

AEMO Data Communication Standards Review Team
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(Lodged electronically via Data.Comms@AEMO.com.au)

7 October 2022

**REVIEW OF (AEMOs) POWER SYSTEM DATA COMMUNICATION STANDARD
DRAFT DETERMINATION – SECOND CONSULTATION PERIOD
Date of Notice: 07/09/2022**

Delta Electricity operates the Vales Point Power Station located at the southern end of Lake Macquarie in NSW. The power station consists of two 660MW conventional coal-fired steam turbogenerators.

Delta Electricity appreciates the opportunity to comment on AEMO's Draft Determination of the revised Standard.

The data communication standard has undergone an extensive revision in this review and appears to have moved towards greater clarity of both purpose and explanation of details.

Delta Electricity looks forward to further consideration, perhaps before final determination, or else in a future review to further advance fault management coordination. It is particularly obvious with the onset of "cloud" based infrastructure and from experience with dysfunction, both recent and in the past, that determining the location and ownership of faulted components is problematic, without which, motivating and funding technical investigation teams is challenged.

Design limitations may also exist that make the identification of the faulted equipment difficult. As an example, a "watchdog" is included in dispatch data at some power stations and is relied upon to check data integrity whilst connected intervening facilities are understood to not be required to use or rely on such a signal for condition monitoring. Watchdog signals at the power stations have in the past been detected interrupted even when dispatch data has been unaffected. The opposite condition has also occurred where dispatch data has been dysfunctional and the watchdog intact. This could be considered an example of dysfunctional design. A more effective centrally designed watchdog system could drive improved data communications performance.

It is considered theoretically feasible that appropriate "watchdog" designs carried through from participants to AEMO and mandatorily utilised by intervening facilities could be used to produce automated availability information, more efficiently confirming performance against the Standard's objectives in real time, more effectively pinpointing location of fault and more rapidly driving repair efforts. It is not considered that "cloud"-based transfers without the ability to clearly identify, locate or assign fault ownership can ever drive best-practice performance. A design change may be required but the Standard may also need to better describe the design required or, if the Standard is not meant to be such a document, a Rule change may be required.

Delta Electricity has also experienced dysfunction related to a lack of communication transparency and understanding between technical personnel of AEMO and participants about the settings of the AEMO's Automatic Generator Controller (AGC) and the dispatch of generating units, data for which is discussed in the Data Communication Standard. This



dysfunction has recently been found to be due to a long-lived AGC setting. It is understood that the AGC may not be equipment meant for inclusion in the Data Communication Standard. Delta Electricity suggests, however, that dispatch accuracy and understanding could be improved via a document, like the Data Communication Standard, produced and consulted upon, and which describes the expectations of the AGC and its control process. It could be that a publicly consulted document and review process already exists for the AGC. If this is the case, Delta Electricity is eager to connect with the relevant AEMO team at the next AGC review or otherwise at any convenient time.

If AEMO wishes to discuss matters raised in this letter, please contact Simon Bolt on (02) 4352 6315 or simon.bolt@de.com.au.

Yours sincerely

A handwritten signature in blue ink that reads "Simon Bolt". The signature is fluid and cursive.

Simon Bolt
Marketing/Technical Compliance