

MEETING OUTCOMES – AEMO Procedure Change Working Group (WEM)

MEETING: AEMO Procedure Change Working Group (WEM) Meeting 6
DATE: Friday, 13 July 2018
TIME: 12.30pm – 1.30pm (AWST)
LOCATION: AEMO Perth Karinjini/Nambung/Ningaloo Rooms, Melbourne Orchid Room, Sydney Board Room

ATTENDEES:

NAME	COMPANY
Matthew Fairclough	AEMO
Nicole Markham	AEMO
Nicky Hong	AEMO
Marcus Arundale	AEMO
Vinay Chandrasekaran	AEMO
Mark Riley (VC)	AGL
Jacinda Papps	Alinta Energy
Nadine Pizarra (VC)	Alinta Energy
Sam Lei	Alinta Energy
Gerrymaine Amoc	Bluewaters
Wendy Ng	ERM Power
Mark Hettler	Perth Energy
Jenny Laidlaw	Rule Change Panel
Brad Huppatz	Synergy
Bryce Powdrill	Synergy
Dean Frost	Western Power
Kei Sukmadjaja	Western Power
Rudy James	Western Power

1. Welcome

2. Procedure Change Proposal for Power System Operation Procedure: Facility Outages

Comments made at the meeting:

- Numerous editorial variations were indicated. AEMO has included these in a separate marked-up version of the draft Procedure.
- Step 4.2.4: The Interpretation Act may prevent the Procedure referring to a Supreme Court judgement.

Questions and responses:

- Question – Step 1.1.1: Other WEM Rules relate to Planned Outage Rates and Forced Outage Rates other than clause 4.11.1(h) such as Equivalent Planned Outage Hours. Should these be included?
Answer – Clause 4.11.1(h) indicates the head of power for Planned Outages Rates and Forced Outages Rates and appears to be the only relevant clause. However, AEMO will amend step 11.1.1 of the Procedure to refer to Equivalent Planned Outage Hours.
- Question – Step 2.1.2(c): Is the wording “generation systems” appropriate in this context?
Answer – AEMO will clarify the wording in the Procedure to reflect the WEM Rules.
- Question – Step 2.1.3: Is this step a clarification or guidance of step 2.1.2(e)? Should there be a subclause for network equipment?

Answer – This step provides guidance. It has been included separate to step 2.1.2 as clause 3.18.2(c) of the Wholesale Electricity Market Rules (WEM Rules) does not include this guidance. AEMO will revise the step to include network equipment and will reconsider the inclusion of loads.

- Question – Step 2.1.5: Can AEMO provide a specific timeframe for revision of the Equipment List?

Answer – Clause 3.18.2(b) of the WEM Rules does not specify a timeframe, AEMO will endeavour to update the Equipment List, when required, and publish the updated Equipment list as soon as practicable. AEMO will amend the Procedure to review the Equipment List at least once every 6 months.

- Question – Step 2.1: Can AEMO include details relating to clause 3.18.2(f)?

Answer – AEMO will include a new step.

- Question – Steps 2.1.6 and 2.1.7: Is this an appropriate place for these steps? Should these steps also apply to the Network Operator? Following a Planned Outage, when should AEMO be notified of commencement and restoration of a Facility?

Answer – AEMO has investigated these steps. An Operating Agreement for commencement and return-to-service is essential for network equipment but not for other Facilities. AEMO will revise step 2.1.6 to refer only to Network Operators and will remove step 2.1.7.

- Question – Step 2.1: Can AEMO reinstate step 3.2.2 (factors to consider to whether to include or exclude a piece of equipment on the list) from the current Procedure?

Answer – AEMO will reinstate this step.

- Question – Step 3.1.1: Can AEMO provide direction as to where Participants can find information in regards to AEMO's nominated IT system?

Answer – AEMO will publish this information on the Market Web Site. AEMO will amend the step to refer to the Market Web Site.

- Question – Step 4.2.3(a): Can AEMO provide any guidance as to what is required and how this is assessed?

