Minutes

Meeting Title:	RC_2014_03: Administrative Improvements to the Outage Process - Workshop
Date:	25 October 2019
Time:	9:00 AM – 11:35 AM
Location:	Training Room 1, Albert Facey House 469 Wellington Street, Perth

Attendees	Representing	Comment
Stephen Eliot	RCP Support	
Jenny Laidlaw	RCP Support	
Natalie Robins	RCP Support	
Jake Flynn	Economic Regulation Authority (ERA)	
Dimitri Lorenzo	Bluewaters Power	
Paul Arias	Bluewaters Power	From 9:15 AM

	accordance with the triggering outage notifications issued by System Management would be deemed to be acting in compliance with the Market Rules and would not be exposed to a Forced Outage due to late changes to a triggering outage. Ms Laidlaw clarified that triggering outage notifications would not be used when the impact of network constraints on specific generators could not be predicted in advance. There was some discussion about the circumstances under which a generator that was subject to a regional cap would be eligible for a Consequential Outage, and the market impacts of unexpected changes to the output of large Non-Scheduled Generators due to network outages.	
13-14	**Logging Forced and Consequential Outages in advance – options for notification mechanism** Attendees discussed the three options for a triggering outage notification mechanism presented in the discussion slides. The following points were discussed: Attendees raised no concerns about the increase in Dispatch Advisories (**DAs**) if Option 2 or Option 3 was implemented, noting that the format of the DAs could be standardised to help participants identify triggering outage notifications and manage them differently if they chose. Mr Clayton James noted that one of the drawbacks of using the DA mechanism was that triggering outages can be approved several months before they commence. Using a DA in these situations would not provide participants with an ongoing view of upcoming triggering outages. Mr Paul Arias agreed that the timing of such notifications might be an issue for Bluewaters. Ms Laidlaw considered that an ideal solution would include both notifications and a reporting mechanism like that suggested by AEMO in Option 3. However, if a notification mechanism alone could provide the required information then it might be difficult to justify the additional costs of a PASA-like reporting mechanism. Mr Brad Huppatz considered that the greater concern was about the timeliness of notifications relating to late changes and the obligations on Market Generators to respond. Mr James and Mr Fairclough suggested the implementation of a combination of Options 2 and 3. This would involve AEMO issuing DAs as per Option 2 but also looking to include some of the information in the PASA tool that exists today. The combined mechanism could be reviewed after a period to assess its effectiveness. If Market Participants preferred the DAs the PASA information could be removed; alternatively, if the PASA reports were providing Market Participants with sufficient longer-term information then	

AEMO would stop issuing D

16-17 Logging Forced and Consequential Outages in advance – revised proposal

Mr Fairclough and Mr James confirmed that AEMO would not incur any additional IT costs to allow ex-ante submission of Consequential Outage requests, regardless of the method chosen for the submission of these requests.

Mr Arias sought clarification on what would happen if a Market Generator submitted an ex-ante Consequential Outage request that System Management failed to approve ex-

The following points were discussed:

Ms Laidlaw noted that a Scheduled Generator was expected to return to the Balancing Market as soon as practicable after a late notification of a change to a foreseeable constraint, taking response time, gate closure limits and start-up times into account as contemplated in new section 7A.2A (contained in the Amending Rules for RC_2013_15).

	Mr James suggested that the situation might be different for notifications received before versus after Balancing Gate Closure. Mr Arias clarified that his comments only related to notifications received after Balancing Gate Closure. Mr James noted that it was not simple for System Management to automate the release of a constraint after the end of a triggering outage. There was some discussion about how System Management manages the return to service of Non-Scheduled Generators (e.g. by limiting the ramp rates of Facilities to avoid Power System Security issues). Mr Fairclough confirmed that System Management generally releases the constraints on a Non-Scheduled Generator as soon as the relevant triggering outage has ended. There was further discussion about options to take market impacts as well as security concerns into account when managing the return of Non-Scheduled Generators from outages. Ms Laidlaw noted that questions about the minimum notice period for a late change to a triggering outage, and the return of a Non-Scheduled Generator to the Balancing Market after a late change to a foreseeable constraint, would be included in the call for further submissions on RC_2014_03.	
20	**Logging Forced and Consequential Outage in advance – triggering outage notifications for foreseeable constraints caused by Forced Outages** Attendees raised no concerns about the proposals to: clarify the obligation on Rule Participants to notify System Management if they become aware that their Outage Facility will suffer a Forced Outage in the near future; and provide System Management with an option to issue triggering outage notifications for network Forced Outages that it considers will have a material market impact. Mr Lei asked whether a Market Generator would be obliged to update the start and end times of its Consequential Outage to reflect when the triggering outage actually started and ended. Ms Laidlaw replied that if System Management issued a triggering outage notification updating a foreseeable constraint start or end time then the Market Generator may need to amend a previously submitted and/or approved Consequential Outage request. For this reason, Market Generators were likely to prefer to submit these requests after the foreseeable constraint had started, and possibly after it had ended.	
21-25	**Capacity-adjusted outage quantity calculation: RCOQ vs Capacity Credits** Mr Huppatz asked if a requirement to publish maximum site temperature data could be included in the Rule Change Proposal. At least some of this data was sourced from Western Power's SCADA systems and Mr Huppatz was unsure whether Synergy	

