**TEMPLATE**

Generator Performance Standards (GPS) Dispute Resolution Notice - Response

*The Dispute resolution mechanism under Section 1.42 of the* [*Wholesale Electricity Market (WEM) Rules*](https://www.erawa.com.au/cproot/21723/2/Wholesale-Electricity-Market-Rules-1-February-2021.pdf) *allows for the referral of disputes relating to the registration of generator performance standards or a generator monitoring plan for Existing Transmission Connected Generating Systems to arbitration.*

*This template must be used to respond to a Generator Performance Standards Dispute Resolution Notice which has been sent to both the Coordinator of Energy (Coordinator) and each other Party to a Dispute under clause 1.42.4 of the WEM Rules and in accordance with the process outlined in the* [*WEM Procedure: Dispute Resolution Mechanism for Existing Transmission Connected Generating Systems.*](https://www.wa.gov.au/government/document-collections/wem-procedure)

*Unless otherwise agreed by the Coordinator, the counterparty to a Dispute must provide a written response to the Coordinator (**energymarkets@energy.wa.gov.au) using this template within 10 business days of receipt of the Generator Performance Standards Dispute Resolution Notice.*

*The Coordinator will consider the information provided in both documents prior to determining whether a Dispute is to be referred to arbitration.*

1. Details of the Party responding to the referral to the Dispute resolution

*The Party responding to a request to refer to Dispute resolution must provide at least two contacts who can provide advice on the matter(s) under Dispute.*

Party:

Contact Person:

Email:

Contact number(s):

Please provide at least one additional contact – more than one may be provided

Alternative contacts authorised to communicate on this matter:

Name:

Email:

Contact number(s):

Name:

Email:

Contact number(s):

1. **Details of Transmission Connected Generating System dispute relates to**

*This Dispute resolution mechanism only applies to Transmission Connected Generating Systems for which an Arrangement for Access has been executed prior to the GPS Commencement Date of 1 February 2021.*

Name of facility:

Location of relevant generating system:

Type and size (MW) of facility:

Date of Arrangement for Access:

Date of connection to SWIS:

1. **Details of the matter under dispute**

*This Dispute resolution process is only available for Disputes relating to the registration of agreed generator performance standards for each Technical Requirement under section 1.40 of the WEM Rules or Generator Monitoring Plan under section 1.41 of the WEM Rules for each Existing Transmission Connected Generating System.*

Registration of performance against one or more Technical Requirements (generator performance standards) [ ]

Generator Monitoring Plan [ ]

*The counterparty must provide their view of the matter that has been outlined in the relevant GPS Dispute Resolution Notice including a statement of their position on the matter. Please provide sufficient information for the Coordinator to determine whether it meets the requirements for referral to arbitration.*

Click or tap here to enter text.

1. **Overview of evidence to be provided**

*Please provide an overview of the evidence to be provided during the Dispute process following referral to the Generator Arbitrator (note the evidence itself is not required at this time).*

Click or tap here to enter text.

1. **Information on how the processes outlined in sections 1.39 – 1.41 of the WEM Rules (as applicable) have been followed**

*Sections 1.39 - 1.41 of the WEM Rules outline the processes Western Power, the Australian Energy Market Operator (AEMO) and Market Participants must follow to register a set of Agreed Generator Performance Standards and a Generator Monitoring Plan for each Transmission Connected Generating System. This Dispute resolution process is available for where agreement cannot be reached within the required timeframes.*

*Information contained in this section must include measures each party has taken to resolve the matter under sections 1.39 – 1.41 of the WEM Rules. Appendix 1 provides further guidance on the information that should be included in this section.*

# Dispute related to deadlines, timeframes and extensions of time:

If applicable, please provide details of any requesting, or granting of, extensions of time as outlined in section 1.39 of the WEM Rules:

Click or tap here to enter text.

**Disputes related to Registration of performance against each of the Technical Requirements (generator performance standards):**

Does the Dispute relate to an Access Standard?

**Yes** [ ]

**No** [ ]

Does the Dispute relate to a Reference Standard?

