

Your ref:
Our ref:

1 September 2017

Rob Jackson
Principal Analyst
Systems Performance and Commercial Operations
Australian Energy Market Operator (AEMO)
Melbourne

Dear Rob

re: Draft Power System Frequency Risk Review (PSFRR)

ElectraNet welcomes the opportunity to make this submission on the draft PSFRR published by AEMO. We note that this is the first PSFRR following the Emergency Frequency Control Scheme (EFCS) Rule change earlier in 2017 and also that ElectraNet and AEMO have been working closely together to develop an interim EFCS¹ to manage the loss of multiple generation in South Australia and to prevent a consequential islanding from the rest of the National Electricity Market (NEM).

ElectraNet has reviewed the draft PSFRR report recently issued by AEMO under the new Rules governing emergency frequency control schemes. ElectraNet's understanding of the Rules is that AEMO's clear responsibilities in relation to power system security and emergency frequency control schemes is to:

- Coordinate the provision of emergency frequency control schemes by NSPs and determine the settings and intended sequence of response by those schemes – Clause 4.3.1 (pa) of the NER
- Develop, update and maintain (among other things) schedules for each participating jurisdiction specifying, for each emergency frequency control scheme for each region in that participating jurisdiction, settings for operation of the scheme ('EFCS settings schedule') – Clause 4.3.2 (h)(2) of the NER.

¹ AEMO's final report "Black System South Australia 28 September 2016" (March 2017), makes the following Recommendation 6: "In consultation with ElectraNet, AEMO to investigate the feasibility of developing a Special Protection Scheme (SPS) that would detect sudden excessive flows on the Heywood Interconnector, Power Oscillations or serious events within SA and initiate, if necessary, load shedding or generation response with a response time fast enough to prevent separation."

In developing and updating EFCS settings schedules, AEMO must consult with:

- Affected Network Service Providers
- The relevant jurisdictional system security coordinator in the case of information in the schedule relating to an under frequency scheme (re over frequency schemes AEMO must consult with generators)

There are then requirements AEMO needs to consider in relation to sensitive loads.

ElectraNet recommends that the PSFRR be updated to make it clear that AEMO is responsible for the EFCS setting schedules. AEMO may also consider whether to incorporate the other above comments in the PSFRR report.

ElectraNet remains committed to working closely with AEMO to develop and implement an interim EFCS in South Australia as soon as possible.

Yours sincerely



Hugo Klingenberg
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