



St Georges Square
Level 8, 225 St Georges Terrace
PERTH WA 6000

PO Box 5796
PERTH WA 6831

T: +61 8 9261 2888
F: +61 8 9261 2880

Rule Change Panel
Submission by email: support@rcpwa.com.au

11 January 2019

Dear RCP

RESPONSE TO CALL FOR FURTHER SUBMISSIONS: OUTAGE PLANNING PHASE 2 – OUTAGE PROCESS REFINEMENTS (RC 2013 15)

Bluewaters welcomes the opportunity to provide comments on the above Rule Change paper (Paper). Bluewaters thanks the Rule Change Panel Secretariat for conducting workshops to discuss the rule change throughout 2018. This process provides an ability to work through practical applications of the rule change with other market participants and the market operator which Bluewaters believes achieves better outcomes in the consideration and drafting of the rule change.

As a result of Bluewaters' involvement in the workshops to date, responses below to the feedback sought in the Paper are provided in addition to feedback provided in the workshops which have already been taken into account in preparing the Paper. Where a question is not addressed below, Bluewaters has no specific feedback for the question asked by the RCP Secretariat.

Feedback

Question 1

While the proposed change will not directly impact Bluewaters, the principle to include all Scheduled Generators on the Equipment List is a sensible approach to reduce any potential generator discrimination.

Question 2&3

While the proposed change will not directly impact Bluewaters, the proposed materiality threshold concept is supported to reduce administrative burden on Non-Scheduled Generators (NSG).

Question 4

While the proposed change will not directly impact Bluewaters, given AEMO do not require the unavailable capacity for NSG, it makes sense to reduce administrative burden by removing any requirement for inclusion of unavailable capacity in Balancing Submissions for NSG.

Question 5&6

Generally, all available resources that contribute to the generation capability in the market should be considered in the PASA studies and evaluating Planned Outage requests. This includes Facilities allocated Capacity Credits as well as those without Capacity Credits. There are a number of reasons why a facility may not be allocated Capacity Credits but still continually make their Facility available for dispatch. In such a situation where a Facility is seen to reliably provide energy to the market, its generation capability should be considered in the reserve margins. Acknowledging that at times it may not be clear to AEMO how reliable this non Capacity Credit generation capability may be, perhaps a threshold of observable operation (% of intervals made available for example) can be considered to determine the inclusion in the reserve margins. If this approach is taken, then Question 5 gains more importance to having outage reporting requirements for this non Capacity Credit generation so that the reserve margin calculations are more reliable.

Question 7

Acknowledging that there may be practical limitations for a Generator being able to respond to such a direction to return from a Planned Outage that is already under way, Bluewaters agrees with the proposal and suggest clear governance should be applied such as issuing a Dispatch Advisory advising participants that AEMO has instructed Market Participant X to revise its submission within Gate Closure due to Outage rejection for example. This will allow other Market Participants to assess their expectation of dispatch amount with a similar effect to the rules requiring a Dispatch Advisory for Out of Merit generation.

Question 8

Agree with the proposed amending rules to allow Commissioning Test while under a Planned Outage. This reflects the reality of returning a Generator to service after a period of maintenance.

Question 9

Agree the clause can be deleted as the requirement is addressed by other provisions.

Question 10 & 11

Bluewaters firmly believes that due to the complexity of planning an outage with resourcing and energy requirements, the earliest approval time possible should be applied. Executing Planned Outages are the most significant burdens for Bluewaters to manage as a Market Generator. To have this significant undertaking subject to approvals of TD-2 or later is entirely impractical. Smaller more opportune outages may be less affected by later approvals in which case the TD-2 approval may be sufficient. In practice, Bluewaters requests Planned Outages at the same time that it is undertaking detailed planning for the outage. This is the point where Bluewaters is looking for certainty to lock in resources, contractors, parts and replacement energy. As time passes and these aspects require locking in, the ability to move an outage becomes increasingly difficult. An approval requirement that is tied to a time period after the application date rather than the Trade Date would be a more appropriate mechanism to provide the required certainty for a Generator and reflects the associated significance of the outage approval based on the lead time of the approval being sought.

Question 12

No further suggestions to the change criteria for Outage Plans or Opportunistic Maintenance outlined in the Paper. Bluewaters notes that a quantitative measure of "material increase" will help to remove uncertainty surrounding changes to Outage Plans or Opportunistic Maintenance.

Question 13 & 14

Bluewaters supports the proposed availability requirements for Planned Outages outlined in the Paper and believes the changes will provide more efficient outcomes. If such availability requirements were implemented, Bluewaters considers that AEMO should be obligated to reject Outage requests due to availability issues; this will eliminate subjective discretion and avoid any potential discrimination for Market Participants.

Question 15

Given the response provided to question 10, if AEMO's obligation to approve Scheduled Outages was linked to the application date, then the availability requirement could be linked to the Approval into AEMO's outage schedule. However, failing the above, Bluewaters supports the position outlined in the Paper linking the availability requirement to the Acceptance into AEMO's outage schedule.

Question 16

Bluewaters supports extending the exemptions provided in MR 3.19.2D(a) to Planned Outages that immediately follow any Planned Outage of the relevant capacity.

Question 17 & 18

Bluewaters considers that the additional changes discussed in the Paper provide sufficient safeguards against disingenuous Planned Outage requests. Ensuring that the subjectivity applied to the satisfaction of evidence is appropriately transparent will be crucial to the application of the safeguards.

Question 19

While the proposed change will not directly impact Bluewaters, the principle to apply the proposed availability declaration requirements to Planned Outages of other Equipment List Facilities is a sensible approach to reduce any potential discrimination in the outage scheduling processes.

Should you have any questions regarding this submission please contact Paul Arias on 08 9261 2828 or paul.arias@bluewatersps.com.au.

Yours sincerely



Paul Arias
Trading and Commercial Manager