

28 November 2024

Australian Energy Market Operator
Level 17, 197 St Georges Tce
PERTH WA 6000

Submitted via: wa.marketdevelopment@aemo.com.au

Procedure Change Proposal No: AEPC_2024_12 – Real-Time Market Suspension

Alinta Energy appreciates the opportunity to provide feedback on the proposed new WEM Procedure: Real-Time Market Suspension.

Reference/Issue	Feedback
1.2.2 Definitions	For clarity, we suggest that the term 'Manual Dispatch Period' should be defined for the purposes of this WEM Procedure.
2.1.2(b) Circumstances in which AEMO may suspend the Real-Time market	In accordance with paragraph 2.1.2(b) AEMO may suspend the Real-Time Market (RTM) in circumstances where it is unable to receive RTM Submissions from 'a market participant'. We suggest that further detail is provided to clarify the circumstances that would give rise to a RTM suspension where AEMO is unable to receive RTM Submissions from <u>a</u> single Market Participant as we would expect that a suspension is not necessary in many of these instances.
2.2 AEMO's process for determining to suspend	<p>Paragraph 3.1.2 of the Procedure Change Proposal Report states that AEMO's processes differ depending on the reason for the RTM suspension. The Report further provides that these processes are captured in Figure 1 on page 11 of the Procedure however, the proposed Procedure does not contain any figures.</p> <p>A figure setting out AEMO's processes for each of the circumstances listed in section 2 would assist in clarifying the processes by which AEMO will determine to suspend the RTM in accordance with the intended purpose of the Procedure and would be consistent with the requirement of clause 7.11D.1(a).</p> <p>Paragraph 2.2.4 appears to set out that AEMO <u>will</u> suspend the RTM within 2 hours of identifying an event that <u>may</u> require suspension of the RTM, if the root cause cannot be determined or AEMO does not consider the issue can be resolved within a reasonable timeframe. It is not clear what 'identifying an event' means in the context of the paragraph or why a 2-hour timeframe has been determined. It may not be appropriate to limit AEMO's decision making in circumstances where a suspension event (i.e. one or more of the reasons for market suspension set out in paragraph 2.1) is likely to occur (i.e. been identified) but hasn't yet occurred, to a 2-hour window. We suggest that the intention of paragraph 2.2.4 be clarified so that the circumstances that would give rise to a decision to suspend the RTM and the process that AEMO will use to make that decision are clearly documented.</p>
3. AEMO's processes during Real-Time Market Suspension	<p>It is not clear when AEMO will set the RTM Suspension Flag for each Dispatch Interval to one (1) when declaring a RTM suspension, as required by clause 7.11D.6. The RTM Suspension Flag is potentially an important indicator to market participants that the RTM has been suspended and the impacted Dispatch Intervals. When and how AEMO sets this flag should be clearly set out in this Procedure.</p> <p>Paragraph 3.2 sets out several matters associated with the determination of Manual Dispatch Schedules. The definition of Manual Dispatch Schedule sets out that AEMO may revise the Manual Dispatch Schedule over the course of the Manual Dispatch Period. The Procedure is not clear how AEMO will use 'reasonable endeavours to maximise what it considers would likely be the value of RTM trading if the RTM were not suspended' as required by clause 7.2.2A. While the Procedure sets out that AEMO may determine a Manual Dispatch Schedule using RTM Submissions the Procedure also sets out that AEMO may deviate from RTM Submissions. In addition, paragraph 3.3 provides that if AEMO suspends the market it must determine Market Clearing Prices. Further clarification</p>

	<p>should be provided in the Procedure as to how AEMO will maximise what it considers to be the value of real-time trading in circumstances where the RTM is suspended. This will demonstrate how AEMO will comply with clause 7.2.2A.</p> <p>The importance of having an effective communication plan in which all participants understand their role is recognised as a critical success factor in the effective management of disaster and emergency situations. We recommend that this Procedure provide further and more specific detail about the processes AEMO will follow and the processes which Market Participants are expected to follow during a RTM suspension. The WEM Procedure: Communications and Control Systems, paragraph 3, provides that where a major loss of communications occurs, the Market Participant and AEMO must revert to voice communications and, where available, AEMO may use the Network Operator's operational voice communications system. To avoid confusion in circumstances where usual communication channels are unavailable, we recommend that clear and direct procedures and processes are documented in the most appropriate WEM Procedure with relevant cross referencing. This will ensure that all effected parties understand what is required so that they can comply with the documented RTM suspension communication protocols. This will assist to limit the disruption to electricity supply and positively contribute to the maintenance of 'stable operations', especially in circumstances where a loss of communications, with or by AEMO, is unexpected, immediate and widespread across the market.</p>
<p>4. Market Participant obligations during Real-Time Market Suspension</p>	<p>The Procedure does not appear to contemplate circumstances where AEMO may be unable to issue a Market Advisory. Consideration should be given to the scenario where AEMO suddenly and unexpectedly loses the ability to communicate with Market Participants in the RTM.</p> <p>As much guidance and clarity as possible should be provided in this Procedure to assist Market Participants in understanding their obligations. This section needs to be clear:</p> <ul style="list-style-type: none"> • As to how a Market Participant will know to remain at the most recently issued Dispatch Instruction – what will trigger this in circumstances where a Market Advisory is unable to be distributed or is delayed in unforeseen circumstances (4.1.2(a)). • What validation is required to be undertaken and specifically when, it is unclear what is being validated and what 'ahead of time' means (4.1.2(b)). • How RTM Submissions are to continue to be made when relevant communications and control systems are not working (4.2.2(c)). • How and what information is to be submitted to AEMO if the Market Participant is unable to provide RTM Submissions (4.1.2(d)). <p>We suggest that AEMO consider potential options for scenario planning with Market Participants to ensure all potential contingencies and risks associated with the actions required by Market Participants are effectively mitigated and the processes and required actions set out in this Procedure are sufficiently comprehensive and broadly understood.</p>

Thank you for your consideration of Alinta Energy's submission. Should you wish to discuss this further please contact me at Jean.Mileto@alintaenergy.com.au or on 0437014596.

Yours sincerely

Jean Mileto
Regulation and Compliance Specialist