmission Network Service Providers in accordance with paragraphs (n) and (o);

(3) the processes to be implemented by AEMO to obtain the information from Transmission Network Service Providers in accordance with paragraphs (n) and (o);

(4) the determination of the intervals for updating and publishing the congestion information resource under paragraph (e); and

(5) the processes to be implemented by AEMO for providing Market Participants with information under paragraph (g).

1.2 The consultation and decision-making process

The following table provides an outline of the consultation process to date:

PROCESS	DATE
Notice of First Stage of Rules Consultation issued	21 February 2011
Closing date for submissions received in response to the Notice of First Stage of Rules Consultation	29 March 2011
Publication of this Draft Determination and issue of Notice Of Second Stage of Rules Consultation inviting submissions in response to the Draft Determination	29 April 2011

AEMO issued a Notice of First Stage of Rules Consultation on 21 February 2011. A copy of the *First Stage Notice* is contained in **Attachment 1**. The First Stage Notice invited submissions by 29 March 2011. 3 submissions were received.

The table below lists the remainder of the steps in the consultation process, together with the proposed dates for their completion. Please note that the proposed dates are subject to change by *AEMO*.

PROCESS	DATE
Closing date for submissions received in response to this Draft Determination	16 May 2011
Publication of the Final Determination	28 June 2011

2. Interpretation of the Rules

Clause 3.7A (k)-(m) of the National Electricity Rules (**Rules**) states:

(k) AEMO must develop and publish guidelines (the congestion information resource guidelines) in relation to:

(1) the categories of information to be contained in the congestion information resource including the source of that information;

(2) the scope and type of information to be provided by Transmission Network Service Providers in accordance with paragraphs (n) and (o);

(3) the processes to be implemented by AEMO to obtain the information from Transmission Network Service Providers in accordance with paragraphs (n) and (o);

(4) the determination of the intervals for updating and publishing the congestion information resource under paragraph (e); and

(5) the processes to be implemented by AEMO for providing Market Participants with information under paragraph (g).

(l) AEMO must develop and publish the first congestion information resource guidelines in accordance with the Rules consultation procedures by 1 September 2010 and there must be a set of congestion information resource guidelines available and up to date at all times after that date.

(m) AEMO must amend the congestion information resource guidelines in accordance with the Rules consultation procedures.

Further to the above, clauses 3.7A (e) and (f) provide that:

(e) Subject to paragraph (f), AEMO must update and publish the information contained in the congestion information resource (whether in whole or in part) at intervals to be determined by AEMO in accordance with the congestion information resource guidelines.

(f) The intervals determined by AEMO for updating and publishing the congestion information resource must be included in the timetable.

3. Consideration of Submissions

3.1 List of submissions received

AEMO received 3 submissions in response to the *First Stage Notice*.

The following table contains a list of respondents:

RESPONDENT	PARTICIPANT TYPE OR OTHER ROLE
National Generators Forum (NGF)	Generator
Origin Energy (OE)	Generator
Australian Energy Regulator (AER)	Regulator

All submissions were published on *AEMO's* website.

Section 4 considers all material issues. **Appendix 3** details, for each *Consulted Person*, each issue raised and, for issues *AEMO* considers to be non-material, *AEMO's* response.

3.2 Meetings and forums

There were no requests for meetings and no forums were held.

4. Material issues raised by Consulted Persons

Consulted Persons raised the issues detailed in the following table:

ISSUE NUMBER	ISSUE	RAISED BY
1	Address the cause of congestion in the NEM	AER
2	Mis-pricing reports enhanced with further commentary on the causes of congestion	AER
3	Improve the planned outage information made available by TNSPs	AER
4	TNSPs should provide planned outage information in a consistent format	AER
5	Include more detailed transmission diagrams that could improve the usefulness of the Network Outage Schedule (NOS)	OE
6	Publish more information on the causes of constraints	OE
7	Publish more real-time (5 minute) data on major intra-regional transmission elements	OE
8	Provide forecasting of congestion	NGF

9	Develop an indicator of TNSP performance against approved Market Impact Parameter (MIP) incentive target	NGF
10	Report on levels of congestion	NGF
11	Report on changes to planned outages within the pre-dispatch period	NGF
12	Include relevant constraint set for each outage submitted in the NOS report	NGF
13	Include recall time and original date/time within the NOS report	NGF
14	Publish information to show changes in network ratings are occurring between pre-dispatch and dispatch forecasts	NGF
15	Improve correlation between the monthly TNSP plan and hourly NOS report	NGF
16	Context and purpose of constraint equations	NGF
17	Improved transparency in the application of dynamic inputs in pre-dispatch timeframes	NGF
18	Additional education videos would be beneficial	NGF
19	NOS exception reporting process to proceed with priority	NGF
20	Consider exception reporting for transmission equipment ratings	NGF
21	Provide information on ramping constraints	NGF

4.1.1 Material Issue 1: Address the cause of congestion in the NEM

4.1.1.1 Summary of issue

The AER believe that the CIR could do more to address the question of why congestion arises in the NEM. This information is crucial in understanding the impacts of congestion and in developing strategies to manage congestion.

As a starting point, in addition to the annual summary report of the “top 20 constraint” it would be useful if the CIR detailed all instances of congestion according to their cause. Constraints could be categorised according to whether they arose during:

- System normal conditions or
- An outage. If the congestion arose because of an outage, there would be further benefit from knowing whether the outage was:

- Planned or
- Unplanned.

Occasionally congestion occurs as a result of AEMO's intervention, when existing constraints are not adequately managing system security. In these instances it would be useful to understand why the constraint was involved, and what, if any, action was taken as a consequence (including any modifications to the dispatch or Predispatch formulations of any constraint equations).

