



Minutes

Meeting Title:	Power System Security and Reliability Standards Working Group (PSSRSWG)
Date:	31 October 2024
Time:	11:00am 12:35pm
Location:	Online, via TEAMS

Attendees	Company	Comment
Dora Guzeleva	Chair, Energy Policy WA (EPWA)	
Mena Gilchrist	Australian Energy Market Operator (AEMO)	Left at 12.30pm
Toby Price	AEMO	Joined at 11.49am
Jean Mileto	Alinta Energy	Proxy for Hugh Ridgway
Elizabeth Walters	Economic Regulation Authority (ERA)	
Bronwyn Gunn	EPWA	
Sanna Pember	EPWA	
Luke Skinner	Expert Consumer Panel	
Geoff Glazier	Mott MacDonald	
Genevieve Teo	Synergy	Proxy for Rhiannon Bedola
Sabina Roshan	Western Power	

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3. ACTION ITEMS

(a) Network reliability improvements

The Chair noted that:

Mr Schubert raised a matter in the 25 July PSSRSWG meeting regarding using outage data as a key indicator for prioritising the resolution of issues causing outages.

The question raised was what could be included in the new standards to adequately incentivise Western Power to adopt more of the practical solutions that are available with a positive cost-benefit outcome for society and customers.

Mr Schubert has provided additional commentary on this (not yet shared with the PSSRSWG). Some of the proposed opportunities to improve reliability are design and operational in nature, and therefore out of scope for this review.

EPWA will take _____ in future considerations.

(b) PSSR related issues in the Western Power Technical Rules submission to the ERA

The Chair noted that:

At the last PSSRSWG meeting, members were asked to provide any additional input on this item.

_____ s unchanged: the plan is _____ proposed approach on some of the issues, with updated proposals on some of the issues through the Consultation Paper.

- Ø Ms Gilchrist noted that AEMO provided some additional commentary on the Technical Rules issue list.

Ms Gunn clarified that the proposals will be carried forward for consultation, but additional notes will be included to prompt further consideration in submissions on matters for which AEMO has concerns.

4. STAGE 3 -

plan, GPS register to document all the agreed standards, a self-monitoring program and a compliance framework.

Appendix 12 of the WEM Rules contains ideal and minimum standards, between which proponents can negotiate, and some Technical Standards have Common Requirements.

- Facilities that meet the ideal performance standards are able to progress their connections without any negotiation.
- If the proposed GPS is less than the Ideal Performance Standard in any area, acceptance is subject to negotiation with the Network Operator and AEMO.
- Facilities cannot negotiate below the minimum standard.

Ø Ms Gilchrist clarified that the "minimum" does not set the minimum standard for PSSR. She added that there are many instances where AEMO may not accept the minimum, such as for locational reasons. Instead, the minimum serves as the lower threshold for negotiation.

Ms Gunn acknowledged the

Ms Pember presented slide 6 (Overview of proposed framework).

Ms Gunn presented slide 7 (Proposed categorisation) noting that:

EPWA proposed framework for the new Electricity System and Market Rules (ESMR) is based on the four categories listed in the slide, though the titles of these categories may be subject to change.

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The slides have been updated slightly since they were circulated to the PSSRSWG, with changes highlighted in red for transparency.

EPWA previously planned to leave the standards for Low Voltage (LV) connected facilities to be dealt with under the Distributed Energy Resources (DER) Work Stream. However, after reviewing how these standards might fit into an integrated framework, recent discussions with the DER team showed alignment in the approach and, therefore, EPWA now proposes to include them in the PSSR Standards Review.

- EPWA has not yet reviewed the standards with Western Power and AEMO, who contributed significantly to this work, to confirm readiness for their inclusion in the draft consultation paper.

Ø Ms Walters asked whether the LV proposal could contain some potentially contentious elements.

Ms Gunn explained that the approach outlined in the upcoming slides is largely a "lift and shift" of the existing framework, with a few changes as per the 2023 Technical Rules submission to the Economic Regulation Authority (ERA).

