

Market Advisory Committee

Minutes

Meeting No.	56
Location	IMO Board Room
	Level 17, Governor Stirling Tower, 197 St Georges Terrace, Perth
Date	Wednesday 12 December 2012
Time	2.00pm – 5.05pm

Attendees	Class	Comment
Allan Dawson	Chair	
Suzanne Frame	Compulsory - IMO	
Peter Mattner	Compulsory – Network Operator	
Brendan Clarke	Compulsory – System Management	Proxy
Andrew Everett	Compulsory –Electricity Generation Corporation	
John Rhodes	Compulsory –Electricity Retail Corporation	Proxy
Geoff Gaston	Discretionary – Generator	
Ben Tan	Discretionary – Generator	
Shane Cremin	Discretionary – Generator	
Steve Gould	Discretionary – Customer	
Nenad Ninkov	Discretionary – Customer	
Michael Zammit	Discretionary – Customer	
Geoff Down	Discretionary – Contestable Customer Representative	Proxy
Lisa Taylor	Minister's appointee - Observer	Proxy
Wana Yang	ERA - Observer	Arrived at 3.10 pm
Apologies	Class	Comment
Stephen MacLean	Compulsory –Electricity Retail Corporation	
Phil Kelloway	Compulsory – System Management	
Peter Huxtable	Discretionary – Contestable Customer Representative	
Nerea Ugarte	Minister's appointee - Observer	

David Murphy	Small Use Consumers' Representative	
Also in attendance	From	Comment
Natasha Cunningham	IMO	Minutes
Jenny Laidlaw	IMO	Presenter
Aditi Varma	IMO	Presenter
Greg Ruthven	IMO	Presenter
George Sproule	IMO	Observer
Cameron Parrotte	System Management	Observer
Alistair Craib	Collgar	Presenter
Miles Jupp	Collgar	Observer
Doug Aberle	Collgar	Observer
Elizabeth Walters	ERA	Observer
Tyson Self	ERA	Observer
Chin Koay	ERA	Observer Arrived at 3.10 pm
Andrew Sutherland	ERM Power	Observer Arrived at 2.10 pm
Andrew Stevens	Griffin Energy	Observer Arrived at 2.10 pm
Wayne Trumble	Griffin Energy	Observer

Item	Subject	Action
1.	WELCOME	
	The Chair opened the meeting at 2.00 pm and welcomed members to the 56th meeting of the Market Advisory Committee (MAC).	
2.	MEETING APOLOGIES / ATTENDANCE	
	The following apologies were received:	
	Nerea Ugarte (Minister's appointee - Observer)	
	Phil Kelloway (System Management)	
	Stephen MacLean (Compulsory – Electricity Retailer)	
	David Murphy (Small Use Consumers' Representative)	
	Peter Huxtable (Discretionary – Contestable Customer)	
	The following other attendees were noted:	
	Brendan Clarke (proxy for Phil Kelloway)	
	John Rhodes (proxy for Stephen MacLean)	
	Geoff Down (proxy for Peter Huxtable)	

- Lisa Taylor (proxy for Nerea Ugarte)
- Natasha Cunningham (minutes)
- Jenny Laidlaw (presenter)
- Aditi Varma (presenter)
- Greg Ruthven (presenter)
- George Sproule (observer)
- Alistair Craib (presenter)
- Cameron Parrotte (observer)
- Miles Jupp (observer)
- Doug Aberle (observer)
- Elizabeth Walters (observer)
- Tyson Self (observer)
- Chin Koay (observer)
- Andrew Sutherland (observer)
- Andrew Stevens (observer)
- Wayne Trumble (observer)

3. MINUTES OF PREVIOUS MEETING

The minutes of MAC Meeting No. 55, held on 14 November 2012, were circulated prior to the meeting.

The following amendments were agreed:

Page 13, Section 5e: PRC_2010_27: Ancillary Services Payment Equations

 "Mr Kelloway noted that the Market Rules for the Load Following standard do not cover ramping adjustments for Balancing Generators. Ms Laidlaw agreed that this was an existing problem with the Market Rules."

