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Dear Elizabeth

Draft decision - Technical Rules amendments April 2016

I refer to the Authority's draft decision of 7 September 2016 in relation to amendments to the Technical Rules proposed by Western Power in April 2016. The proposal was made under section 12.50 of the Electricity Industry Access Code 2004 (Access Code).

The proposed amendments comprised four main sections:

1. amendments to the wording of the Normal Cyclic Rating (NCR) criterion, which outlines the permissible level of power loss following the unplanned loss of a supply transformer at a substation;
2. the replacement of references to Electricity (Supply Standards and System Safety) Regulations 2001 with references to Electricity (Network Safety) Regulations 2015;
3. corrections to typographical errors; and,
4. the Technical Rules Glossary to be amended to enable the Rules to adopt the most recent approved revisions to Standards and Regulations.

Please refer below to Western Power's responses to the draft decision.

1 NCR planning criterion

Required amendment 1

Western Power must amend the wording of the clause 2.5.4 to provide clarity in relation to the requirements of the NCR criterion, similar to GBA's suggested wording as set out in paragraphs 26 and 27 in the draft decision.

Western Power agrees with feedback from Geoff Brown and Associates (GBA) and the Authority in relation to further clarifying this Rule, as set out in the following revised wording:

2.5.4 Zone substations

(b) Normal Cyclic Rating (NCR) Criterion

- (1) The NCR risk criterion permits a limited amount of unmet demand for power *transfer capacity* following the unplanned loss of a *supply transformer* within a substation.
- (2) The maximum power transfer through a substation subject to the NCR risk criterion must be the lesser of:
 - (A) 75% of the total power *transfer capacity* of the substation, with all *supply transformers* in service; or
 - (B) the *power transfer* for which the maximum unmet demand for power transfer capacity following the loss of the largest supply transformer in the substation is equal to 90% of the power transfer capacity of the rapid response spare supply transformer.

Further, text in the second paragraph of the explanatory box following cl. 2.5.4 is to be amended as follows:

2. The 1% Risk and NCR criteria are based on sharing a common spare *supply transformer* among a population of *supply transformers* across a number of *zone substations* within a geographically confined area. A trade-off is the risk of limited unmet demand for as long as it takes to deploy and install a spare *supply transformer*. The acceptance of this risk determines the application of these two criteria.

2 Replace out of date references to Electricity (Supply Standards and System Safety) Regulations 2001

Western Power concurs with the Authority's draft decision to approve the proposed amendments.

3 Corrections to cross reference and typographical error

Western Power concurs with the Authority's draft decision to approve the proposed amendments.

4 Dates of Standards and Regulations

Required amendment 2

Western Power should amend the Technical Rules as set out in paragraph 48 of the draft decision.

The Authority considers that good electricity industry practice, as required under Chapter 12 of the Access Code, would be to:

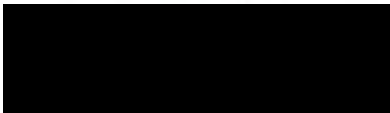
1. remove any terms in the Technical Rules Glossary that are not referred to within the body of the Technical Rules;
2. review the Technical Rules to identify all instances where standards are incorrectly date referenced, and amend accordingly; and
3. if it is appropriate to retain some dated references to Standards or Regulations, this should be clarified in Section 1 of the Technical Rules.

Western Power concurs with the Authority's draft decision not to approve the amendments originally proposed. Instead, Western Power will carry out the required review and provide a list of identified corrective amendments of this type to the Authority. As well as the contents of paragraph 48, the draft decision includes other issues in paras 46 and 47 which Western Power considers will be useful to contemplate in the document review.

It is expected that this work will be completed in the coming weeks, ready to be finalised prior to the release of an expected new version of the Technical Rules later this year.

If you have any queries in relation to these matters, please do not hesitate to contact Mr Lindsay Offer.

Yours sincerely



Margaret Pyrchla
Regulatory Compliance Manager