**Yes** [ ]

**No** [ ]

Does the Dispute relate to a Technical Requirement (tick all those that apply)?

|  |  |  |
| --- | --- | --- |
| **WEM Rule**  | **Technical Requirement**  | **Check if relevant** |
| A12.2 | Active Power Capability  |[ ]
| A12.3 | Reactive Power Capability  |[ ]
| A12.4 | Voltage and Reactive Power Control  |[ ]
| A12.5 | Active Power Control  |[ ]
| A12.6 | Inertia and Frequency Control  |[ ]
| A12.7 | Disturbance Ride Through for a Frequency Disturbance  |[ ]
| A12.8 | Disturbance Ride Through for a Voltage Disturbance  |[ ]
| A12.9 | Disturbance Ride Through for Multiple Disturbances  |[ ]
| A12.10 | Disturbance Ride Through for Partial Load Rejection  |[ ]
| A12.11 | Disturbance Ride Through for Quality of Supply  |[ ]
| A12.12 | Quality of Electricity Generated  |[ ]
| A12.13 | Generation Protection Systems  |[ ]
| A12.14 | Remote Monitoring Requirements  |[ ]
| A12.15 | Remote Control Requirements  |[ ]
| A12.16 | Communications Equipment Requirements  |[ ]
| A12.17 | Generation System Model  |[ ]

Does the Dispute relate to a Generator Condition or proposed Generator Condition?

**Yes** [ ]

**No** [ ]

Does the Dispute relate to a Proposed Alternative Standard?

**Yes** [ ]

**No** [ ]

**Disputes related to a Generator Monitoring Plan:**

Is there an Existing Monitoring Plan for the generator (as defined in clause 1.41.1)?

**Yes** [ ]

**No** [ ]

Does the Dispute relate to the Template Generator Monitoring Plan as published by AEMO?

**Yes** [ ]

**No** [ ]

Does the Dispute relate to Compliance Testing and Monitoring Requirements?

**Yes** [ ]

**No** [ ]

Please provide further detail of the matter(s) under Dispute based on the items selected above.

Click or tap here to enter text.

1. **Declaration of Conflict(s) of Interest**

*The process outlined in the WEM Procedure: Dispute Resolution Mechanism for Existing Transmission Connected Generating Systems requires that a Party to a Dispute must declare whether they believe that the Primary Generator Arbitrator, or any of the Secondary Generator Arbitrators, has an actual, potential or perceived conflict of interest with the subject matter of the Dispute, and the reasons why.*

*A list of Generator Arbitrators is available on Energy Policy WA’s* [*website*](https://www.wa.gov.au/government/document-collections/gps-generator-arbitrators)*. Please use this section to advise of any such conflicts of interest.*

Click or tap here to enter text.

**APPENDIX 1: ADDITIONAL GUIDANCE ON SECTION 5**

Further information is provided below in relation to the type of information which should be included in Section 5 to describe how the processes outlined in Section 1.3.9-1.41 of the WEM Rules have been followed prior to the Dispute.

**Extensions of Time**

Section 1.39 of the WEM Rules allows a Market Participant responsible for an Existing Transmission Connected Generating System to request extensions to the dates by which they are required to have Registered Generator Performance Standards for each Technical Requirement and an Approved Generator Monitoring Plan in place by agreement with Western Power and AEMO respectively. This section specifies the required timeframes for requesting, and granting of, extensions of time, and allows for more than one extension to be granted.

**Access Standard**

An Access Standard, as defined in clause 1.40.1, must be used where available (subject to power system security and reliability being maintained), however it is recognised that some of the Technical Requirements have been revised or are new and therefore an Access Standard is unlikely to exist.

Provide information on what each Party has done in relation to providing documents or information relating to the Access Standard (clause 1.40.2 and 1.40.3).

**Reference Standard**

A Reference Standard must be used if there is one available. However, most of the existing standards have been revised and there are three new standards for which no Reference Standard will exist. Appendix A of Western Power’s [*WEM Procedure: Generator Performance Standards for Existing Transmission Connected Generating Systems*](https://www.westernpower.com.au/media/4757/generator-performance-standards-for-existing-transmission-connected-generating-systems-20200203.pdf) provides details of the relevant Reference Standards for generating systems connected to the SWIS since 1997.