Page 13, Section 5e: PRC_2010_27: Ancillary Services Payment Equations

 "Mr Kelloway responded that such experimentation could pose a risk to system security and noted that if as a result of reducing LFAS there are interruptions variations to frequency then other services like Spinning Reserve will be need to be drawn upon."

Subject to the agreed amendments, the MAC endorsed the minutes as a true and accurate record of the meeting.

Action Point: The IMO to amend the minutes of Meeting No. 55 to reflect the agreed changes and publish on Market Web Site as final.

4. ACTIONS ARISING

The following comments were noted on the action items:

- Item 10: Mr Greg Ruthven advised that preliminary discussions had taken place between the IMO and the ERA (Economic Regulation Authority) and that a meeting had been planned for January 2013 involving the IMO, the ERA and the PUO (Public Utilities Office). Mr Ruthven noted that he would report back to the MAC in early 2013.
- **Items 11 and 29:** Mr Brendan Clarke advised that System Management would provide an update at the February 2013 MAC.
- **Item 40:** Mr Clarke advised that System Management circulated a copy of the interface specification and operating agreement for AGC and ABC to all Market Generators. Mr Ben Tan noted that he had not received a copy of the documentation.

Action Point: Mr Brendan Clarke to forward a copy of the interface specification and operating agreement for AGC and ABC to Mr Tan.

System Mgmt

- Item 45: Ms Suzanne Frame advised that this action had been completed and RC_2012_22 was to be submitted into the formal Rule Change Process.
- **Item 47:** Ms Frame advised that this item was underway, and an update would be provided in a presentation to the MAC relating to action items 47 and 48.
- Item 48: Mr Clarke advised that this action item was completed during discussion at the last market debrief. Mr Clarke noted that a 30 minute dispatch cycle was considered the most appropriate for the market at this stage, however this would be reviewed once more participants were on a business to business interface.
- Item 49: Ms Frame noted that System Management and the IMO had initiated a series of workshops relating to this issue. It was envisioned that these workshops would become weekly workshops between the IMO and System Management and the group will report back to the MAC on a regular basis.
- **Item 50:** Ms Frame advised that System Management would present an update on the 99% vs. 99.9% issue to the MAC.

5. PRESENTATION: Impact of Changes to the Allocation of Capacity Credits to Intermittent Generators

The Chair invited Mr Alistair Craib from Collgar Wind Farm to make his presentation. The following discussion points were noted:

• Mr Ruthven noted that the Reserve Capacity Requirement is essentially based on the premise of a one in ten year peak demand event and the allocation of Capacity Credits is centred on how much a Facility can contribute in meeting that requirement. Mr Ruthven noted that parameters used to establish the methodology were determined based on a trend analysis of wind farm performance vis-a-vis temperature increase. He noted that with Load for Scheduled Generation (LSG), peak demand and additional data if available, the same analysis would have occurred.

however there could have been potentially different parameter values which could have delivered that observed trend at higher temperatures. Mr Shane Cremin argued that the analysis done by Sapere Research Group was a subjective analysis to which Mr Ruthven agreed, noting that the SWIS had not experienced a one in ten year peak demand event. Mr Craib noted his agreement with Mr Ruthven but reiterated that the Sapere report did not include data from Collgar Wind Farm, and argued that the twelve intervals that the IMO used in its analyses may not necessarily be the only intervals which should be considered.

- The Chair responded that the IMO had requested Collgar data however the data provided was incomplete and could not be used to demonstrate Collgar's performance during peak intervals. Mr Craib advised that Collgar's actual generation data was not to hand at the presentation however would be provided should the methodology be reviewed.
- Mr John Rhodes queried the applicability of the Z-method to Collgar, noting that this methodology was considered to be more suitable when there are small increments in the amount of generation. Mr Rhodes considered the methodology may therefore be biased against Collgar due to its size. The Chair noted that there was a commitment to review the methodology in three years' time and questioned MAC members if there was any desire to bring that review forward within the first year of the 3-year transition. Mr Doug Aberle referred to the Zachary and Dent report where it recommends that once Intermittent Generator capacity approaches 330 MW, alternative methodologies should be considered and suggested that it may be appropriate to review the methodology on this basis.
- Mr Andrew Everett considered that if the methodology could be demonstrated to be patently unfair, than there might be grounds for re-evaluating the methodology.
- The Chair requested Collgar to provide its physical generation data demonstrating its performance during the 12 peak Trading Intervals for each of the five years that it had data for and present to the February 2013 MAC for consideration. The Chair noted that if it could be demonstrated from Collgar's output data that the methodology had materially disadvantaged Collgar relative to other Intermittent Generators during the peak periods, the MAC may advise the IMO to bring the review forward.

