

Wholesale Electricity Market Rule Change Proposal Submission

RC_2014_03

Administrative Improvements to the Outage Process (Call for Further Submissions)

Submitted by

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Submissions on Rule Change Proposals can be sent by:

Email to: support@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

1. Please provide your views on the proposal, including any objections or suggested revisions.

Western Power welcomes the opportunity to provide a submission to the Rule Change Panel (**RCP**) on its Call for Further Submissions Report for Rule Change 2014_03: Administrative Improvements to the Outage Process (**Report**). Western Power's comments are limited to the matters raised in the questions below, as raised by the RCP in the Report.

Question 5: Whether a Network Operator should be able to reduce the period of a triggering outage (for the purposes of its performance statistics) if it notifies System Management too late for System Management to update the associated foreseeable constraints.

Western Power does not have performance incentives to reduce the period of its planned outages to a shorter period. However, one of Western Power's main objective is to ensure the safe delivery of its Planned Works Program. In doing so, Western Power takes a risk-based approach when scheduling its planned outages and will only notify System Management of any changes to its planned outages if there is a high level of certainty of those changes occurring. For triggering outages, this may be a notification of a delay, late cancellation or early return to service. Western Power will continue to provide System Management with these notifications and will continually look for opportunities to improve the notification process.

Question 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.

Western Power has a protocol in place to notify System Management of potential threats to power system security, this includes notifications on the failure or imminent failure of items of network equipment. Western Power will provide a Forced Outage notification to System Management in response to an unplanned outage of an item of network equipment. For example, Western Power recently informed System Management of a bushfire occurring in the vicinity of its transmission lines where the transmission lines tripped multiple times due to the bushfire.

Question 18: Whether clause 3.21.2 should be amended to extend the criteria for a Consequential Outage to include triggering outages of any item of equipment that is part of a Network, not just those items that are included on the Equipment List.

Western Power considers that further investigation would be required to determine the materiality of the concerns raised under paragraph 4.5 of the Report. In particular, the likelihood and/or frequency that an outage of a network equipment would cause an outage of distribution-connected Scheduled Generators and Non-Scheduled Generators, and the likelihood and/or frequency that Western Power's secondary network systems are likely to cause outages of transmission-connected generators. Western Power welcomes further engagement with the RCP and Rule Participants to discuss the specifics of the concerns and any relevant case studies.