

# Summary of Submissions

March 2024

WEM Procedure: Commissioning Tests





# Important notice

## Purpose

AEMO must publish, together with a final WEM Procedure, a summary of submissions received and the response of AEMO to issues raised in those submissions, with respect to amendments to Procedures required to be developed under:

- For clause 1.36.7(b) – Wholesale Electricity Market Amendment (Tranche 1 Amendments) Rules 2020.
- For clause 1.43.7(b) – Wholesale Electricity Market Amendment (Tranche 2 and 3 Amendments) Rules 2020.
- For clause 1.43A.6 – Wholesale Electricity Market Amendment (Tranche 5 Amendments) Rules 2021.
- For clause 1.43B.1 – Wholesale Electricity Market Amendment (Tranche 6 Amendments) Rules 2022 and (Tranche 6A Amendments) Rules 2023.

## Disclaimer

This document or the information in it may be subsequently updated or amended. This document does not constitute legal or business advice, and should not be relied on as a substitute for obtaining detailed advice about the Wholesale Electricity Market Rules or any other applicable laws, procedures or policies. AEMO has made every effort to ensure the quality of the information in this document but cannot guarantee its accuracy or completeness.

Accordingly, to the maximum extent permitted by law, AEMO and its officers, employees and consultants involved in the preparation of this document:

- make no representation or warranty, express or implied, as to the currency, accuracy, reliability or completeness of the information in this document; and
- are not liable (whether by reason of negligence or otherwise) for any statements or representations in this document, or any omissions from it, or for any use or reliance on the information in it.

# Submissions and AEMO's Response

The following written submissions were received as part of AEMO's stakeholder consultation.

Relevant Procedure Paragraph(s)	Submission	AEMO's Response				
Definition: Significant Maintenance	<p>Stakeholder advised the term "Significant Maintenance" appears to be contradictory to the overarching principles and practices outlined in the Wholesale Electricity Market (WEM) Rules.</p> <p>Specifically, the stakeholder raised concerns that Significant Maintenance can be interpreted as any maintenance that reduces the sent-out capacity of a Facility, which may be appropriate for Scheduled generators, however is not appropriate for a Semi-Scheduled Facility (SSF) or a Non-Scheduled Facility.</p> <p>The stakeholder advised they believed the WEM Rules provide that, maintenance may be undertaken on individual components of a SSF without requiring a Forced Outage. Specifically, clause 3.18.3(c)ii of the WEM Rules, considers that maintenance can occur over a Dispatch Interval if the reduction in available capacity is less than the smaller of 10% of Name Plate Capacity, or 10MW. This clause is to reduce the unnecessary Outage requirements that may arise from routine maintenance on a SSF.</p> <p>The lack of clarity about what constitutes 'major equipment' or a 'like for like replacement' could mean any maintenance that results in an individual turbine being taken offline. For example a Wind Turbine bearing replacement, or gearbox replacement may result in the requirement for a commissioning test to occur as the individual turbine is not operational. The proposed definition of Significant Maintenance as currently drafted may place an unrealistic burden on Semi-Scheduled Facilities and is counter to the principals established in section 3.18 of the WEM Rules. Taken to an extreme, the current drafting could mean a Commissioning Test is required following the replacement of individual inverters or even an individual solar panel in a PV Facility.</p> <p>To address this inconsistency, we propose the following additions to section 1.2.2:</p> <table><tr><td>Significant Maintenance</td><td>Maintenance, <u>requiring an Outage</u>, where: (a)...</td></tr><tr><td><u>Outage</u></td><td><u>As defined in clause 3.18.3 of the WEM Rules.</u></td></tr></table>	Significant Maintenance	Maintenance, <u>requiring an Outage</u> , where: (a)...	<u>Outage</u>	<u>As defined in clause 3.18.3 of the WEM Rules.</u>	<p>AEMO thanks the stakeholder for submitting this feedback. Defining Significant Maintenance was difficult and involved many different considerations. As such, we will continue to monitor the definition and make any necessary updates via the Procedure Change Process if it is not fit for purpose.</p> <p>AEMO has not made the change as suggested.</p> <p>AEMO does not believe that all Commissioning Test Plans would require an Outage and amending the definition may inadvertently allow maintenance that should be undertaken under a Commissioning Test Plan to go ahead without a Commissioning Test Plan.</p> <p>AEMO believes it isn't possible to include an exhaustive or complete list of equipment that would be considered "major equipment" considering the significant number of types of equipment relevant to different generators.</p> <p>AEMO understands that the use of major equipment may not provide clarity in some circumstances, however AEMO suggests Market Participants submit a Commissioning Test Plan if in doubt, or alternatively contact AEMO for assistance. AEMO will advise a Market Participant where Commissioning Tests may not be required.</p>
Significant Maintenance	Maintenance, <u>requiring an Outage</u> , where: (a)...					
<u>Outage</u>	<u>As defined in clause 3.18.3 of the WEM Rules.</u>					

Relevant Procedure Paragraph(s)	Submission	AEMO's Response
	The linking of 'Significant Maintenance' to the definition of an 'Outage' under the WEM Rules will clarify and quantify the extent to which the de-rating of a Facility constitutes 'Significant Maintenance'.	
3	<p>Stakeholder advised that AEMO should consult with Western Power during an assessment related to a Commissioning Test Plan categorised as 'High Impact' or 'New Facility Commissioning' to allow Western Power to assess required or impacted planned network outages or for other potential issues.</p> <p>Stakeholder recommended that Western Power should provide AEMO with endorsement for these categories of Commissioning Test Plan from Western Power following the above assessment prior to AEMO approving the plan.</p>	<p>AEMO discussed the feedback with the stakeholder and it was determined that the WEM Procedure sufficiently allows for collaboration with Western Power and provides sufficient time for Western Power to provide feedback to AEMO, where it identifies an issue that may impact Power System Security.</p> <p>Where Western Power advises AEMO of any issues that may impact Power System Security, AEMO will take this into account in its assessment under paragraph 3.1.1.</p> <p>AEMO will always work collaboratively with Western Power to ensure the scheduled CTPs do not hinder either party or Power System Security.</p>
3.2 and 6.1	<p>Stakeholder advised that in addition to submitting a Commissioning Test Plan categorised as 'high impact' or 'commissioning a new facility' to Western Power as per paragraph 2.4.3, the Market Participant should also submit an amended or revised plan to Western Power.</p> <p>Stakeholder suggested the submission to Western Power should in parallel with the submission to AEMO, and prior to AEMO approval. Stakeholder advised paragraphs 3.2 and 6.1 should be updated to reflect this.</p>	AEMO agrees and has added paragraphs 3.2.5 and 6.1.3 to require the submission of amended or revised Commissioning Test Plans to Western Power
6.3.3	Stakeholder advised this paragraph should be amended to ensure Western Power is advised of Commissioning Test Plan approvals. Stakeholder also advised there was a typo in the paragraph.	AEMO has amended the paragraph to require that approvals for Commissioning Test Plans categorised as "High impact" and "Commissioning a new Facility" are also submitted to Western Power. AEMO has also rectified the typo.
8	Stakeholder advised that a Market Participant should notify Western Power if a Commissioning Test Plan is withdrawn.	AEMO has added paragraph 8.1.2 to require a Market Participant advise Western Power that it has withdrawn the Commissioning Test Plan via the Commissioning Test Portal