

WEM Rules Tranche 4B

PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

Submission Date: *30 June 2021*

Section	Description / Issue	Proposed Drafting
3.6.1	There is no publication cycle or review for the UFLS document	
3.6.3	Consultation should not be limited to the Network Operator, but should be a market consultation involving all participants. The introduction of new services (eg VPPs, etc) means that more participants may be involved in UFLS processes and FCAS.	
3.6.4	The procedure focuses on AEMO and the Network Operator, but with Demand Response Providers expected to participate in the market, it would be good to see a trigger for a participant to initiate a review.	
3.6.8	It is unclear how other connecting participants will be made aware of the Network UFLS specification (which is likely to impact connection requirements) if the Network Operator is not required to publish its approved UFLS Specification.	
2.4.3	There doesn't seem to be a pathway for participants to raise / seek changes to technical standards. With new market requirements, changes to such standards by participants should be enabled.	
2.4.3(f)	It is unclear what advice / information that AEMO or Western Power should be able to provide the coordinator which could not be part of a submission.	
2.7.7 (cA)	This clause seems to indicate that any advice provided by AEMO/Western Power (suggest this should be Network Operator) is only provided at the Draft Rule Change Report, whereas it would be expected that this information should form part of the initial rule change proposal. Any further advice / information would be expected to be part of a submission or additional dialogue.	

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2.78(bA)/(bB)	<p>Suggest that amending rule 2.7.8(bA) with the additional parties is a more preferred drafting that adding another separate clause.</p> <p>It is also noted that the proposed new clause specifically cross references 2.4.3C, but clause 2.7.8(bA) has no similar cross reference.</p>	<p>(bA) reasons if the Coordinator has decided not to follow partially or fully the advice received from:</p> <ul style="list-style-type: none"> i. the Market Advisory Committee; ii. AEMO; and/or iii. Wester Power.
1.49.1	<p>It is unclear how the cross reference to Tranche 2 and Tranche 3 may operate as more tranches are implemented and rules in the Tranche 2 and 3 changes may be further amended.</p> <p>Further, it is unclear whether the term 'Tranche' is legally defined and if that impacts this drafting.</p> <p>It may be better to remove reference to Tranche 2 and 3 ?</p>	
A12.6.1.6	<p>Drafting is confusing as it implies agreement can also come from the protection scheme. Delete comma after '...or other schemes' or use brackets:</p>	<p>A12.6.1.6 Unless otherwise agreed by the Network Operator and AEMO, protection or other schemes, that disconnect the Generating System or elements of the Generating System, must not be used in order to meet the requirements of this section A12.6.</p>
A12.6.1.7	<p>This clause is confusing as it seems to include obligations relating to an automatic variable power control and obligations relating to generating units with turbine control.</p> <p>Suggest re-write this clause.</p> <p>A12.6.1.7 A Generating System must have an automatic variable Active Power control characteristic, where Generating Units with Turbine Control Systems must include equipment for both speed and Active Power control.</p>	

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A12.6.1.8	<p>This clause is complicated and convoluted – suggest re-writing it:</p> <p>A12.6.1.8 All Generating Units, or the Generating System as applicable, capable of operating in a mode in which it will automatically alter its Active Power output to arrest and correct to changes in power system frequency, with all Generating Units operating in this mode unless instructed otherwise by AEMO.</p>	
A12.6.1.9	<p>This clause is complicated and convoluted – suggest re-writing it</p> <p>A12.6.1.9 A dead band on each Generating Unit, or the Generating System as applicable, (the sum of increase and decrease in power system frequency before a measurable change in the Generating Unit's Active Power output occurs) which is less than +/-0.025 Hz symmetrical around 50.0 Hz.</p>	
7.13.11	Suggest remove variables (eg 'f', DI) from the text and instead define with the other variables as this is an introduction to equations	<p><u>Where:</u></p> <p><u>f is the Registered facility</u></p> <p><u>DI is the Dispatch Interval</u></p>