

18 November 2019



Ms Audrey Zibelman
Chief Executive Officer and Managing Director
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

By email to LBSP.consultation@aemo.com.au

Dear Ms Zibelman

Guidelines for preparing Local Black System Procedures

Ergon Energy Corporation Limited (Ergon Energy) and Energex Limited (Energex) welcome the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the second stage of consultation on the proposed amendments to the Guidelines for Preparing Local Black System Procedures (the Procedures) under clause 4.8.12(e) of the National Electricity Rules.

Ergon Energy and Energex are largely supportive of the Procedures as proposed by AEMO. However, we make the following two comments:

- Clause 3.2 (b) of the Procedures provides “*the Network Service Provider (NSP) Local Black System Procedures (LBSPs) must summarise internal switching procedures followed by NSP operations staff following major supply disruptions and include, as an attachment, the detailed switching sequences*”.

It is our view that detailed switching sequences are rarely produced as part of prepared contingency plans as contingency actions are dependent on the status of the network following the event. Ergon Energy and Energex therefore recommend that this clause be amended to reflect ‘proposed switching sequences’ rather than ‘detailed switching sequences’. It is critical for NSPs to keep the switching sequence as proposed due to the increasing volume of embedded renewable generation and the variability of renewable availability.

- Clause 3.2 (d) of the Procedures provides “*NSPs are required to complete and submit a LBSP for each network (including a transmission network, distribution network or separate DC Link) that they own, operate or control. NSPs must submit LBSPs to AEMO electronically by emailing to the following email address: system_restart_advice@AEMO.com.au.*”

Ergon Energy and Energex recommend that a timeframe for the submission of an LBSP be incorporated within this clause.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact me on [REDACTED].

Yours sincerely