Answer – AEMO will publish a user guide on the Market Web Site outlining the information that should be provided in Outage Risk Assessments and how AEMO assesses this information, which will not form part of the Procedure. AEMO will consider what guidance can be provided in the Procedure but does not intend to refer to the user guide.

- Question – Step 4.2.5: It is difficult for Market Participants to provide detail in a recall plan when specific details can only be ascertained when conducting the corresponding Planned Outage. Can AEMO specify the details that are required? How is this information used? Should this information be updated in real-time? Should this step refer to step 4.2.3?

Answer – AEMO will consider what guidance can be provided in the Procedure and will publish a user guide on the Market Web Site outlining the information that should be provided in Outage Contingency Plans and how AEMO assesses this information, which will not form part of the Procedure. AEMO will modify the wording in the Procedure to refer to step 4.2.3.

AEMO will confirm the need for any update to Outage Contingency Plans, but these are generally only required as requested by AEMO.

- Question – Step 4.2.8(b): Is this timeframe reasonable?

Answer – AEMO has investigated the timeframe and considers it reasonable as network outages that impact other Market Participants will take further time to assess.

- Question – Step 4.3.2: Can AEMO clarify the term “urgent” in this context?

Answer – This step relates to an outage which was unable to be scheduled 6 weeks prior to commencement. AEMO will reconsider the wording in this step.

- Question – Step 4.4.2: Can AEMO clarify the term “unduly” in this context? In this context, does the wording “not in accordance” imply Out of Merit dispatch? Does this step only apply to Forced and Consequential Outages?

Answer – The term “unduly” relates to WEM Rule 3.18.5C. To clarify AEMO will reorder steps 4.4.2 and 4.4.3. In general, AEMO considers that a Facility is unduly impacted by a network outage when

this Facility cannot dispatch to its full capacity in accordance with its Standing Data, as a consequence of the network outage.

- Question – Step 4.4.3: Should this step be an imperative on AEMO, rather than be at AEMO’s discretion?

Answer – The wording this step reflects clause 3.18.5C of the WEM Rules. There may be times where it is not possible or appropriate for coordination to be required.

- Question – Step 5.1.2: Are the changes in this step only for extending an outage?

Answer – This step reflects WEM Rule 3.18.9 which covers any change to the timing of an outage.

- Question – Step 5.1.3: Can AEMO clarify the changes for which this step applies?

Answer – AEMO will confirm, but in general AEMO must be notified when the Market Participant or Network Operator expects a delay in the commencement of the Planned Outage.

- Question – Step 6.1.5: Can AEMO clarify the term “ongoing” in this context? Can this be linked to ST or MT PASA?

Answer – AEMO conducts assessment of all Outage Plans on an ongoing basis to account for changing power system conditions as indicated in the processes for MT and ST PASA. AEMO will clarify the step to reflect this.

- Question – Step 6.1.6: What liaison or notification does AEMO provide for changes in outage status? Can the requirement to re-negotiate (WEM Rule 3.18.13(d)) be included?

Answer – Any change to status is automatically notified to the relevant Participant via the IT system and email. AEMO will include the requirements of WEM Rule 3.18.13(d) in this step.

- Question – Step 6.2.1: Should this step refer to outages or Outage Plans? Is this step circular because AEMO needs to assess the outage before it has been determined to be valid?

- Answer – AEMO will amend the step to refer to “outages” as per WEM Rule 3.18.11(e). The step is not circular as it refers to the outcome of the assessment, at which point AEMO will have already identified that the Outage Plan is valid.

- Question – Step 6.2.2: Should materiality be a factor in AEMO’s decision?

Answer – Step 6.2.2(a) indicates impact on Power System Security or Reliability which by definition is material.

- Question – Step 6.2.3: For Network Operator outages, should safety and reliability be factors that AEMO must consider?

Answer – AEMO has reviewed this step and believes safety matters are covered by part (b) and reliability matters by part (a).

- Question – Step 6.3.2: What is the process if AEMO does not agree with a Market Participant’s amendments to an Outage Contingency Plan of a Scheduled Outage?

