

## Wholesale Electricity Market Rule Change Proposal Submission

### Call for Further Submissions: Administrative Improvements to the Outage Process (RC\_2014\_03)

Submitted by

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CFFS Question	AEMO's Response
3. Whether System Management should be required to ensure that the	

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<p>6. Whether a Rule Participant should be obliged to notify System Management if it is aware that its Outage Facility will suffer a Forced Outage in the near future.</p>	<p>At this time, AEMO has not identified any concerns with the proposed obligation. Notwithstanding this, consideration may need to be given as to whether the obligations introduced in RC_2013_15: Outage Planning Phase 2 (commencing 1 February 2020) concerning circumstances where a participant becomes aware or ought to have become aware that its facility will be unavailable for service, cover the Forced Outage scenarios described in the CFFS.</p>
<p>7. Whether triggering outage notifications for network Forced Outages that are triggering outages should be optional or mandatory, and if mandatory, what materiality thresholds should apply (if any).</p>	<p>When determining whether triggering outage notifications should apply to Forced Outages, consideration should be given as to whether the existing Dispatch Advisory rules provide the necessary transparency for many of these Network Forced Outage events. For example, there are existing requirements to issue Dispatch Advisories for out of merit dispatch as well as requirements to issue Dispatch Advisories for significant outages.</p> <p>Should the use of triggering outages be extended to Forced Outages and therefore require triggering outage noti</p>

CFFS Question	AEMO's Response
<p>9. Any concerns about restricting the proposed exemption from a Reserve Capacity Test to situations where System Management has notified a Market Participant of a foreseeable constraint on its Facility, or where the Market Participant has notified System Management that its Facility will be subject to a Forced Outage in the relevant period.</p>	<p>At this time, AEMO has not identified any concerns with the proposed restrictions.</p>
<p>10. Any concerns or suggestions regarding the proposed definition for the maximum sent out capacity Standing Data items in Appendix 1(b)(iii) and Appendix 1(e)(iiiA).</p>	<p>At this time, AEMO has not identified any concerns with the proposed definition.</p>
<p>11. Any concerns about the proposed changes to the method used for capturing unadjusted outage quantities for Scheduled Generators in SMMITS.</p>	<p>AEMO considers that the proposed changes are consistent with those discussed with the Rule Change Panel previously.</p>
<p>12. Viable alternatives to the Rule Change Panel's proposed approach for reporting unadjusted outage quantities for Scheduled Generators that have failed to comply with an instruction from System Management (e.g. where a Scheduled Generator trips off during a Trading Interval, fails to synchronise when expected or fails to achieve the output levels specified in its Dispatch Instructions).</p>	<p>AEMO supports the proposal to clarify the method for calculating a Forced Outage where a generator has failed to comply with a Dispatch Instruction. AEMO does not have any suggestions for alternative calculation methods.</p>



CFFS Question	AEMO's Response
<p>19. Whether the time periods in the proposed obligation to report extended Forced Outages in SMMITS (i.e. to report within 24 hours if the outage period exceeds 24 hours) is appropriate or whether different time periods should be used.</p>	<p>At this time, AEMO has not identified any concerns with the proposed changes.</p>
<p>20. Whether the proposed deadlines for reporting Forced Outages for Non-Intermittent Generators with Capacity Credits provide an appropriate balance between prudential risk and administrative burden; and if not, what deadlines would provide a better balance.</p>	<p>At this time, AEMO has not identified any concerns with the proposed deadlines.</p>
<p>21. Any concerns about the proposed requirement to update existing Forced Outage records within 1 Business Day of receiving more accurate information about the end time or outage quantity.</p>	<p>At this time, AEMO has not identified any concerns with the proposed requirement.</p>

22. Any concerns about the proposed 9





timeframes should be considered when assessing the Rule Change Proposal against the Market Objectives.

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**3. Please indicate if the proposed change will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.**

Should the Rule Change Proposal incorporate the proposed changes detailed in the CFFS, AEMO will be required to modify its systems and processes to implement the new obligations.

In the absence of proposed amending rules, AEMO's previous ROM estimate to implement these changes is \$759,000. AEMO will provide a revised implementation estimate when further details on the proposed amending rules are available.

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**4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.**

Based on the ROM estimate in Section 3 above, AEMO estimates it will require 6 to 9 months to implement all the changes proposed in the CFFS, including any required procedure changes. As stated above, AEMO will provide a revised estimate of the time required to implement these changes once further details on the proposed amending rules are available.

As this rule change will require AEMO to modify the systems being transferred as a part of the System Management Systems Transitions (**SMST**) project, the earliest AEMO anticipates it will be able to commence modification of these systems is during the second half of 2020 (following a 3-month