Information that clarifies the causes of material congestion would have wide range of applications. For instance, it could be used to improve our understanding of settlement residue vales, to assess the efficiency of adopting real-time ratings, and to provide insights into limitations of the network and whether these limitations are being managed efficiently. It could also form the basis of an assessment of whether to take action to relieve non-normal constraints.

4.1.1.2 AEMO response

The equations listed in the 'Top 20 Binding/Violating Constraints' already distinguishes the System Normal conditions by highlighting the system normal constraint IDs in bold.

AEMO will investigate how to include statistics on planned, short notice (within 4 days) and forced outages in the annual report.

AEMO is intending to produce a monthly report on constraints, with similar information to the annual constraint report. AEMO understands from the AER that the main area that needs clarification is why constraint automation was used and if this initiated any modifications to existing constraint equations. The monthly report would include information on why the constraint automation was used and any follow up actions.

4.1.1.3 Outcome

AEMO will investigate how to provide statistical information on outages in the annual Constraint Report.

AEMO will include information on the use of automated constraints and remedial actions in the proposed monthly report on constraints.

4.1.2 Material Issue 2: Mis-pricing reports enhanced with further commentary on the causes of congestion

4.1.2.1 Summary of issue

The mis-pricing information reports could be enhanced by the inclusion of further commentary on the causes of congestion, including qualitative analysis of prevalent constraints. It would also be useful if this report could present locational congestion information at a sub-regional level.

4.1.2.2 AEMO response

The existing mis-pricing report is provided to satisfy rule 3.7A(b) and this includes statistics on a DUID (dispatchable unit identifier) level. AEMO has confirmed with the AER that the reporting in the annual constraint report contains more of the analysis they are seeking.

As a part of the proposed monthly constraint report AEMO will investigate what analysis on mis-pricing can be performed. AEMO expects that providing improved information in this area will be an iterative process and will liaise with the AER on the best way forward.

4.1.2.3 Outcome

AEMO will include analysis on mis-pricing in the proposed monthly report on constraints and liaise with the AER on how to best represent the analysis provided.

4.1.3 Material Issue 3: Improve the planned outage information made available by TNSPs

4.1.3.1 Summary of issue

The present CIR guideline requires TNSPs to publish and provide to AEMO on a monthly basis:

- Details of the forecast timing of network outages, including factors affecting the timing and likelihood of the outages
- Details of the reason for the planned network outage, including the nature and extent of works required, if any
- Any other information that is reasonably requested by AEMO on planned outages planned for the following 13 months

TNSPs meet these requirements by submitting information to AEMO which is made available in the form of "*Market Information on Planned Electricity Network Outages".* The AER consider that there is scope to improve the planned outage information made available by TNSPs, including in relation to:

- Completeness – whether the reports include all relevant planned outages
- Accuracy – whether the details submitted (for instance, in relation to the timing of the outage) are reliable, and
- Consistency – including whether it is possible to trace a planned outage through consecutive RIEMNS reports and whether the information provided by different TNSPs is comparable

The requirement to publish information on planned network outages is subject to a number of qualifications that give TNSPs flexibility to diverge from their published plans. Clearly, TNSPs should not be compelled to adhere to a planned outage schedule if a change in

circumstances means that there are legitimate reasons why the outage should not go ahead as planned. There is a need for qualifications, but if the qualification is too general it can undermine the usefulness of the provision. Poor quality information is of little value to market participants.

To address this, the AER propose that AEMO publish indicators of the quality of planned network outage information. For instance, AEMO could publish data on the accuracy and completeness of planned outage schedules published 1 month, 3 months and 6 months ahead over the previous 12 month period by a TNSP. This approach would provide valuable information to market participants about the accuracy of the information they receive. It would also create an incentive on TNSPs to improve the quality of the data they provide.

In addition, the current guidelines are ambiguous as to which outages must be included. TNSPs currently provide information in relation to planned network outages that "will have or are likely to have a material effect on transfer capabilities". Each TNSP has adopted a different approach for determining whether an outage is likely to meet this criterion. As a result, there are significant differences in the methods that TNSPs use to decide whether an outage should be included in "*Market Information on Planned Electricity Network Outages*".

4.1.3.2 AEMO response

See also Material Issue 4 on AEMO's response to this issue.

It is currently manually intensive to provide the statistics on accuracy of outage schedules where the schedules are provided via spreadsheets. Once all planned outage information is available in a consistent format via NOS, AEMO will investigate providing these statistics.

4.1.3.3 Outcome

AEMO will investigate the feasibility of publishing indicators on the accuracy of planned outage schedules once all outage information is available in a consistent format.

4.1.4 Material Issue 4: TNSPs should provide planned outage information in a consistent format

4.1.4.1 Summary of issue

The AER believes that TNSPs should provide planned outage information in a consistent format. The AER supports the approach used by Transend and TransGrid, which is to submit planned outage information via the Network Outage Schedule (NOS). As a further measure to promote consistency, the CIR guidelines should define the methodology that TNSPs use to determine whether a planned network outage is likely to have a material effect on transfer capabilities.

4.1.4.2 AEMO response

This issue was raised in the 2010 CIR consultation. AEMO is continuing to work with the remaining TNSPs on submitting their outages via the NOS. AEMO's goal is to have all TNSPs publish planned network outages via NOS. However, this is dependent on work by

the TNSPs on their outage planning software and the date by which this can be achieved will need to be discussed with the TNSPs. Once all TNSPs are submitting via the NOS this will ensure consistency between reporting of outages.