Action Point: Collgar Wind Farm to provide generation data demonstrating its performance during the 12 peak Trading Intervals for each of the past five years and present to the February 2013 MAC meeting for consideration.

Collgar

Action Point: Collgar to provide a revised copy of their presentation to the IMO so that the IMO can publish it on the Market Web Site.

Collgar/ IMO

6. PRESENTATION: 99% versus 99.9% standard

The Chair invited Mr Brendan Clarke to make his presentation. The following discussion points were noted:

Ms Jenny Laidlaw questioned how the ramping Load Following

requirements compared with Intermittent Generator Load Following requirements in terms of magnitude. Mr Cameron Parrotte responded that the estimate for Load Following required to support ramping was greater than 10 to 20 MW/min. Mr Andrew Sutherland noted that the impact of ramping on Load Following was due to the half hour design of the market, and subsequently would not be so much of a problem if the market was designed on five minute Dispatch Instructions. Mr Clarke concurred that the quantity of Load Following caused by ramping would be reduced in a five minute market; however the potential to cause Load Following would remain while the transition was not linear. In response to a query Mr Clarke advised that the wind generation during the sample Trading Intervals was about 20 MW.

- Discussion ensued on the requirement to maintain the normal frequency band for 99% of the time as specified in the Technical Rules.
- The Chair questioned whether there was a real desire to keep the frequency above 48.75 Hz and asked how many times over the last six years this had occurred. Mr Parrotte responded that since he had been at System Management, there had been approximately two or three incidents a year. Mr Parrotte further noted that these incidents could be caused by unreliability of large generators coupled with the frequency being away from the nominal 50Hz frequency due to load or unscheduled generation or unplanned scheduled generation movements.
- Mr Stevens questioned whether System Management could have maintained its frequency keeping performance for 99.9% of Trading Intervals with a different quantity of MW. Mr Clarke responded that System Management were looking at how they measured the actual MW requirement, but noted that this presentation was more about what level of service the market wanted.
- The Chair questioned Mr Parrotte on the effectiveness of System Management's wind forecasting tool. Mr Parrotte responded that forecasts for two out of three of the major wind farms in the BMO were very good and another was less so. In response to a query Mr Clarke confirmed that wind farms (including Collgar Wind Farm) had been subject to ramp rate limits in the Technical Rules since November or December 2011.
- Mr Stevens queried if there was a definition for Balancing Dispatch Instruction frequency. Mr Clarke responded that there was currently no definition and that the majority of generators get their Dispatch Instructions at the start of the Trading Interval. He also noted that marginal generators can get a Dispatch Instruction ten minutes past the Trading interval, at the start of the Trading Interval or at twenty minutes past the start of the Trading Interval.
- Mr Stevens questioned what quantity was required to reduce the Load Following capacity requirements in order to achieve some reduction. The Chair noted that it was not entirely clear how 99.0% was established in the Technical Rules, when it appeared that the market historically managed at 99.9%. Mr Clarke responded that the Access Code puts obligations on the Network Operator regarding frequency keeping and the premise is that there are no technical barriers to open access in the market. He further noted that the Market Rules imposed an implicit obligation on System

Management not to exceed the design of the network. Mr Nenad Ninkov queried whether other markets had relaxed their frequency variations to cope with the increase in Intermittent Generation in their systems and whether that would be pertinent for the SWIS. Mr Clarke responded that there were a number of options System Management were exploring to reduce the cost of Load Following.

