

Our ref: EDM 61474378
Contact: Sally Campbell (0414 565 648)

16 September 2022

Dora Guzeleva
Director Wholesale Markets
Energy Policy WA
Level 1, 66 St Georges Terrace
PERTH WA 6000

Dear Ms Guzeleva,

Western Power's Submission in response to the Tranche 6: Exposure Draft 2 of Proposed Wholesale Electricity Market Amending Rules

Western Power welcomes the opportunity to respond to Energy Policy Western Australia on the Tranche 6 Exposure Draft 2 of the Proposed Wholesale Electricity Market Amending Rules (Proposed Amendments).

In this submission we acknowledge Outage Intention Plans are to commence on 1 January 2025, support the amendments to Generator Performance Standards, and recommend changes to Non-Co-optimised Essential System Services (NCESS) and Forced Outages clauses.

In addition to this submission, we intend to submit further comments on the Proposed Amendments in Chapter 10 (Market Information) including minor wording and definitional changes by early October.

Tranche 6 Proposed Amendments retain the Exposure Draft text mark-up colours (i.e. Black: Rules in force; Green: [Amending Rules made on specific date](#); Blue: [Amending Rules made TBC](#); Red underlined and strikethrough: [New Amendments](#)).

Western Power's requested changes to the Proposed Amendments are in ***bold, italics and underline***. Please note that in reviewing the Proposed Amendments, we have only considered matters that are relevant to the Network Operator.

Western Power notes that the Proposed Amendments require WEM Procedures to be developed to capture further details on the matters covered in the Proposed Amendments, which will include further obligations that will be imposed on the Network Operator. As the WEM Procedures referred to in the Proposed Amendments have yet to be developed, Western Power has not been able to consider the details under the WEM Procedures in its review of the Proposed Amendments.



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Section 1.57. Specific Transitional Provisions – Key Operational Matters

Tranche 6 Proposed Amendments – Clause 1.57.12:

Despite anything to the contrary in the Post-Amended Rules, on and from the New WEM Commencement Day, AEMO and other Rule Participants are not required to comply with their respective obligations specified in:

- (a) clauses 3.18C.5(b) and 3.18C.12(c);
- (b) section 3.19; and
- (c) any other provisions relating to Outage Intention Plans under the Post-Amended Rules,
until after 1 January 2025.

Western Power response:

Western Power acknowledges new clause 1.57.12 clarifies Outage Intention Plan obligations are to commence on 1 January 2025.

Requirements for Transmission Connected Generating Systems

Tranche 6 Proposed Amendments – Section 3A and Appendix 12:

3A. Requirements for Transmission Connected Generating Systems (p 34 – 40)

Appendix 12: Transmission Connected Generating System Generator Performance Standards (p 69 – 100)

Western Power response:

Western Power has contributed to the Generator Performance Standard amendments and supports the corrections and improved clarity the changes will provide.

Section 3.11A. Triggering Procurement of Non-Co-optimised Essential System Services (NCESS)

Tranche 6 Proposed Amendments – Clause 3.11A.2:

Part 1. Amending Rules to commence on gazettal

Where a Network Operator reasonably considers that one or more of the following events has occurred or applies:

.....

the Network Operator must:

- (d) as soon as practicable, but in any event before making a submission under clause 3.11A.2(e), notify AEMO of each event that it considers has occurred or applies; and

Part 3. Amending Rules expected to commence on New WEM Commencement Day

~~Where-If~~ AEMO or a Network Operator reasonably considers that one or more of the following events has occurred or applies:

.....

then

- (f) AEMO must notify Western Power, or the Network Operator must notify AEMO (as applicable), of each event that AEMO or the Network Operator (as applicable)

considers has occurred or applies, as soon as practicable but in any event before making a submission under clause 3.11A.2(g); and

Western Power response:

Western Power supports notifying AEMO of trigger events, and of AEMO notifying Western Power.

We understand the objective is to inform AEMO versus consult. Western Power requires the notification timing, level of information and process be specified in the guideline to be developed by the Coordinator (as required under clause 3.11A.2A to commence on New WEM Commencement Day). Western Power recommends the notification be sent to specified email boxes with a confirmation of receipt required following a simple, practical, and efficient process that can be implemented within the business as usual. We also recommend the guideline provides a notification example and template,

Western Power also suggests that the term Western Power should be replaced with the term Network Operator in Part 1: clause 3.11A.2A(c) and Part 3: clause 3.11A.2(f).

Western Power proposes the following changes - Clause 3.11A.2:

Part 1. Amending Rules to commence on gazettal (and similar changes to clause 3.11A.2A)

~~Where~~ **If** a Network Operator reasonably considers that one or more of the following events has occurred or applies:

.....

(d) *as soon as practicable, but in any event before making a submission under clause 3.11A.2(e), notify AEMO of each event* ~~that it considers has occurred or applies;~~ and

Part 3. Amending Rules expected to commence on New WEM Commencement Day

If AEMO or a Network Operator reasonably considers that one or more of the following events has occurred or applies:

.....