4.1.4.3 Outcome

AEMO is continuing to work with the TNSPs to provide their outages via the NOS.

4.1.5 Material Issue 5: Include more detailed transmission diagrams that could improve the usefulness of the NOS

4.1.5.1 Summary of issue

Origin Energy considers that the inclusion of more detailed transmission diagrams could improve the usefulness of the Network Outage Schedule (NOS). Transmission diagrams that sufficiently detail transformers and circuit breakers could assist participants to better gauge the congestion and constraints from outages.

It would be also useful to update these diagrams on a regular basis to reflect transmission augmentation and development, for example the building of double circuit 132 kV lines between Kempsey and Port Macquarie.

A further improvement would be to provide the MVA (de)rating of connection points during periods of outages.

Further clarification from Origin Energy on the (de)rating of connection points: The available capacity of the network at various locations changes according to constraints and outages. Visibility of outages is substantially less than that for binding constraints. Information on current status of network assets would be of great assistance as the actual status does not always follow the NOS, particularly for unplanned outages.

4.1.5.2 AEMO response

AEMO has updated the Network Status & Capability section of the CIR to include links to the diagrams published as a part of the NTNDP:

- Attachment 2 of AEMO's National Transmission Network Development Plan (NTNDP) contains region per page transmission diagrams (http://www.aemo.com.au/planning/0410-0066.pdf)
- More detailed transmission diagrams of the national network are also provided http://www.aemo.com.au/planning/2010ntndp_cd/downloads/Main%20Report/attachments/Additional%20Network%20Diagrams.pdf

AEMO provides similar visibility for constraint equations as outages. Outage information (for those outages that require constraint equations) is provided via the invoking and revoking of constraint sets and this information is available in the GenConSetInvoke table. This occurs for both planned and unplanned outages.

While the NOS data file is updated hourly, this can mean there is some time before short notice outages are reported to the market. AEMO has initiated a project (see Material Issue 18) to provide the NOS information to participants via the MMS Data Interchange.

4.1.5.3 Outcome

AEMO has now included links to the NTNDP transmission line diagrams in the Network Status & Capability section of the CIR.

AEMO has initiated a project to deliver the NOS file via the MMS Data Interchange.

4.1.6 Material Issue 6: Publish more information on the causes of constraints

4.1.6.1 Summary of issue

Origin Energy notes that little information is available on the causes of constraints. Origin Energy understand that there are various reasons why it can sometimes be difficult to publish data on constraint causes – for example it may not be possible to link a constraint to a physical issue such as an outage or that a constraint may arise at short notice such that no information is available as to the cause of the constraint, as was the case for the Queensland generation constraints following the floods. As a general principle, however, the more information AEMO can make available on how it formulates constraint equations, the better participants are able to forecast future congestion

4.1.6.2 AEMO response

In general, constraint equations indicate the cause (thermal overload, stability or FCAS) as well as the outage the constraint equation is designed to manage. Where constraint equations are created at short notice (such as Quick constraint equations) AEMO would normally issue a market notice.

AEMO will be publishing a worked examples document called the Constraint Implementation Guidelines for the different types of constraint equations. This will include information on how constraint equations are formulated in Predispatch and PASA.

Manually built constraint equations include the outage in the description as do the constraint sets they are included in. Where constraint automation has been used AEMO will investigate what can be provided in the monthly constraint report (see Material Issue 1).

4.1.6.3 Outcome

The new AEMO document ‘Constraint Implementation Guidelines’ will better explain the formulation of constraint equations.

AEMO will include information on the use of automated constraints and remedial actions in the proposed monthly report on constraints.

4.1.7 Material Issue 7: Publish more real-time (5 minute) data on major intra-regional transmission elements

4.1.7.1 Summary of issue

It would be useful for AEMO to publish more real time (5 minute) data on major intra-regional transmission elements. If there is an unplanned outage, a constraint may be put in place (which may or may not highlight the actual fault) usually followed by a market notice which may occur somewhat later.

4.1.7.2 AEMO response

AEMO received a request from the NGF in late 2008 to publish more data in real time. This request is taking time due to the need for rule changes. The first stage, publishing the initial MW of generators, was implemented in late 2010. The second stage is to publish transmission flows and is being working on currently

4.1.7.3 Outcome

AEMO is continuing with work to provide more real-time data on major intra-regional transmission elements.

4.1.8 Material Issue 8: Provide forecasting of congestion

4.1.8.1 Summary of issue

The forecasting of congestion relies on many inputs including forecasts of demand, generator availability, network outages and forecasts of network ratings.

AEMO currently has a project underway to improve demand forecasting. In parallel, the AER is requiring generators to improve availability forecasting by considering the expected weather conditions. In this context it is desirable to consider whether the forecasting of network outages and network ratings should also be improved.

It is noted that there is sometimes reconsideration of network outages of network ratings close to dispatch time, for example to reduce the incidence or the effect of congestion. The NGF is not suggesting that there should be any reduction of such activities, but rather it is proposing a consideration of whether these activities could be better forecast.

A further addition to the forecasting of congestion can be enhanced by utilising information from the National Transmission Development Plan (NTNDP) and provide information about potential long term congestion in the future. This could be achieved by selecting various development paths and using monte carlo simulation techniques to determine the likely transmission paths and the congestion that could emerge in the future under different transmission/generation build scenarios.

4.1.8.2 AEMO response

AEMO is reliant on the NSPs for both the rating and outage information. AEMO is of the view that the best way to improve forecasting of ratings and outages is to provide statistics to the market on their accuracy (see Material Issues 3 and 14).

In terms of network ratings, AEMO is investigating ways of improving the forecasting of ratings used in the pre-dispatch timeframe.

