

WHOLESALE ELECTRICITY MARKET

Submission to Procedure Change Proposal

AEPC_2019_10
Facility Outages

Submitted by	
Name:	Andrew Everett
Phone:	0417 978 890
Fax:	
Email:	Andrew.everett@synergy.net.au
Organisation:	Synergy
Address:	219 St Georges Terrace, Perth 6000
Date submitted:	20 January 2020

Submission

Clause 2.10.7 of the Wholesale Electricity Market Rules provides that any person may make a submission for a Procedure Change Proposal (including proposals developed by AEMO, the Economic Regulation Authority or the Rule Change Panel) by completing this Procedure Change Submission form.

Submissions should be provided by email to the nominated contact in the call for submissions published with the Procedure Change Proposal.

Please provide your views on the Procedure Change Proposal, including any objections or suggested revisions

Synergy welcomes the opportunity to provide feedback to the *Call for Submissions: Power System Operation Procedure: Facility Outages (Procedure) (AEPC_2019_10)*.

Considerations:

Synergy requests that AEMO consider the following issues:

- (a) Step 2.1.6:** Synergy is unclear as to whether there are processes in place for AEMO to inform Market Participants and Network Operators should changes to the Equipment List come into effect. If not, Synergy suggests that an automated IT solution to inform Market Participants and Network Operators be in place post the implementation of System Management Systems Transition (SMST). This would minimise unnecessary exposure to non-compliance to the WEM Rules;
- (b) Step 2.1.8:** Prior to AEMO publishing a revised Equipment List on the Market Web Site, Synergy requests Market Participants and Network Operators who will be impacted by the changes be reasonably informed in advance. This would prevent inadvertent breaches occurring due to new requirements to which Facilities or Equipment are now subject to;
- (c) Step 2.1.9:** During the period in which a Market Participant or Network Operator requests that the Economic Regulation Authority (ERA) reassesses the inclusion of its Facility or an item of equipment on the Equipment List, Synergy seeks clarification as to whether this Facility or item of equipment is expected to comply with the Outage Rules; and
- (d) Step 7.1.10/3.1.3:** Step 7.1.10 states that a Planned Outage must not be commenced unless AEMO has confirmed its approval of the outage request via its IT system. However, should AEMO's IT system be unavailable, there is no defined process in Step 3.1 that details how Rule Participants will obtain notification of its approval.

Administrative changes:

1) Notation of time:

- a. Synergy notes that the notation for time is inconsistent throughout the procedure. For instance,
 - i. Step 6.1.1 uses "10 am";
 - ii. Step 6.1.2(a) uses "10:00 am"; and
 - iii. Step 7.1.1 uses 10:00 AM.
- b. Synergy suggests that the notation for time follows the following format: 10:00 AM and that changes be made to steps 6.1.1, 6.1.2, 7.1.7 and 7.1.8.

2) Edge cases:

- a. The procedure neglects to ascertain which action to adopt during edge cases. For instance, under step 6.1.1, if a request for Opportunistic Maintenance was submitted at exactly 10:00 AM, it is unclear as to whether the Market Participant or Network Operator is required to just submit the request via AEMO's IT system

or whether they also need to contact AEMO by phone. Clarification within the WEM Rules is sought.

- b. Synergy suggests that where there are edge cases, the procedure clarifies which actions should be adopted. For instance, step 6.1.1 could be rephrased as follows:
 - i. (a) for a request made on or before 10:00 AM on the Scheduling Day, submit the request via AEMO's IT system; or
 - ii. (b) for a request made after 10:00 AM on the Scheduling Day, contact AEMO by phone and submit the request via AEMO's IT system.
- c. It is recommended that these changes apply to steps 6.1.1, 7.1.7 and 7.1.8.

3) Exclusions:

- a. Synergy notes the inconsistency in referencing exceptions. Synergy suggests that a consistent approach be adopted:
 - i. **Step 7.1.2:** Reference to clause 3.19.2G of the WEM Rules is irrelevant as clause 3.19.3B is already subject to this clause; and
 - ii. **Step 4.2.4:** Reference to clause 3.18.5E of the WEM Rules is irrelevant as clause 3.18.5D is already subject to this clause. However, if this has been included as a point of clarify, step 4.2.4 should also reference clause 3.19.2G for consistency with the WEM Rules.

4) Administrative changes:

- a. Synergy suggests the following minor revisions:
 - i. **Step 5.3.1:** AEMO's IT's system;
 - ii. **Step 7.1.5:** Procedure should be subject to clause 3.19.3C in accordance with approved changes to clause 3.19.4 of the WEM Rules; and
 - iii. **Step 5.3.2:** To rectify an error, this should be subject to clause 3.18.9A.

Please provide an assessment whether the Procedure Change Proposal is consistent with the Market Objectives and the Wholesale Electricity Market Rules.

If the recommended administrative changes are adopted, Synergy broadly considers the Procedure will better facilitate the achievement of the Wholesale Market Objectives.

However, Synergy considers that the Wholesale Market Objectives may be better serviced by addressing the issues raised above in relation to adequate and timely consultation with respect to updates to the Equipment List as well as clarification within the Procedure during instances where AEMO's IT system is unavailable.

Please indicate if the Procedure Change Proposal will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.

The proposed changes will have both IT and business process implications for Synergy.

Further to this, the proposal will require Synergy to undertake specific outage training for all its traders and relevant site staff.

Please indicate the time required for your organisation to implement the changes, should they be accepted as proposed.

Synergy understands that AEMO has indicated a commencement date of 1 February 2020. Given the current focus on the reform changes and transition to Facility-based bidding, Synergy considers that interim solutions will be initially deployed with full IT solutions to be implemented within 6 months.

Synergy will also focus on compliance and outage training for trading and relevant site staff which Synergy expects will take a few months to complete due to locational differences and availability of staff.