- Mr Clarke noted that System Management is receiving feedback relating to costs as well as any commercial impacts from industry. He noted that System Management would undertake a consultation process with generators and end use customers and would consider initiating tests to ascertain what level of frequency variation might be acceptable. Mr Clarke advised the group that System Management was considering conducting trials in relaxing the frequency control in March/April 2013.
- Mr Rhodes noted that there had been a substantial increase in Load Following compared to previous years, which warranted System Management exploring alternative options. The Chair agreed with Mr Rhodes but noted his concern that there was significant variation between the historic level and the technical level. Mr Parrotte noted his concerns on security and service implications associated with this issue. He observed that relaxing the frequency could result in a security issue where customer Loads and generator machines would be experiencing greater wear and tear.
- Discussion ensued on the complexity in conducting a cost benefit analysis on this issue. Ms Laidlaw noted that it was hard to establish a price given the way the Load Following market works. She noted that the cost of Load Following provision depended on a number of factors such as which generator was on, what its start-up costs were, and what the Short Run Marginal Cost was. Mr Cremin noted that the Load Following costs were not allocated properly and it seemed that a potential solution might just redistribute the costs between Market Participants. Mr Michael Zammit noted that the reduction in Load Following requirement could be provided by Dispatchable Loads and that System Management should conduct some trials for that. Mr Clarke agreed that this was something that could be considered.
- Mr Parrotte also cautioned that performance in the SWIS was comparable to other jurisdictions, and noted that a reduction of the frequency standard could translate into system security risk, querying the group on whether there was an appetite to consider this risk. Members discussed the public consultation process and questioned whether it would produce meaningful answers on whether a change is needed, it was noted that the feedback process should focus on assessing what sort of costs would be imposed on different participants as a result of the reduction in the frequency standard. The Chair concluded by saying that if the level of LFAS places system security at risk, it was System Management's right and obligation to intervene.

Action Point: The IMO to publish System Management's presentation on the Market Web Site and circulate a copy to all MAC members.

7a. MARKET RULE CHANGE OVERVIEW

Ms Frame provided an update to the MAC on the current Rule Changes under development. Ms Frame noted that the Final Rule Change Report for the Transparency of Outage Information (RC 2012 11) had been extended due to the significant implementation cost and time frames identified by System Management during the second submission period. Ms Frame noted that these costs were unavailable during the first submission period and had only recently become available to the IMO. Ms Frame considered that in light of the impact of these implementation costs and time frames the IMO had engaged in a series of workshops with System Management to identify what was already captured in SMMITS to ascertain how best to achieve progress in outage transparency within a suitable time frame and at an acceptable cost. Ms Frame advised that the time frame for the publication of the Final Rule Change Report had therefore been extended to allow the IMO and System Management to conclude their discussions and conduct a round of further consultation if required on a revised proposal.

Ms Frame advised the MAC that there had been one high priority rule change issue logged in November which was discussed at the November 2012 MAC meeting, and on the advice of the MAC had been progressed into a Fast Track Pre Rule Change Proposal which was on the MAC agenda for discussion that day. Ms Frame also noted that there were a couple of new medium priority issues on the issue log which Ms Laidlaw would speak to.

Ms Laidlaw provided an overview of the two medium priority rule change issues.

The first issue related to System Management's obligation under clause 7.2.3A to give the IMO a file every scheduling day on the quantity of Ancillary Services which might be provided by a Market Participant. Ms Laidlaw commented that as it currently stood, Verve Energy was the main Market Participant providing Load Following Ancillary Service. With the new Load Following market arrangements, other Independent Power Producers (IPPs) could also provide Load Following; however, System Management would not know on the Scheduling Day which Facilities would provide LFAS and what quantities would be nominated. This implied that System Management would be forced to submit on the Scheduling Day the entire capacity of an IPP as providing Load Following. This in turn would restrict the amount of capacity that the IPP bids into STEM which could produce perverse consequences such as steep increases in the STEM prices.