Performing studies on long term congestion is better handled as a part of the NTNDP. AEMO recommends that the NGF submit the request for future congestion modelling in the next NTNDP consultation.

4.1.8.3 Outcome

AEMO will investigate providing statistics on rating and outage performance.

AEMO recommends that the issue on long term studies be raised at the next NTNDP consultation.

4.1.9 Material Issue 9: Develop an indicator of TNSP performance against approved Market Impact Parameter (MIP) incentive target

4.1.9.1 Summary of issue

Notwithstanding the provisional nature of any such measure, the NGF believes an indicator showing the cumulative annual performance of a TNSP against its approved MIP incentive target would be beneficial. The measure would attempt to track the hours of material congestion realised, allowing for defined exclusions, and inform market participants of the degree to which a TNSP may be influenced by the incentive scheme throughout the year.

Reposting of the current performance in these aspects will inform any subsequent consideration of these issues, and is therefore recommended for inclusion in the CIR

4.1.9.2 AEMO response

AEMO is of the view that this information is best provided by the AER as this matter is being managed between the TNSPs and the AER. The AER is currently working with the TNSPs on publishing more information on the MIP targets. If more information is made available then AEMO will link to this information from the CIR.

4.1.9.3 Outcome

AEMO to liaise with the AER on publishing more information on the MIP targets.

4.1.10 Material Issue 10: Report on levels of congestion

4.1.10.1 Summary of issue

The AER has previously reported on levels on congestion but this maybe more suitable for AEMO to publish. Reporting on the levels of congestion in MWh and the increase in cost of

dispatch would allow the industry to assess the materiality of congestion in the market. It is also suggested that this report over time be progressively populated with data to show trends over a minimum 10 year period.

4.1.10.2 AEMO response

AEMO is of the view that the current congestion statistics cover what is required by participants. These include:

- the quarterly mis-pricing report
- publishing the marginal cost of constraints (MCC) on a daily basis
- summarising the MCC data in the annual constraint report

4.1.10.3 Outcome

AEMO believes that there is sufficient information regarding the levels of congestion. AEMO has confirmed with the NGF that the above reports satisfy their requirements.

4.1.11 Material Issue 11: Report on changes to planned outages within the pre-dispatch period

4.1.11.1 Summary of issue

The NGF propose that particular consideration be given to changes in planned outages of transmission elements which occur after the planned outage has impacted on pre-dispatch and hence its forecast consequences are likely to be influencing commercial decisions by market participants.

It is recognised that the duration of planned outages has some inherent uncertainty as a result of unexpected plant condition revealed during an outage. It is therefore proposed that reporting in this matter should focus on cancellation of an outage and outage starting times. It is further recognised that there is some inherent uncertainty in the preparations for an outage and consequently the proposal for variation to starting time is to consider only variations of 1 hour or more in starting time.

It is also noted that some planned outages may have very minor effects in pre-dispatch, and hence need not be considered in this context. Given that only a minor reporting task is at issue, the NGF suggests that matter of materiality could be a judgement issue. For example, the NGF consider that a judgement by AEMO that the summated changes in dispatch targets, either up or down, due to an outage would be likely to alter effected generation dispatch by an amount greater than 100 MW should lead to efficient reporting of any material changes to the starting time for that outage.

For outages where the starting time is varied by an hour or more, and when the outage has already had a material impact on pre-dispatch, the following reporting is proposed – a brief, specific and verifiable reason for the cancellation of the outage or change in the planned

outage commencement time, which organisation requested the change to the outage, and the time at which that reason became known to the relevant Network Service Provider.

4.1.11.2 AEMO response

AEMO already provides information to participants regarding changes to network outages. This information is provided through the publication of changes to the start and end times for the invoking of constraint sets in the GenConSetInvoke table.

There is currently no obligation in the rules for TNSPs to supply AEMO or the market with the reasons for changes to network outages. However, similar to the extra information requested to be included in the NOS file during the 2010 CIR, AEMO will liaise with the TNSPs to determine if this information can be provided to the market.

AEMO is of the view that this information is best provided as raw data and that participants make their own materiality decisions.

4.1.11.3 Outcome

AEMO will liaise with TNSPs to determine if reasons for network outage changes can be provided to the market and possibly be included in the NOS output file.

4.1.12 Material Issue 12: Include relevant constraint set for each outage submitted in the NOS report

4.1.12.1 Summary of issue

The NGF considers that AEMO should include the relevant and likely constraint set ID for each outage entry submitted, as well as any other relevant background information. This allows users to sort by those outages that may affect market dispatch. The NGF notes that this information is generally included by the TNSP's in their 13-month plans but not included by AEMO in the hourly NOS report until the outage has been reviewed and progressed from 'Submitted' to 'MTLTP' status

4.1.12.2 AEMO response

Most of the outages in the NOS file include the constraint set information even when the outages are still in the 'SUBMIT' stage. AEMO has confirmed with the NGF that this information has "substantially improved" over time. Each outage needs to be manually assessed before a constraint set can be attached to the outage. In general AEMO's goal is to assess all the outages in the medium term timeframe; however, this is dependent on the time available.

4.1.12.3 Outcome

Constraint set information is included in the NOS output file for most outages when the outages are in the 'SUBMIT' stage.

AEMO will endeavour to include the relevant constraint set information for each outage in the medium term timeframe depending on the time available to assess the outage.

