



August MAC: Agenda Item 5a

Concept Paper 2013_04: Outage
Planning Phase 2 – Outage Process
Refinements

Background and progress to date:

- 2011 Outage Planning Process Review
- PA Consulting - Final Report published October 2011
- Phase 1: Outage Transparency commences 1 October 2013
- Additional issues/recommendations identified by MAC/SM/IMO/ERA
- Some recommendations implemented or in progress
- Phase 2 deals with:
 - Technical changes to the outage planning process, to provide greater flexibility
 - Clarification of the obligations on Rule Participants around the outage planning process

Timelines for Opportunistic Maintenance requests:

- Retain distinction between Scheduled Outages and Opportunistic Maintenance (24 hour limit)
- IMO proposes to amend Market Rules to allow:
 - Requests to be submitted between 10:00am on Scheduling Day and start of Trading Day
 - Requests to be for any period up to 24 hours, can span Trading Days
- No changes to System Management resourcing
- Approval to remain “as soon as practicable” in Market Rules
- System Management to update approval timelines in PSOP

Outages and Balancing Submissions:

- ODOM “must not require any changes to scheduled energy or ancillary services”
- IPP dispatch now based on BMO, not Resource Plans
- Aim to:
 - Maximise Forecast BMO accuracy
 - Avoid SM needing to exercise discretion
- IMO proposes:
 - Capacity subject to a Planned Outage request must be bid as unavailable in Balancing
 - SM must not approve request if capacity available in BMO
 - If request rejected, participant must make capacity available in Balancing or log a Forced Outage

Opportunistic Maintenance request deadline options:

- Continue with current 1 hour request limit – participant to manage risks
- Set deadline for approving requests of at least 30 minutes before Balancing Gate Closure:
 - Time to amend Balancing Submission before Balancing Gate Closure
 - Currently 2.5 hours before start of outage
- Set deadline for approving requests of at least 1 hour before Balancing Gate Closure:
 - Time to amend Balancing Submission and for others to see/respond
 - Currently 3 hours before start of outage
- IMO seeking MAC's views

Advanced approval of Scheduled Outages:

- PA Consulting recommendation:
 - *“System Management should consider amendments to the PSOP: Facility Outages and, if necessary, the Market Rules, to allow a limited number of advanced-approval outages per Facility per year”*
- IMO not convinced changes are justified:
 - SM cannot guarantee approved outage will proceed
 - Strict rules governing rejection of accepted or approved outages
 - Outage transparency changes
 - Problem appears to be extremely rare
 - Changes to compensation regime would socialise risks – benefits to Wholesale Market Objectives unclear
- No changes proposed

Criteria for approval of Planned Outages - proposal:

- Request for approval of a Planned Outage deemed to be a declaration of the participant's "good faith expectation" that the relevant capacity would otherwise be available for dispatch for the duration of the outage
- Two exceptions:
 - Outage is timed to align with a network outage
 - Extensions of Scheduled Outages (no limit for now, but to be monitored)
- Usually no need for written availability declarations

Criteria for approval of Planned Outages (continued):

- Forced Outage after Planned Outage approved would not affect status of the Planned Outage
- Forced Outage while System Management considering approval request:
 - Participant should cancel if “declaration” no longer holds
 - System Management may seek clarification of availability
- System Management able to reject a Planned Outage (Scheduled Outage or Opportunistic Maintenance) if it considers:
 - Outage not requested to undertake maintenance; or
 - De-rated capacity would not otherwise be available for dispatch for the duration of the outage

Obligations - DSPs and Associated Loads:

- A DSP not consuming at its Relevant Demand level is not undergoing an “outage” (may be an issue to be considered, but outage framework inappropriate)
- A DSP should not be eligible to take a Planned Outage
- DSP aggregators unlikely to volunteer intention not to comply with Dispatch Instructions
- No need to include DSPs or their Associated Loads in the Equipment List

Obligations – transmission network equipment:

- Use logical “SWIS circuits” rather than individual equipment assets
- System Management to define and develop naming convention (in conjunction with other Rule Participants)
- IMO proposes to amend clause 3.18.2(c)(i) to require the Equipment List to include “*all transmission circuits that could limit the output of a Scheduled Generator, Non-Scheduled Generator or generation system to which clause 3.18.2A relates*”

Obligations – distribution network equipment:

- IMO proposes:
 - Standard processes for any proposed outage of the distribution system that would limit the output of a generator on the Equipment List
 - Conceptual distribution system “circuit” for each generator?
 - Network Operator required to give Market Participant and SM at least three Business Days’ notice of a proposed outage that will limit the output of a market generator **not** on the Equipment List
- What should be the requirement to report a Forced Outage of the distribution system affecting:
 - Market generators on the Equipment List?
 - Market generators not on the Equipment List?

Other proposals:

- Clarify the requirement to follow the outage scheduling process before making capacity unavailable to perform discretionary maintenance
- Clarify the requirement to inform System Management of a Forced Outage or Consequential Outage as soon as practicable, may be before the start of the outage
- Minor amendments

Next steps:

- Continue working with SM to clarify details and IT costings
- Prepare a Pre Rule Change Proposal for October 2013 MAC