The second issue was related to the definition of the Minimum Frequency Keeping Capacity, particularly that the calculated figure according to clause 3.10.1a(ii) (35 MW) referred to in the determination of the Reserve Capacity Target, did not seem to be consistent with the Load Following requirement submitted by System Management (90 MW). Ms Laidlaw noted that the Reserve Capacity Target should ideally be based on a reasonable estimate of the Load Following requirement. At present the Load Following requirement used in the determination of the RCT is based on the calculation in clause 3.10.1, which might not be the actual reasonable estimate of the LF requirement.

Action Point: The IMO to develop Pre Rule Change Proposals on

• the impact of clause 7.2.3A on IPP LFAS Facilities; and

	 the definition and usage of Minimum Frequency Keeping Capacity. 	
7b	PRC_2012_20: Consideration of Network Constraints for Certified Reserve Capacity	
	Mr Ruthven presented an overview of the IMO's Pre Rule Change Proposal: Consideration of Network Constraints for Certified Reserve Capacity (PRC_2012_20).	
	The following points were raised during the ensuing discussion:	
	 Mr Rhodes queried what process the IMO employed in allocating Capacity Credits to two Facilities sharing the same connection point. Mr Ruthven responded that he was not sure if the IMO could envisage all scenarios at this point of time. 	
	 Mr Wayne Trumble questioned whether this issue was borne out of the network operator overselling connections. Mr Ruthven replied that it is possible for a generator to have more capacity that that nominated in the declared sent out capacity (DSOC) at its connection point. 	
	 Mr Everett noted that he could not see how the current situation imposed any security or reliability issues to the SWIS. Mr Everett further noted that he believed having a greater quantity 'sitting behind' a DSOC would in fact be more conducive to maintain system reliability. 	
	 Mr Geoff Gaston discussed the whether the parties involved in sharing the DSOC could initiate their own commercial arrangements with each other and provide that information to the IMO. Discussion ensued and it was agreed that this was implicit in the network agreement entered into by the parties. 	
	The MAC agreed for the IMO to progress PRC_2012_20.	
	Action Point: The IMO to formally submit the Pre Rule Change Proposal: Consideration of Network Constraints for Certified Reserve Capacity (PRC_2012_20) into the formal Rule Change Process.	IMO
7с	PRC_2012_24: Cure Notices and Credit Support	
	Ms Aditi Varma presented an overview of the IMO's Pre Rule Change Proposal: Cure Notices and Credit Support (PRC_2012_24).	
	The following points were raised during the ensuing discussion:	
	 Mr Cremin questioned if there was a stipulated timeframe that the IMO followed in issuing a Cure Notice. Ms Varma responded that the IMO would normally start the process of issuing a Cure Notice and drawing upon Credit Support as soon as the payment defaulted is identified. 	
	The Chair noted that it as it currently stood, the Market Rules do not afford the IMO any discretion around the activities related to Suspension Events and that this Rule Change Proposal will enable the IMO to avoid preparing Cure Notices and drawing upon Credit Support until the IMO has confirmed it is a definite default.	

	The MAC agreed for the IMO to progress PRC_2012_24.	IMO
	Action Point: The IMO to formally submit the Pre Rule Change Proposal: Cure Notices and Credit Support (PRC_2012_24) into the Formal Rule Change Process	
7d	PRC_2012_25: Constrained On/Off Compensation Removal where a Facility is non-compliant with Dispatch Instructions	
	Ms Frame presented an overview of the IMO's Pre Rule Change Proposal: Constrained On/Off Compensation Removal where a Facility is Non-compliant with Dispatch Instructions (PRC_2012_25).	
	The following points were raised during the ensuing discussion:	
	• Mr Stevens queried whether the Theoretical Energy Schedule (TES) can currently be re-calculated as he believed that Verve Energy had proposed a rule change around this issue, noting that the two issues were related. Ms Frame confirmed that Verve previously raised an issue relating to the recalculation of TES, which had now been incorporated into a broader issue around the Adjustment Process. Ms Frame agreed that the issues were related, however noted that the issue that PRC_2012_25 sought to resolve was considered at the November MAC meeting and agreed by the MAC to constitute a manifest error, while the issue around the recalculation of TES would most likely be required to be processed through the Standard Rule Change process, hence it was decided to progress the issues separately.	
	The MAC agreed for the IMO to progress PRC_2012_25.	
	Action Point: The IMO to formally submit the Pre Rule Change Proposal: Constrained On/Off Compensation Removal where a Facility is non-compliant with Dispatch Instructions (PRC_2012_25) and progress the proposal using the Fast Track Rule Change Process.	IMO
8a.	MARKET PROCEDURE CHANGE OVERVIEW	
	Ms Frame informed the MAC that an IMO Procedure Change and Development Working Group meeting was held on 27 November 2012. Ms Frame noted that the Market Procedure for Determining Loss Factors was presented at this meeting.	
9a.	WORKING GROUP OVERVIEW	
	Ms Frame sought MAC approval for Mr Brendan Clarke to replace Ms Grace Tan as System Management's representative and to remove Ms Fiona Edmonds as the IMO representative on both the System Management Procedures Working Group and the IMO Procedure Change and Development Working Group.	
	The MAC approved the changes to the Working Groups.	
	Action Point: The IMO to update the Working Group memberships in accordance with MAC approval.	IMO
9b.	RCMWG UPDATE	
	Ms Frame reported that the last Reserve Capacity Mechanism Working Group (RCMWG) was held on 22 November 2012. Ms Frame noted that the Working Group remained inconclusive in their deliberations on some	