4.1.13 Material Issue 13: Include recall time and original date/time within the NOS report

4.1.13.1 Summary of issue

Consistent with the outline of section 6.1.2 of the guide to the CIR, NGF considers that AEMO should include within the hourly NOS report the relevant recall time, and original date/time of the outage as submitted, the date/time of the last change and the number of times a change to that outage has occurred

4.1.13.2 AEMO response

These items were covered in the 2010 CIR consultation and this is being progressed. AEMO has agreement from the TNSPs to publish the recall time (day and night), date of original inclusion, date of last change and the TNSP that submitted the change. AEMO expects this information to be available in the NOS file by September 2011.

4.1.13.3 Outcome

The recall time and original date/time information is planned be available in the NOS output file by September 2011.

4.1.14 Material Issue 14: Publish information to show changes that occur in network ratings between pre-dispatch and dispatch forecasts

4.1.14.1 Summary of issue

The NGF propose that information be collected and published in the CIR to show the extent to which changes in network rating are occurring between pre-dispatch forecasts and dispatch. To ensure that the information is relevant, the NGF propose that it be gathered only in relation to ratings that are relevant to constraints that either bind in dispatch or were forecast to bind in pre-dispatch.

The NGF note that there is an important distinction between ratings that are dynamically determined by automatic means and those that are provided by manual means. Where ratings are dynamically determined, it is inevitable that even with high quality forecasting, there will be differences between forecast and actual. But these errors should generally be small.

On the other hand, with manual changes to ratings there are not likely to be small differences because these would not justify the manual intervention, but rather occasional larger differences.

Hence the NGF propose that for dynamic ratings, statistical analysis of differences from forecast should be prepared and published in the CIR, whereas for manual changes the circumstances of individual changes should be reported.

For manual changes the reporting should include forecast rating, revised rating, a brief, specific and verifiable reason for the change in the rating, which organisation requested the change to the rating and the time at which that reason became known to the relevant Network Service Provider

4.1.14.2 AEMO response

Currently it is manually intensive and time consuming to produce these statistics due to the way the data is currently stored in AEMO's IT systems. This will shortly change. After this change is completed, AEMO will investigate providing statistics on the performance of network ratings in Predispatch. AEMO will consult via the DPRG as to the content and nature of the report on the rating performance.

Reporting of rating changes is best handled in a real time environment and not via the CIR. As such this is best dealt with by AEMO's operations team (details on this submission has been forwarded to them). There is no rule requirement on TNSPs to provide rating change information.

As mentioned in Material Issue 8, AEMO will be investigating ways of improving the forecasting of ratings in the pre-dispatch timeframe.

In general AEMO has observed that manual changes to transmission ratings have become rarer with the increased usage of dynamic line ratings.

4.1.14.3 Outcome

Once AEMO's IT systems have been modified, AEMO will consult with the DPRG as to the content and nature of the report for the performance of transmission ratings in Predispatch.

AEMO will liaise with TNSPs to determine if reasons for manual network rating changes can be provided to the market.

4.1.15 Material Issue 15: Improve correlation between the monthly TNSP plan and hourly NOS report

4.1.15.1 Summary of issue

The NGF has identified that there are often clear and material inconsistencies between the outages indentified in the two source files. Whilst some differences can be expected towards the end of the monthly reporting – because the TNSP 13-month outlook is a single snapshot undertaken once each month, and the NOS is a 24-month outlook updated every hour – Market Participants should reasonably expect that at the time of publication, the 13-month TNSP outlook and the NOS report are entirely consistent. If this were to be guaranteed, then this approach would ensure that the singular NOS report is the definitive reference for planned outages at any one point in time, rendering the 13-month Market Information on Planned Electricity Network Outage reports effectively redundant. AEMO could then stop publishing these 13-month reports.

4.1.15.2 AEMO response

See response to Material Issue 4.

4.1.15.3 Outcome

AEMO is continuing to work with the TNSPs to provide their outage information via the NOS.

4.1.16 Material Issue 16: Context and purpose of constraint equations

4.1.16.1 Summary of issue

Some NGF members would like to see more context and purpose of the constraints. This would help with understanding.

AEMO sought clarification from the NGF (in regards to the constraint equation description) on this issue and they provided the following:

The description provides a brief explanation about what the constraint is for but doesn't really give the generators much of an idea about what outcomes the operators are trying to achieve.

An example is the Palmwoods to South Pine constraint where all the QLD generators and QNI had negative terms, it gave no real indication how this constraint was supposed to work from a supply/demand balance perspective. Units in that case were being constrained up yet the market price was -$1000 indicating that the network was being over supplied but generation was being increased.

Price outcomes forced CS Energy to trip both Callide B units to avoid large losses but this action would have contributed negatively to the constraint outcome.

Another example is the current Armadale - Tamworth constraint where the dates in the NOS last month (or month before) were suddenly extended from 1-2 weeks to 1-2 months, it would be good to know from a participant perspective what work is being carried out and why.

4.1.16.2 AEMO response

The description on the constraint equation indicates what power system condition the constraint equation is for. This includes the outage(s), the power system limit being managed (such as FCAS, thermal overload or stability). The required outcome is indicated in the description by the transmission element or cut-set being managed.

A number of issues occurred on 2 Nov 2010 with the Palmwoods to South Pine outage which is detailed in the pricing event report on the AEMO website[2]. This included a transmission outage that the constraint equation referred to above was not designed for.

[2] http://www.aemo.com.au/reports/pricing_nov.html

Constraint equations with all negative factors are a valid formulation as these factors are calculated relative to the regional reference node[3]. NEMDE includes an internal constraint for balancing the supply and demand. AEMO will investigate providing a video presentation on these types of constraint equations to improve understanding.

The outage of the Armidale to Tamworth transmission line is due to an augmentation of this line so it will have a higher rating. This project was indicated in section 5.2 of the TransGrid 2010 annual planning review[4]. However, AEMO is aware that information on network changes is spread across a number of locations. AEMO is investigating how and what information on planned augmentations can be consolidated and supplied via the CIR.