	was permitted access under the current confidentiality regime. Attendees generally agreed it would be helpful for a Market Generator to have access to this information for its Facilities. Attendees raised no concerns about: the updated proposal to calculate capacity-adjusted outage quantities (as set out in slide 25); or the proposed removal of the requirement to report Forced Outages for failures during an approved Commissioning Test.	
26-33	**Quantity of de-rating for Scheduled and Non-Scheduled Generators** Attendees raised no concerns with the proposed approach to reporting outage quantities for hybrid Non-Scheduled Generators (as set out in Option 4 on slide 31). Ms Laidlaw noted that the Rule Change Panel had reviewed the issue raised by Alinta during the second submission period for RC_2013_15 about the administrative burden of outage reporting for large Non-Scheduled Generators, but did not consider that an increase in the size of individual wind turbines warranted further changes to the materiality threshold. Mrs Papps reiterated her view that the outage reporting requirements for large Non-Scheduled Generators would be administratively burdensome. Ms Laidlaw noted that under the current Market Rules, Market Generators are required to schedule an outage if a single wind turbine is out of service. Attendees raised no other concerns with the updated proposal for recording outage quantities for Scheduled Generators and Non-Scheduled Generators set out in the appendix of the discussion slides.	
34	**Use of outage quantities in the Market Rules and clarification of timeframes** Ms Laidlaw noted that no material changes had been made to the proposal for the use of outage quantities in the Market Rules that was discussed at the 17 January 2018 workshop for RC_2014_03. Ms Laidlaw advised that the call for further submissions will include: an updated table showing which outage quantities (unadjusted vs capacity-adjusted) will be used for which purposes; and details of the proposed Planned Outage Rate, Forced Outage Rate and Equivalent Planned Outage Hours calculations. Attendees raised no concerns with the proposed approach to address the RC_2014_03 issues relating to the use of outage quantities in the Market Rules and the clarification of timeframes for providing outage information to System Management.	

details of Forced Outages that have already ended, particularly for Non-Scheduled Generators.

Mrs Papps considered that the requirement would also be quite onerous for the logging of Forced Outages for deviations from Dispatch Instructions. Mrs Papps did not think that Alinta would be able to meet a 1 Business Day deadline for these updates, which were currently submitted periodically in batches.

In response to a question from Ms Laidlaw, Mr Arias advised that a Market Generator was usually aware that it had failed to comply with its Dispatch Instructions before it saw its meter readings, because it would have received an email about the deviation from System Management.

Ms Laidlaw asked what problems a Market Generator might have reporting a larger, incomplete Forced Outage in SMMITS by the proposed deadline. Mrs Papps noted that sometimes it would be difficult on the first day of a Forced Outage to estimate how long the Facility would be unavailable. Ms Laidlaw agreed that it would need to be understood that the end time provided in the initial notification was only a 'best estimate'.

Mr Lei suggested that in some circumstances a Market Generator might need a unit to cool down before the Market Generator could inspect it and form a reasonable estimate of its return to service time. Mr Huppatz agreed that it can take some time to determine the cause of a generator failure. Ms Laidlaw questioned whether a slightly longer deadline (e.g. 2-3 Business Days from the start of the outage) would make any significant difference to the accuracy of the initial estimates.

In response to a comment from Mrs Papps, Ms Laidlaw clarified that the proposed requirement to keep a record of the reasons for changes to SMMITS outage records would only apply to changes made after the 15-day limit.

Mrs Papps expressed interest in a discussion around whether there could be a materiality threshold applied to deviations from Dispatch Instructions. Mr Fairclough suggested that Tolerance Ranges fulfilled this function. Mrs Papps replied that Tolerance Ranges applied to System Management's reporting obligations rather than a Market Generator's compliance obligations.

Ms Laidlaw agreed that there were problems with the current rules around Tolerance Ranges and deviations from Dispatch Instructio

	way to specify and apply a different reporting deadline to this type of Forced Outage.	

42 Timing requirements for Forced Outages in SMMITS