of the finer aspects of the Reserve Capacity Price (RCP) formula recommendations in particular. Ms Frame advised the MAC that the IMO had consolidated the aspects of the proposals that had been agreed to for each work stream as well as identifying the aspects which remained outstanding and would present the resulting report to the IMO Board at the December 2012 meeting, in line with the agreed reporting deadline.

Ms Frame advised that the outcome of the IMO Board's deliberations on the RCMWG report would be presented to the MAC at the February 2013 MAC meeting where the MAC would discuss next steps.

Ms Frame requested working group members for their feedback on the proposed RCP formula before the IMO Board at December 2012 Board Meeting, noting that the request was for an indication of the level of support for the proposal and did not constitute a formal acceptance.

10. 2012 YEAR IN REVIEW

Ms Frame noted the 2012 Year in Review and highlighted the number of large pieces of work that had been undertaken in 2012, including the implementation of the Competitive Balancing and Load Following Markets, progressing the recommendations from the Outage Planning Review, and the significant work undertaken by the RCMWG in considering the issues and recommendations of the RCM Review. The Chair congratulated the MAC on the hard work and effort contributed by MAC and RCMWG members over the year.

The MAC noted the proposed MAC Meeting Dates for 2013.

11. GENERAL BUSINESS

Dr Steve Gould requested clarification on the confidentiality status relating to the Notional Wholesale Meter and requested this information to be made publicly available. Mr Rhodes noted his concerns that making this information public might reveal Synergy's position. The Chair requested that the IMO write to the PUO to ascertain which organisation would be responsible for making this available. He noted that if it was found that the PUO were not responsible for this information, the MAC would further clarify this issue on disclosure and whether the information should be made public in the interests of Market Participants.

Ms Frame informed the MAC that the IMO had given further consideration an issue related to RC_2012_19 raised initially by Mr Geoff Gaston at the November MAC meeting, and subsequently by Alinta in its submission. The issue related to the IMO's decision to breach the Market Rules in order to prevent perverse market settlement outcomes in the case of two Intermittent Generators.

Ms Frame clarified that after internal discussion, the IMO reviewed the issue and has extended its decision to apply to all spurious Constrained On/Off Compensation that has been allocated to Non-Scheduled Generators due to the manifest error addressed in RC_2012_19. Ms Frame advised that the IMO would report back to the MAC in February 2013 on the impacts of these adjustments.

Action Point: The IMO to contact the PUO to seek clarification and advice on the Metering Code and the confidentiality status of data

captured by Notional Whol	lesale Meters.
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Action Point: The IMO to report back to the MAC at its February 2013 meeting on the impact of extending its decision to apply to all spurious Constrained On/Off Compensation that has been allocated to Non-Scheduled Generators due to the manifest error addressed in RC_2012_19

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CLOSED: The Chair declared the meeting closed at 5.05 pm.