(f) AEMO must notify ~~Western Power~~ **the Network Operator**, or the Network Operator must notify AEMO (as applicable), of each event ~~that AEMO or the Network Operator (as applicable) considers has occurred or applies~~, as soon as practicable but in any event before making a submission under clause 3.11A.2(g); and

Section 3.21. Forced Outages and Outage Quantity Calculations

Tranche 6 Proposed Amendments – Clause 3.21.2:

If an Outage Facility suffers, or will suffer, a Forced Outage, the relevant Market Participant or Network Operator must:

(a) notify AEMO in accordance with the WEM Procedure referred to in clause 3.21.10 as soon as practicable of:

- ~~i. the time the Outage commenced or is expected to commence;~~
- ~~ii. the time the Outage ended or is expected to end;~~
- ~~iii. the Outage Capability or Outage Capabilities affected;~~
- ~~iv. the Separately Certified Components of the Facility affected;~~

- ~~v. the cause of the Outage;~~
 - ~~vi. the Outage Facility affected;~~
 - ~~vii. for each affected Outage Capability and each relevant Dispatch Interval, an indication of the Remaining Available Capacity of each Outage Capability affected; and~~
 - ~~viii. for each affected Separately Certified Component of the Facility, an indication of the Remaining Available Capacity of the energy Outage Capability for that Separately Certified Component.~~
 - i. the Outage Facility affected by the Outage and, where relevant, each Facility Technology Type of the Outage Facility affected by the Outage;
 - ii. the Outage Capabilities affected by the Outage for the Outage Facility and for each Facility Technology Type of the Outage Facility;
 - iii. the cause of the Outage;
 - iv. the date and time the Outage commenced or is expected to commence;
 - v. the date and time the Outage ended or is expected to end;
 - vi. where relevant, an estimate of the Remaining Available Capacity of each Outage Capability for the Outage Facility;
 - vii. where relevant, an estimate of the Remaining Available Capacity for each Facility Technology Type of the Outage Facility; and
 - viii. any other details specified in the WEM Procedure referred to in clause 3.21.10, as specified in the WEM Procedure referred to in clause 3.21.10;
- (b) provide AEMO with full available details of the Forced Outage as prescribed in referred to in clause 3.21.2(a), as well as the time that the information required in clause 3.21.2(a) was first notified to AEMO, in accordance with the WEM Procedure referred to in clause 3.21.10; as soon as practicable, using best endeavours to provide AEMO with the full available details within 24 hours of the Forced Outage occurring and in all cases no later than the end of the next Business Day of the Forced Outage occurring;
- i. as soon as practicable;
 - ii. using best endeavours to provide AEMO with the full available details within 24 hours of the Forced Outage occurring; and
 - iii. in all cases no later than the end of the next Business Day of the Forced Outage occurring;

Western Power response:

The new obligation in clause 3.21.2(b) that will require Western Power to provide AEMO with the time that the information required in clause 3.21.2(a) was first notified to AEMO will:

- create unnecessary administration for Western Power, given that AEMO has real-time telemetry on the status of Western Power assets.
- excessively burden Western Power compared to Market Participants, given Western Power's significantly large asset base.

Option 1: Western Power request that the requirement be deleted (preferred option)

Briefly, we understand that AEMO already collate and process outage notification timing information as required (existing clauses 3.21.3, 3.22.2(b) and amended clause 3.21.5). This

has been the historic case and the amendment will create an unnecessary administrative burden on Western Power.

In addition, given that proposed clause 3.21.5 requires AEMO to keep a record of all Forced Outages of which it is notified or made aware, the new notification timing requirement will unnecessarily duplicate administration activities and records.

3.21.5. AEMO must keep a record of all Forced Outages of which it is notified of under clause 3.21.2(a) or otherwise made aware.

Western Power proposes the following changes - Clause 3.21.2(b):

(b) *provide AEMO with full available details of the Forced Outage referred to in clause 3.21.2(a), ~~as well as the time the information required in clause 3.21.2(a) was first notified to AEMO,~~ in accordance with the WEM Procedure referred to in clause 3.21.10:*

Option 2: Where the requirement is deemed necessary for Market Participants

The notification timing requirement is redundant for Western Power as AEMO are made aware of Western Power's Forced Outages by shared SCADA telemetry:

- AEMO are linked into Western Power's SCADA system and become aware of Forced Outages in real-time. This provides AEMO with the full available details of information referred to in clause 3.21.2(a) - except the cause (iii) and the expected duration (v).
- The time set in our Forced Outage submission to AEMO's IT system as the beginning of a Forced Outage is effectively the time AEMO first became aware via the shared telemetry.
- Clause 3.21.5 requires AEMO to keep a record of all Forced Outages of which it is otherwise made aware.

Because of this shared SCADA telemetry, Western Power differs from Market Participants, to whom the time AEMO were first notified plays a factor. Western Power recommends that the requirement exclude Facilities with shared telemetry.

Note: In instances where voltage support facilities become unavailable without telemetry alarms, the time of the first notification will be the same as the Western power's Forced Outage submission to AEMO's IT system.

Further, it is unclear if the requirement refers to the first notification for each piece of information provided under clause 3.21.2(a), only the first initial notification instance, or when AEMO is otherwise made aware of a Forced Outage.

Given the shared telemetry provides AEMO with the full available details and the clause 3.21.5 requirement for AEMO to keep a record of all Forced Outages of which it is made aware, Western Power recommends that the requirement refers to the time that AEMO was first made aware of the Forced Outage.

Western Power proposes the following changes - Clause 3.21.2(b):

(b) *provide AEMO with full available details of the Forced Outage referred to in clause 3.21.2(a), as well as the time that **AEMO was first made aware of the Forced Outage** ~~the information required in clause 3.21.2(a) was first notified to AEMO,~~ **except in instances where AEMO has access to shared SCADA data of the affected Facility,** in accordance with the WEM Procedure referred to in clause 3.21.10:*

Should you have any queries regarding this letter, please do not hesitate to contact Sally Campbell on 0414565648.

Yours sincerely,

Zahra Jabiri
Head of Regulation and Investment Assurance