4.1.16.3 Outcome

AEMO will produce a video presentation on how LHS factors are calculated for constraint equations, focussing on cases where all the factors are the same sign.

AEMO will liaise with the TNSPs on providing consolidated network augmentation information via the CIR.

4.1.17 Material Issue 17: Improved transparency in the application of dynamic inputs in the pre-dispatch timeframes

4.1.17.1 Summary of issue

On occasions, NGF members have identified significant step changes in constraint equation RHS values within the Predispatch timeframes. It is understood this is an outcome of the approach used to forecast equipment ratings influenced by real time parameters such as wind and ambient temperature. Additional information outlining the approach and parameters adopted for different lines would be appreciated

4.1.17.2 AEMO response

AEMO will provide more information in the future Constraint Implementation Guidelines document on how ratings are applied in the pre-dispatch timeframe.

4.1.17.3 Outcome

AEMO will include information on how ratings are applied in the pre-dispatch timeframe in the future Constraint Implementation Guidelines document.

4.1.18 Material Issue 18: Additional education videos would be beneficial

4.1.18.1 Summary of issue

In general, additional videos will always be beneficial. Suggested topics include:

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[3] The constraint formulation guidelines includes information (section 5.4) on how constraint equation factors are determined: http://www.aemo.com.au/electricityops/170-0040.html
[4] http://www.transgrid.com.au/network/np/Documents/APR%2010%2029-6-10.pdf

- Constraint automation examples
- Use of dynamic ratings and impacts in pre-dispatch
- Executive/summary overview of quarterly/annual statistical reports
- Use of interconnector limits in ST/MT PASA
- Treatment of ratings in 5-minute pre-dispatch timeframes
- Constraint that caused unusual market event, in particular those constraints where market outcomes were not entirely intuitive such as the Palmwoods – South Pine (2/11/2010) and Rocklea flood – related constraint (January 2011)

It would also be helpful to place the videos in 2 different formats on the AEMO website. Some companies restrict access to video media in certain formats. A format that runs on Windows media player (normally a standard installation on desktops) would be helpful.

4.1.18.2 AEMO response

AEMO will investigate providing videos on the topics suggested.

When the 70/71 video was first released in August 2010 it only appeared in one format which resulted in several queries to AEMO on issues with playing the video. Due to this, AEMO changed the web page to provide the videos in two formats, one using YouTube and a link to a downloadable mp4 file (which is playable via Quicktime, Windows media player 12 software or Internet Explorer 9).

The 70/71 video is currently hosted on YouTube (which normally uses Flash to provide the video) or a downloadable mp4 file (which is playable via Quicktime, Windows media player 12 or Internet Explorer 9). Some organisations block videos hosted from YouTube, therefore AEMO will shortly be changing the education videos to be a hosted on the AEMO website. This video will either play via the Adobe Flash software or an mp4 video file. This is similar to how the NTNDP videos are played and as such will be playable on a wide range of devices.

4.1.18.3 Outcome

AEMO will investigate providing videos on the topics suggested by the NGF. AEMO will change its videos so they are no longer restricted to the YouTube format.

4.1.19 Material Issue 19: NOS exception reporting process to proceed with priority

4.1.19.1 Summary of issue

NGF members consider this matter should be dealt with as a matter of priority. The ability to quickly and easily identify any added, removed or amended outage from one NOS report to the next is essential to the efficient management of potential network or congestion related

risks. The NGF considers exception reporting from one hourly report to the next is preferable compared with a summary of changes over the preceding 24 hours

4.1.19.2 AEMO response

In consultation with the DPRG in 2010, AEMO removed the 24 hour summary changes to NOS project. Additionally there is currently a project to deliver the NOS data file via the MMS Data Interchange. Combined with the reporting of the date of last change in the NOS file, this should deliver the NGF's requirement of changes to the NOS file.

AEMO is of the view that the reporting provided by the GenConSetInvoke table for network outage constraint sets is appropriate for informing the market of changes/additions of network outages.

4.1.19.3 Outcome

AEMO has initiated a project to deliver the NOS file via the MMS Data Interchange.

4.1.20 Material Issue 20: Consider exception reporting for transmission equipment ratings

4.1.20.1 Summary of issue

The ability to quickly and easily identify any added, removed or amended transmission equipment ratings implemented by asset owners will also provide for the immediate understanding of potential changes to the network transfer capacities

4.1.20.2 AEMO response

The Transmission Equipment Rating (TER) file, much like the NOS file, is only available from the AEMO website and is overwritten when updated. Along with delivering the NOS via the MMS Data Interchange, AEMO will also deliver the TER file via this mechanism.

Additionally, AEMO is investigating changing the TER file to include whether the equipment uses a dynamic rating and the ID used by constraint equations that references the rating.

4.1.20.3 Outcome

AEMO is investigating adding more information to the TER file.

AEMO has initiated a project to deliver the TER file via the MMS Data Interchange.

4.1.21 Material Issue 21: Provide information on ramping constraints

4.1.21.1 Summary of issue

Pre-dispatch does not incorporate ramping constraints applied before network outages commence. Often, volatile price outcomes occur more so when the ramping constraint is applied, rather than when the actual outage commences (and the outage constraint is applied). Traders may be able to rebid more effectively if it was known which trading

interval(s) the ramping constraint is to be introduced, that is either 1 or 2 trading intervals prior to outage commencement

4.1.21.2 AEMO response

Predispatch does not require ramping constraint equations as it has 30 minutes to ramp to new constraint equations, whereas dispatch only has 5 minutes. AEMO has not observed any cases where ramping constraint equations have caused price volatility; these have generally been due to other factors. There is currently information on the ramping process in in Section 11.2 of SO_OP3715 (http://www.aemo.com.au/electricityops/3715.html). In general, the ramping process is started 35 minutes before the outage start time.