Information should cover the Reference Standard, details of why the Dispute has arisen (including what evidence re technical and/or costs has been provided as per Clause 1.40.7) and why the Dispute is not able to be resolved via the negotiation process for a Proposed Alternative Standard.

**Technical Requirements**

The Technical Requirements for transmission connected generating systems are contained in Appendix 12[[1]](#footnote-1) of the WEM Rules and include the Ideal Generator Performance Standard, Minimum Generator Performance Standard and any applicable Common Requirements for each Technical Requirement.

When negotiating generator performance standards for an Existing Transmission Connected Generating System and it is proposed to use the Minimum Generator Performance Standard for a relevant Technical Requirement, the Minimum Generator Performance Standard must be accepted by Western Power and/or AEMO (subject to power system security and reliability being maintained).

**Generator Condition or proposed Generator Condition**

The WEM Rules allow for the inclusion of a Generator Condition, whereby a Proposed Alternative Standard can contain actions that are only required if or when a ‘trigger event’ occurs. Information to be provided (as applicable) may relate to the condition, trigger event, or timeframes – refer to clause 3A.5.6 for further detail.

**Proposed Alternative Standard**

Where a Market Participant has proposed a standard or technical level of performance against a Technical Requirement that is less than the Access, Reference or Minimum standard (a Proposed Alternative Standard), the information in section 5 should address the following questions (as applicable):

* Did the Market Participant provide reasons and supporting evidence to demonstrate that the Proposed Alternative Standard meets the appliable criteria listed in clause 1.40.8?
* Was additional information relating to the Proposed Alternative Standard requested by either the Network Operator or AEMO? Was this information provided?
* Has the Network Operator consulted with AEMO in relation to this Proposed Alternative Standard?
* Has AEMO provided a written response to the Network Operator that states why the Proposed Alternative Standard should be rejected (see clause 1.40.16)?
* Has AEMO proposed an amended Proposed Alternative Standard, or recommended that either the Reference Standard or Minimum Generator Performance Standard be adopted (see clause 1.40.16)?
* Has the Network Operator rejected a Proposed Alternative Standard on the basis of any of the reasons listed in clause 1.40.19 and has the Network Operator provided written reasons for this decision and/or proposed an amended Proposed Alternative Standard?
* Has any Party to the Dispute proposed testing and/or the interrogation of data to demonstrate performance or capability of the Existing Transmission Generating System (see clauses 1.40.24‑1.40.27)?

**Generator Monitoring Plan**

AEMO has published a [*WEM Procedure: Generator Monitoring Plans*](https://aemo.com.au/-/media/files/stakeholder_consultation/consultations/wa_wem_consultation_documents/2021/generator-monitoring-plans-wem-procedure-v10.pdf?la=en&hash=8C400E97F0BCFCE52325BA8C15237FAA) which outlines the requirements for Generator Monitoring Plans.

Examples of the type of information that should be provided where the matter under Dispute relates to Generator Monitoring Plan are:

* Whether compliance with an Existing Generator Monitoring Plan was claimed to be either not possible or at unreasonable cost (see clause 1.41.2(b)).
* Whether AEMO provided written reasons relating to rejection of a proposed Generator Monitoring Plan that covers the criteria as outlined in clause 1.41.12?
* Did AEMO request any amendments to the proposed Generator Monitoring Plan in accordance with 1.41.14(c)?

**Existing Monitoring Plan**

It is acknowledged that some Existing Transmission Connected Generating Systems already have an Existing Monitoring Plan in place with Western Power. Where there is already a monitoring regime for a relevant Technical Requirement, this may be used in place of the requirements in the Template Generator Monitoring Plan (as published by AEMO).

If a Dispute relates to an Existing Monitoring Plan, examples of the types of information that should be provided are:

* Has an Existing Monitoring Plan (and relevant supporting documentation) been submitted to AEMO (as per clause 1.41.8)?
* Has AEMO advised that the method of monitoring in an Existing Monitoring Plan poses an unacceptable risk to Power System Security or Power System Reliability?
* Has AEMO provided reasons as to why it considers this to be the case (see clause 1.41.10)?
1. <https://www.erawa.com.au/cproot/21723/2/Wholesale-Electricity-Market-Rules-1-February-2021.pdf> - page 628. [↑](#footnote-ref-1)