Ms Gunn presented slide 8 (User Standards – Energy Producing Systems (EPS)) and noted that this table (and tables in upcoming slides) illustrates how the standards would apply across the different proposed categories.

She noted that that the crosses for the Large Technical Users Standard indicate which parts of Appendix 12 would apply, noting that sections 12.2 and 12.5 do not apply to synchronous condensers, as they do not produce active power.

Ø Mr Skinner agreed with the proposed approach.

Ms Gunn presented slide 9 (Suitability of the Appendix 12 standards). She clarified that work to the MAC, and the MAC will be informed that this will be included afterward.

Ms Gunn presented slide 10 (User Facility Standard framework for Loads (including ESR)) and clarified that the technical requirements are derived from the 2023 proposed Technical Rules, which are listed out. She noted that the governance clauses in section 3.4 of the Technical Rules are not included here.

Ms Gunn presented slide 11 (Technical Requirements for hybrid facilities).

- Ø Ms Gilchrist inquired about how this proposal will work in relation to the recent rule change which allows for separate facilities behind a connection point.

Ms Gunn responded that compliance with the technical standards can still be assessed at the connection point, regardless of whether there is a single or multiple facilities behind it or of how the facilities are organised for wholesale market participation.

- Ø Ms Gilchrist noted that the PSSR Standards Review Technical Working Group (TWG) discussed this issue yesterday and that Mr Price, who attended the meeting on behalf of receive a debrief from Mr Price and asked whether the TWG was in agreement with this proposal.

Ms Gunn responded that:

there had been a thorough discussion on this topic in the TWG and, overall, there was a general comfort level with the approach.

one of the primary points of debate among the group was the need to maintain access to the data behind the connection point for proactive monitoring.

this data is valuable for early detection, as issues might begin behind the connection point without immediate non-compliance showing at the connection point itself.

such data could prompt model updates to account for differing system behaviours under varying conditions.

- Ø Ms Roshan agreed that the TWG reached an overall consensus that compliance with the User Technical requirement will be measured at the connection point, provided there is adequate monitoring and visibility at the facility level. This includes the ability to collect data effectively at each sub-component, along with applicable control systems. She added that there will need to be coordination between the components but for overall PSSR it is a good thing to have compliance at the connection point.
- Ø Ms Gilchrist asked whether the current approach, which allows for some flexibility to measure compliance at a point other than the connection point if required, will be maintained.

The Chair clarified that:

that data can be collected in the same way as for any facility with multiple technologies behind the connection point (i.e. at the component level).

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Ms Gunn noted that certain sections of Appendix 12 are being examined because practical experience indicates that some newer technologies, such as grid-forming inverters, find it difficult to meet them and these issues will be consulted on as part of the paper.

(a) Governance Framework for PSSR Standards

Ms Gunn presented slide 15 (Criteria for best practise governance).

Ø Ms Walters queried the last dot point by design (i.e. avoid the need for , noting that there might still be enforcement actions.

Ms Gunn agreed and clarified that

She emphasised the importance of selecting panel members carefully to ensure they possess the necessary technical understanding and to avoid conflicts of interest, noting that consumer representatives would also be included on the panel.

Ø

The Chair explained that after extensive discussion, it was decided to propose only one approach either derogations or negotiated outcomes as maintaining both would be inefficient. She emphasised that a negotiation framework must include accountability and align with market rules for transparency. Without disclosing participant names or specific facility details, publishing the negotiated standard and basic facility information would ensure equitable treatment and provide early insight for new facilities on past precedents for network connections.

- Ø Ms Roshan expressed concern over the administrative burden that publishing negotiated standards might impose on Western Power. Under the Technical Rules derogation framework, only the specific clause of exemption was published. Now, with the User Facility Standards Framework, customers can negotiate up to 16 different requirements, requiring Western Power to detail whether each clause is at the minimum, ideal, or a negotiated level. She questioned the practicality and value of publishing such extensive info

