

WHOLESALE ELECTRICITY MARKET

PROCEDURE CHANGE REPORT: AEPC_2018_05

MARKET PROCEDURE: IMS INTERFACE

Published: **June 2019**





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EXECUTIVE SUMMARY

Purpose

The publication of this Procedure Change Report and accompanying Market Procedure completes the Procedure Change Process conducted by AEMO to consider a proposed revised Market Procedure: IMS Interface (Procedure) under the Wholesale Electricity Market Rules (WEM Rules).

Proposed amendments

The proposed revised Market Procedure is required by clause 2.36A.1 of the WEM Rules, which requires AEMO to develop a IMS Interface Market Procedure prescribing the reasonable arrangement by which Network Operators and AEMO must provide each other with information under WEM Rules. The proposed amendments relocate content to the Power System Operation Procedure: Communications and Control Systems, and therefore the two Procedures must commence simultaneously.

Consultation

A draft version of the Market Procedure was presented at the AEMO WEM Procedure Change workshop held on 19 February 2018. No comments were made by stakeholders.

AEMO published the Procedure Change Proposal (AEPC_2018_05) on the Market Web Site and issued a notice calling for submissions from stakeholders on 20 April 2018.

The submission period closed on 21 May 2018, with a submission received from Western Power. Western Power generally supported the Procedure Change Proposal, with specific issues raised. AEMO has responded to all matters identified.

Following the consultation period, and in line with negotiations between AEMO and Western Power regarding the separation of IT systems, AEMO engaged with Western Power to restructure the Procedure. This restructure did not introduce any material content and therefore did not require further consultation.

AEMO's decision

AEMO's decision is to accept the Procedure as amended following consultation. AEMO considers that the revised Procedure is consistent with the Wholesale Market Objectives, the *Electricity Industry Act*, the *Electricity Industry (Wholesale Electricity Market) Regulations 2004*, and the WEM Rules.

Next steps

The revised Market Procedure: IMS Interface will commence at 8:00 am on 15 June 2019, concurrently with the Power System Operation Procedure: Communications and Control Systems.



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1. BACKGROUND

1.1. Regulatory requirements

Clause 2.36A.1 of the WEM Rules provides that:

2.36A.1. System Management must develop an IMS Interface Market Procedure prescribing the reasonable arrangement by which Network Operators and AEMO must, subject to clause 2.36A.2, provide each other with information under these Market Rules, including—

- (a) the format, form and manner in which that information must be provided; and*
- (b) where the Market Rules do not provide a timeframe for the provision of the information, the time by which such information must be provided.*

1.2. Context for this consultation

As part of the amalgamation of System Management and AEMO, the Power System Operation Procedures are being revised and updated. In general, AEMO is revising the Market Procedures to:

- (a) remove any Power System Operation Procedures not required by WEM Rules;
- (b) update all Power System Operation Procedures to current AEMO standards;
- (c) ensure Power System Operation Procedures comply with obligations; and
- (d) ensure content in Market Procedures is included where a WEM Rule requirement exists to include detail or process or AEMO requires an obligation on itself or Participants.

The Power System Operation Procedure will be the second version of this Procedure. AEMO proposes to commence the revised Procedure on 15 June 2019.

1.3. Procedure Change Process and timetable

On 20 April 2018, AEMO published a Procedure Change Proposal (AEPC_2018_05) for the Market Procedure: IMS Procedure and issued a call for submissions, which are available at http://www.aemo.com.au/Stakeholder-Consultation/Consultations/AEPC_2018_05.

The proposal was progressed using the Procedure Change Process specified in clause 2.10 of the WEM Rules, with submissions required by 21 May 2018.

2. PROPOSED PROCEDURE CHANGE

This section details the changes that AEMO proposed when the call for submissions was published.

2.1. Detail of the proposed procedure change

The variations to this Procedure arise from:

- sections which have been removed from the Procedure and transferred to the Power System Operation Procedure: Communications and Control Systems; and
- minor editorials.

2.2. Proposed drafting

AEMO has published a draft of the proposed Market Procedure: IMS Procedure for consultation, which is available at: http://www.aemo.com.au/Stakeholder-Consultation/Consultations/AEPC_2018_05. AEMO has also provided a marked-up version of the revised Procedure.



3. CONSULTATION PROCESS

3.1. Market Advisory Committee or Working Group

The Market Advisory Committee (MAC) has delegated its advisory role with respect to AEMO Procedure Change Proposals to the AEMO Procedure Change Working Group (APCWG), in accordance with clause 2.3.17(a) of the WEM Rules. Accordingly, the MAC did not review the Procedure Change Proposal.

A draft version of the Market Procedure was presented at the AEMO WEM Procedure Change workshop held on 19 February 2018. No comments were made by stakeholders. Details of this forum are available at: <http://aemo.com.au/Stakeholder-Consultation/Industry-forums-and-working-groups/WA-Forums>.

3.2. Public workshop

No public workshops were held in relation to this Procedure Change Proposal.

3.3. Submissions received during consultation period

AEMO published the Procedure Change Proposal (AEPC_2018_05) on the Market Web Site and issued a notice calling for submissions from stakeholders on 20 April 2018.

The submission period closed on 21 May 2018, with a submission received from Western Power. Western Power generally supported the Procedure Change Proposal but raised specific issues. AEMO has responded to all matters identified.

