

20/09/2019

LBSP.consultation@AEMO

Consultation on Guideline for Preparing Local Black System Procedures

I refer to your consultation notice published on 13 August 2019 with respect to Local Black System Procedures (LBSP) and provide the following advice.

Referencing Existing Documentation

The structure of our system of Operating Manuals (OM) means that much of the information you are seeking is already recorded in a controlled document provided to AEMO. In the interest of having a single source of information, our Local Black System Procedure will use referencing to the relevant OM.

AEMO will therefore have to ensure that it updates its procedures in response to all OM updates that are referenced in the TransGrid LBSP.

Routine Testing

In Section 4: Continuity of NSP Supervisory Systems (monitoring and control), under item 4B AEMO is seeking information regarding routine testing arrangements.

The stated objective of the LBSP is provide an information source for AEMO to understand the likely condition and capabilities following a supply disruption. TransGrid considers routine testing arrangements as an Asset Management function and does not see that it is relevant to meeting the LBSP objective.

TransGrid's view is that item 4B should be removed from the guideline.

NER Interpretations

TransGrid notes that since the AER published its report in December 2018 on the South Australia System Black event there has been inconsistent interpretations of the National Electricity Rules that need to be resolved. The AEMC has recently issued a Consultation Paper¹ on proposed amendments to the NER in response to rule change requests from AEMO and the AER. The consultation paper clearly identifies the role and function of Local Black Start Procedures (LBSPs) is an area where AEMO and the AER have different interpretations.

Our view is that this impasse on interpretations creates a significant risk which can be effectively mitigated by reaching NEM wide agreement on the interpretation. The market bodies should take the lead in resolving this matter noting that TransGrid is a happy to participate in any consultation.

Resolution of this issue should proceed any finalisation of the LBSP Guideline.

¹ AEMC, Consultation Paper System Restart Services, Standards and Test, 19 September 2019

I trust this information is of assistance. Should you have any questions or require further clarifications I can be contacted on [REDACTED]

Yours faithfully