AEMO is currently conducting a review of the ramping process and has included investigating information available to participants as part of the review

4.1.21.3 Outcome

The ramping process is being reviewed by AEMO and the review includes consideration of the information provided to market participants.

5. Determination

AEMO determines the Guide to the Congestion Information Resource in accordance with clause 3.7 A of the Rules. The draft version of this Guide has been published along with this draft determination (ESOPP_29 – Guide to the CIR – Version 1, ESOPP, February 2011). Refer - http://www.aemo.com.au/electricityops/0178-0019.pdf

6. Glossary

The following table contains a glossary of terms and a description of the abbreviations, including acronyms, used in this document.

Note that italicised terms in this document have their meaning as defined in Chapter 10 of the National Electricity Rules. Capitalised terms bear the meaning given in the table below:

ABBREVIATION OR TERM	DEFINITION
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
CIR	Congestion Information Resource
DUID	Dispatchable Unit Identifier
ESOO	Electricity Statement of Opportunities
Guideline to the CIR	A document developed by AEMO to provide users of the CIR with a reference that will assist them to identify what information is available, interpret the information and understand how the information has been

	derived.
MCE	Ministerial Council on Energy
NOS	Network Outage Schedule
NGF	National Generators Forum
NSP	Network Service Provider
NTNDP	National Transmission Network Development Plan
NTS	National Transmission Statement
Rules	National Electricity Rules
TER	Transmission Equipment Rating
TNSP	Transmission Network Service Provider

7. References

- Guide to the Interim Congestion Information Resource, ESOPP, 20 October 2009, http://www.aemo.com.au/electricityops/0100-0002.pdf

- ESOPP_29 - Guide to the CIR – Version 1, ESOPP, 1 March 2010 http://www.aemo.com.au/electricityops/0178-0001.ht

Appendix 1 – Submissions received

[Australian Energy Regulator]

ISSUE	TOPIC	ISSUE	AEMO RESPONSE	OUTCOME
Material Issue 1	Address the cause of congestion in the NEM	See section 4.1.1.	See section 4.1.1.2	See section 4.1.1.3
Material Issue 2	Mis-pricing reports enhanced with further commentary on the causes of congestion	See section 4.1.2.	See section 4.1.2.2	See section 4.1.2.3
Material Issue 3	Improve the planned outage information made available by TNSPs	See section 4.1.3.	See section 4.1.3.2	See section 4.1.3.3
Material Issue 4	TNSPs should provide planned outage information in a consistent format	See section 4.1.4.	See section 4.1.4.2	See section 4.1.4.3

[Origin Energy]

ISSUE	TOPIC	ISSUE	AEMO RESPONSE	OUTCOME
Material Issue 5	Include more detailed	See section 4.1.5.	See section 4.1.5.2	See section 4.1.5.3

	transmission diagrams that could improve the usefulness of the NOS			
Material Issue 6	Publish more information on the causes of constraints	See section 4.1.6.	See section 4.1.6.2	See section 4.1.6.3
Material Issue 7	Publish more real-time (5 minute) data on major intra-regional transmission elements	See section 4.1.7.	See section 4.1.7.2	See section 4.1.7.3

[National Generators Forum]

ISSUE	TOPIC	ISSUE	AEMO RESPONSE	OUTCOME
Material Issue 8	Provide forecasting of congestion	See section 4.1.8.	See section 4.1.8.2	See section 4.1.8.3
Material Issue 9	Develop an indicator of TNSP performance against approved Market Impact Parameter (MIP) incentive target	See section 4.1.9.	See section 4.1.9.2	See section 4.1.9.3
Material Issue 10	Report on levels of congestion	See section 4.1.10.	See section 4.1.10.2	See section 4.1.10.3
Material Issue 11	Report on changes to	See section 4.1.11.	See section 4.1.11.2	See section 4.1.11.3

	planned outages within the pre-dispatch period			
Material Issue 12	Include relevant constraint set for each outage submitted in the NOS report	See section 4.1.12.	See section 4.1.12.2	See section 4.1.12.3
Material Issue 13	Include recall time and original date/time within the NOS report	See section 4.1.13.	See section 4.1.13.2	See section 4.1.13.3
Material Issue 14	Publish information to show changes that occur in network ratings between pre-dispatch and dispatch forecasts	See section 4.1.14.	See section 4.1.14.2	See section 4.1.14.3
Material Issue 15	Improve correlation between the monthly TNSP plan and hourly NOS report	See section 4.1.15.	See section 4.1.15.2	See section 4.1.15.3
Material Issue 16	Context and purpose of constraint equations	See section 4.1.16.	See section 4.1.16.2	See section 4.1.16.3
Material Issue 17	Improved transparency in the application of dynamic inputs in pre-dispatch timeframes	See section 4.1.17.	See section 4.1.17.2	See section 4.1.17.3
Material Issue 18	Additional education videos would be beneficial	See section 4.1.18.	See section 4.1.18.2	See section 4.1.18.3
Material Issue 19	NOS exception reporting process to proceed with	See section 4.1.19.	See section 4.1.19.2	See section 4.1.19.3

	priority			
Material Issue 20	Consider exception reporting for transmission equipment ratings	See section 4.1.20	See section 4.1.20.2	See section 4.1.20.3
Material Issue 21	Provide information on ramping constraints	See section 4.1.21.	See section 4.1.21.2	See section 4.1.21.3

Attachment 1 – Copy the Notice of First Stage of Rules Consultation

Notice of First Stage of Rules Consultation

[National Electricity Rules – clause 8.9]

CONGESTION INFORMATION RESOURCE GUIDELINES

This notice informs all Registered Participants, Intending Participants and interested parties (**Consulted Persons**) that AEMO is conducting a consultation on the congestion information resource guidelines.