Copies of submissions received during the submission period are available at: http://www.aemo.com.au/Stakeholder-Consultation/Consultations/AEPC_2018_05.

3.3.1. Specific comments and AEMO's responses

Transmission network and connection point modelling data and transmission network connection point topology

Western Power considered that:

- the manner AEMO accesses Western Power's Power System Model, as set out in Table 3 of the Market Procedure, is only applicable for the duration of the current Services Agreement; and
- upon the expiry of the Services Agreement, the manner that AEMO accesses Western Power's Power System Model will no longer be applicable and the Market Procedure will need to be amended.

AEMO's response

AEMO agrees that certain aspects of information access will change at the end of the Services Agreement. For example, AEMO will no longer have access to Western Power's EMS or GIS. In its place, AEMO will interface with Western Power's systems via an ICCP link. However, Table 3 indicates the model must be uploaded into AEMO's website, and other data must be emailed periodically, which will not change.

Historical SCADA data

To provide clarity on the retention period of SCADA data, Western Power considers that AEMO should specify the time period that 'historical' refers to in Table 3 of the Market Procedure.

AEMO's response

AEMO will amend the Procedure to clarify that this information must be only retained for seven years, as specified in WEM Rule 10.1.2.



Operational telephones

Western Power considers that:

- it will only provide access or connection to its operational voice systems to the extent that it relates to System Management;
- it will not be able to provide access or connection to its operational voice systems relating to its field or control room conversations; and
- it should not be obliged to provide AEMO with access to its historical telephone records as they contain confidential information that is only accessible to Western Power employees.

AEMO's response

The WEM Rules limit AEMO's functions and powers. As such, AEMO requires access to Western Power's operational telephone system and historical records for, and only for:

- (a) any communications between Western Power and AEMO controls rooms,
- (b) communications between AEMO and Rule Participants.

AEMO will amend the Procedure to clarify these limitations.

Provision of data on expiry of services agreement

Western Power considers that:

- the obligations under sections 2.3.1 and 2.3.2 of the Market Procedure, regarding provision of data on expiry of services agreement, go beyond Western Power's obligations as a Network Operator under the WEM Rules and, as such, Western Power is not required to provide these services under the WEM Rules and the Market Procedure;
- should AEMO require Western Power to carry out these obligations upon the expiry of the current Services Agreement, AEMO and Western Power will need to enter into commercial discussions regarding the provision of these services and outline any arrangements in a separate services agreement.

AEMO's response

The Services Agreement between AEMO and Western Power covers Western Power providing AEMO access to services, such as IT systems. It does not cover data required. The data requirements are specified in the WEM Rules and Procedures. However, AEMO agrees that the format of the Procedure does not sufficiently describe the requirements prior to, and following the expiry of, the Services Agreement, and will amend the Procedure accordingly.

3.4. Further consultation with Western Power

Following the consultation period, and in line with negotiations regarding the Services Agreement, AEMO engaged with Western Power in order to reformat the Procedure to more clearly delineate requirements prior to, and following the expiry of, the Services Agreement. As a result of this, AEMO:

- modified Table 3 of the Procedure to only refer to enduring requirements;
- removed a table containing Additional System Details and created a table containing Transitional System Details;
- introduced further clarification regarding transitional details; and
- made multiple editorials and clarifications throughout the Procedure.



While none of the above changes varied the underlying requirements, and therefore did not require a further round of stakeholder consultation, for transparency, AEMO has published a version of the Procedure showing the changes from the initial consultation.

4. AEMO'S ASSESSMENT

4.1. Further changes to the Procedure

AEMO made minor editorial changes to the Procedure following the engagement with Wester Power. These changes have been published for transparency.

4.2. Consistency with Electricity Industry Act, WEM Regulations, and WEM Rules

The revised Procedure has been reviewed as a whole by AEMO to ensure compliance with the relevant provisions in the:

- *Electricity Industry Act 2004*.
- *Electricity Industry (Wholesale Electricity Market) Regulations 2004* (WEM Regulations).
- WEM Rules.

4.3. Consistency with Wholesale Market Objectives

AEMO considers that the steps are drafted in a way that is consistent with the objectives of the WEM Rules. As a result, AEMO considers that the revised Procedure, as a whole, is consistent with the Wholesale Market Objectives.

4.4. Implementation of the Procedure

The Procedure was developed in accordance with clause 2.36A.1 of the WEM Rules, and must commence concurrently with the Power System Operation Procedure: Communications and Control Systems.

This Procedure does not require system changes by AEMO.

The Procedure will not require Rule Participants to implement any procedural or system amendments before commencement.

Consequently, AEMO considers that commencement at 8:00 am on 15 June 2019 will allow Rule Participants sufficient time from the date of publication of this Procedure Change Report to ensure compliance.

4.5. AEMO's decision and commencement

AEMO's decision is to accept the Procedure as amended following consultation. The revised Market Procedure: IMS Procedure will commence at 8:00 am on 15 June 2019.

AEMO has made this decision on the basis that the new Procedure:

- Is consistent with the Wholesale Market Objectives.
- Is consistent with the Electricity Industry Act, WEM Regulations, and WEM Rules.
- Has the general support of submissions received during the consultation period.

Clean and tracked-changed versions of the revised Market Procedure: IMS Procedure are available at: http://www.aemo.com.au/Stakeholder-Consultation/Consultations/AEPC_2018_05.