

7 October 2022

Australian Energy Market Operator

Submitted by email to: Data.comms@aemo.com.au

Dear Sir/Madam

RE Review of Power System Data Communication Standard

TasNetworks is appreciative of the opportunity to respond to the Australian Energy Market Operator's (**AEMO's**) Review of Power System Data Communication Standard (**the Standard**) second stage consultation.

TasNetworks is the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner (**JP**) in Tasmania. TasNetworks is also the proponent behind Marinus Link, a new interconnector between Tasmania and Victoria. The focus in all of these roles is to deliver safe and reliable electricity network services to Tasmanian and National Electricity Market (**NEM**) customers at the lowest sustainable prices. TasNetworks is therefore appreciative of the AEMO's efforts to review and update the Standard.

The proposed Standard has expanded the requirements of section 4 (Security). The Standard as drafted does not provide either time frames or acceptable transition mechanisms to address the increased requirements of the Standard. Application of section 4.4.2 of the Standard will require upgrades to communication infrastructure as well as both remote monitoring equipment (**RME**) and remote control equipment (**RCE**) within the network. To reduce the risk of inefficient investment in existing equipment it is requested that grandfathering of existing site capabilities be included in the Standard. This will allow networks to find efficiencies by combining upgrades with other works and to reduce the impact of increased costs on customers.

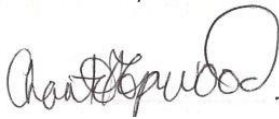
The implementation of IEC 62351 as a requirement in section 4.4.2 increases the complexity of the communication mechanisms required by the Standard. This complexity not only increases costs from an equipment and management perspective, but also has the potential to reduce reliability if not adequately implemented or managed. Additionally, centralised network wide protection and control schemes are requiring ever decreasing times in which to operate. Encryption can add serialisation delays and overheads impacting the implementation of these critical schemes. TasNetworks requests AEMO consider the cost implications on

networks and other parties of having to comply with both performance and security obligations.

Lastly, it is unclear for data provided under this Standard by a TNSP, but sourced via a third party, if the TNSP has the obligation or a mechanism to enforce the requirements of section 4 of the draft Standard. Although it is likely these requirements can be managed by the connections process for new participants, the expectations for existing participants is unclear.

Should you have any questions or would like to discuss any aspects of this submission further, please contact Tim Astley, Network Reform and Regulatory Compliance Team Leader by email on tim.astley@tasnetworks.com.au.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Chantal Hopwood', with a large, stylized flourish at the end.

Chantal Hopwood

Head of Regulation