This consultation is being conducted under clause 3.7A of the National Electricity Rules (**Rules**) in accordance with the Rules consultation requirements detailed in clause 8.9 of the Rules.

Date of Notice

This Notice of First Stage of Rules Consultation was issued on 21 February 2011.

Objectives of the Consultation

The objectives of the consultation are to:

- To provide Consulted Persons with the opportunity to be involved in the development of the congestion information resource (CIR)
- To ensure that Consulted Persons are properly informed about the proposed and the final outcome.

Background

In June 2008, the AEMC published the final report of its congestion management review (CMR). The CMR final report and other associated reports published by the AEMC during its congestion management review provide important background information relevant to this consultation. That material is available on the AEMC website[5].

On 19 February 2009, the AEMC received a Rule change proposal from the MCE in respect of the congestion information resource (CIR). The AEMC then commenced a fast tracked Rule change consultation process. Following completion of that consultation, the National Electricity Amendment (Congestion Information Resource Rule) No 16 2009 commenced operation on 1 September 2009. Full details of the Rule change consultation leading to the making of this Rule are also available on the AEMC website. It should be noted that the information published by the AEMC in conjunction with its Congestion Management Review, and with the making of this Rule is relevant background to this consultation.

[5] See AEMC website at: http://www.aemc.gov.au/electricity.php?r=20070416.102156

AEMO established the interim CIR in October 2009 and commenced a consultation on the first CIR in December 2009. At the completion of the consultation in April 2010, the guide to the CIR was published on the AEMO website.

As per the guide to the CIR, AEMO will annually conduct a formal stakeholder consultation in accordance with clause 3.7A(d) to determine how or if the CIR Guidelines should be changed.

On that basis, AEMO is keen to understand what improvements to the CIR stakeholders would like AEMO to put in place through the CIR Guidelines, and the priority of those proposed improvements.

Matter under Consultation

The matter under consultation is identified in clause 3.7A of the Rules. This clause provides:

> (k) *AEMO* must develop and *publish* guidelines (the *congestion information resource guidelines*) in relation to:
>
> > (1) the categories of information to be contained in the *congestion information resource* including the source of that information;
> >
> > (2) the scope and type of information to be provided by *Transmission Network Service Providers* in accordance with paragraphs (n) and (o);
> >
> > (3) the processes to be implemented by *AEMO* to obtain the information from *Transmission Network Service Providers* in accordance with paragraphs (n) and (o);
> >
> > (4) the determination of the intervals for updating and *publishing* the *congestion information resource* under paragraph (e); and
> >
> > (5) the processes to be implemented by *AEMO* for providing *Market Participants* with information under paragraph (g).

The Consultation Process

The following table contains an outline of the consultation process, including key dates. Please note that these dates are proposed dates and may be subject to change by AEMO.

PROCESS	DATE
Closing date for submissions received in response to this Notice of First Stage of Rules Consultation	*29 March 2011*
Publication of the Draft Determination and Report and invitation to make submissions in response to the Draft Determination	Currently, proposed date is 3 June 2011
Closing date for submissions received in response to the Draft Determination and Report	Currently, proposed date is 21 June 2011

Publication of the Determination and Report	Currently, proposed date is 3 August 2011

Invitation to make Submissions

AEMO invites written submissions on the congestion information resource guidelines. In particular, AEMO requests comments on:

i. What additional information do stakeholders consider should be included in the CIR?
ii. Of the congestion related information currently published by AEMO, what information should AEMO stop publishing?
iii. Is there adequate information on how constraint equations are formulated and constructed in the CIR?
iv. Is there sufficient information on how AEMO formulates constraint equations in Predispatch and PASA timeframes?
v. Should more videos be added to the CIR and, broadly, on what topics?
vi. Is there enough timely network outage information in the CIR?
vii. Is there sufficient statistical/reporting information in the CIR? If not, what additional information would you like to see?

Comments are also invited on any other issues relating to the subject matter of the consultation.

Please identify any information in your submission that you consider to be confidential and provide the reasons why you wish that information to be treated as confidential. AEMO reserves the right to publish material that it does not consider to be confidential, despite your submission as to its confidentiality.

You should also note that material identified as confidential may be accorded less weight in the decision-making process than material that is published.

Closing Date for Submissions

Submissions in response to this Notice of First Stage of Rules Consultation should reach AEMO by 5:00pm EST on 29 March 2011.

AEMO has discretion to consider late submissions. Any late submission should explain:

1. the reason for the lateness; and

2. the detriment to you if AEMO fails to consider your submission.

Meetings

In your submission, you may request a meeting and specify the reasons why you consider such a meeting is necessary or desirable.

Please note that details of matters discussed at a meeting may be made available to other Consulted Persons.

Further Information

A Consultation Paper is attached to the AEMO Communication issuing this Notice of First Stage of Rules Consultation.

Contact Details

AEMO prefers that submissions be forwarded in electronic format (both pdf and Word) as they will be published on the AEMO website.

Please send all e-mail submissions to Ben Blake at ben.blake@aemo.com.au.

Alternatively, you may post submissions to:

Ben Blake

Manager Electricity Constraints, Electricity System Operations Planning & Performance

AEMO

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