Answer – AEMO will confirm, however an amendment to an Outage Contingency Plan may invalidate the assumptions under which the original Outage Plan was assessed. AEMO will assess the extent to which the Scheduled Outage and power system conditions may be affected by the amendments to the Outage Contingency Plan. Where AEMO does not agree with an amendment, AEMO will seek to resolve this disagreement with the Market Participant. Where this cannot be resolved, AEMO may require a new Outage Plan be submitted.

- Question – Step 7.1.1: Is Opportunistic Maintenance a request for an outage, or an outage?

Answer – WEM Rule 3.19.2 appears to indicate that Opportunistic Maintenance is a request for an outage, similar to WEM Rule 3.18.4A. Where this request is approved, it becomes a Planned Outage. AEMO will seek to clarify the wording.

- Question – Step 7.1.4: What other criteria may AEMO require? How does this apply to network equipment?

Answer – AEMO has reconsidered step 7.1.4 and will apply the content in the context of a request for Opportunistic Maintenance that has been made principally to avoid exposure to Capacity Cost Refunds rather than to perform maintenance (as indicated in step 7.2.1).

- Question – Step 7.4.1: Can AEMO clarify the practicality of the timing of On the Day Opportunistic Maintenance requests?
Answer – AEMO will provide a guideline to clarify AEMO's understanding of the appropriate timeframe as indicated in the WEM Rules.
- Question – Step 7.4.1: What is the audit trail for the telephone requests? What does “practicable” mean?
Answer – All requests are logged by AEMO to allow for an appropriate audit trail. The definition of “practicable” will depend on circumstances; AEMO may provide further guidance regarding compliance matters, but does not intend to specify timeframes in the Procedure.
- Question – Step 7.4.3: What type of testing would otherwise not require a Commissioning Test Plan?
Answer – This relates to any test that does not follow “significant maintenance”, and therefore cannot form part of a Commissioning Test Plan.
- Question – Step 7.4.4(a)(1): Can AEMO clarify the wording “full availability for dispatch”?
Answer – AEMO will reword the step to refer to an outage that would otherwise constrain the Facility's declared availability.
- Question – Section 8.1: Can AEMO clarify whether it will assess and approve a Scheduled Outage or Opportunistic Maintenance as soon possible?
Answer – AEMO will confirm this position. If AEMO is able to make best endeavours to approve a Scheduled Outage or Opportunistic Maintenance as soon practicable, AEMO will modify the wording in the Procedure accordingly.
- Question – Steps 8.1.5 and 8.1.6: Should AEMO provide verbal confirmation of approval or rejection, prior to entering this outcome in its IT system? Can AEMO provide Participants with guidelines outlining AEMO's approvals process in regards to Scheduled Outages and Opportunistic Maintenance?
Answer – AEMO may provide verbal confirmation to the Market Participant or Network Operator its decision to approve or reject a Scheduled Outage or Opportunistic Maintenance, prior to entering this outcome in its IT system. AEMO will assess whether the Opportunistic Maintenance approval timeframes specified in step 10.2.3 of the current Procedure remain relevant.
AEMO will investigate whether a guideline is appropriate.
- Question – Section 9.1.2(b): Should a change in weather forecast also apply to Opportunistic Maintenance?
Answer – AEMO will revise the step accordingly.
- Question – Step 9.1.3: Is the order in part (b) correct? Is an outage in part (d) less important than an outage in part (c)?
Answer – AEMO will investigate for conformance with the WEM Rules.
- Question – Step 10.1: Can the Procedure include details about conversion of Forced Outages to Consequential?
Answer – AEMO will include these details.
- Question – Step 11.1.1: Other WEM Rules relate to Planned Outage Rates and Forced Outage Rates other than clause 4.11.1(h), such as Equivalent Planned Outage Hours. Should these be included?
Answer – Clause 4.11.1(h) appears to be the only relevant clause. However, AEMO will amend step 11.1.1 of the Procedure to refer to Equivalent Planned Outage Hours.
- Question – Appendix A and B: There are issues with the calculations. Can these be rectified?
Answer – Participants are requested to provide further details of any concerns.
- Question – Can the process of rescheduling be included?
Answer – AEMO will investigate what details can be included in the Procedure.

3. Next meeting

Stakeholders will be advised of the date for the next workshop.