

## Minutes

<b>Meeting Title:</b>	RC_2013_15: Outage Planning Phase 2 – Outage Process Refinements - Availability Declaration Workshop
<b>Date:</b>	7 November 2018
<b>Time:</b>	9:05 AM – 11:00 AM
<b>Location:</b>	Pods 1 and 2, Albert Facey House 469 Wellington Street, Perth

<b>Attendees</b>	<b>Class</b>	<b>Comment</b>
Jenny Laidlaw	RCP Support	
Stephen Eliot	RCP Support	
Laura Koziol	RCP Support	
Jake Flynn	Economic Regulation Authority	
Leon Kwek	Australian Energy Market Operator (AEMO)	
Teresa Smit	AEMO	
Kei Sukmadjaja	Western Power	
Wendy Ng	Market Generators (ERM Power)	
Oscar Carlberg	Synergy	
Paul Arias	Bluewaters Power	
Adam Stephen	Alinta Energy	

<b>Slide</b>	<b>Subject</b>	<b>Action</b>
<b>4-5</b>	<b>Outage planning objectives and assessment factors</b> Attendees raised no concerns about the outage planning objectives and Rule Change Proposal assessment factors listed in slides 4 and 5 of the workshop discussion notes.	
<b>6-8</b>	<b>Workshop terminology</b> Ms Jenny Laidlaw noted that the definition of ‘available for dispatch’ required further consideration, as it was possible that capacity that was not assigned Capacity Credits would be allowed to be declared as unavailable in a Balancing Submission without being on an Outage. In response to a question from Ms Wendy Ng, Ms Laidlaw and Ms Laura Koziol clarified that the question of whether capacity without Capacity Credits should be allowed to be bid as unavailable in Balancing Submissions	

	<p>without being on an Outage would be part of the call for further submissions.</p> <p>Mr Paul Arias noted that currently, if a Facility is undertaking a Commissioning Test, the total capacity of that Facility is affected by the Commissioning Test, because there is no option for it to apply only to part of the capacity. Ms Laidlaw agreed to consider this issue as part of the assessment of RC_2013_15.</p>	
<b>9-11</b>	<p><b>RC_2013_15 – Issue 13 changes</b></p> <p>Mr Adam Stephen sought clarification about how Scheduled Outages that were approved with conditions would be treated if any of their Outage Plan details changed. Ms Laidlaw replied that the Market Rules did not provide for a Scheduled Outage to be approved with conditions. There was some discussion about the concept of accepting and approving Planned Outages with conditions.</p> <p>Ms Laidlaw clarified that the broader criteria for acceptance and approval of Planned Outages were out of the scope for RC_2013_15.</p>	
<b>12</b>	<p><b>Issues affecting original proposal (1)</b></p> <p>Attendees agreed that AEMO’s interpretation of the term ‘removal from service’<sup>1</sup> leads to outcomes that conflict with the intent of RC_2013_15.</p>	
<b>13</b>	<p><b>Issues affecting original proposal (2)</b></p> <p>Attendees agreed that there should be an explicit requirement in the Market Rules for participants to update an Outage Plan if any of the relevant details changed.</p> <p>Mr Arias suggested that SMMITS might not allow changes to an Outage Plan after it was approved. Ms Laidlaw replied that if this was the case, then in the short term participants might need to use an alternative method to notify System Management of post-approval changes, to avoid delaying the implementation of the proposal.</p> <p>Attendees agreed that clarification is needed on which changes to an Outage Plan should cause it to be considered a new Outage Plan that needs to be reassessed and re-prioritised.</p>	
<b>14</b>	<p><b>Expected solution</b></p> <p>Ms Laidlaw noted that the expected solutions listed in slide 14 had not yet been approved by the Rule Change Panel.</p> <p>Attendees generally supported the expected additional changes to the proposed Amending Rules for RC_2013_15.</p> <p>Ms Ng suggested that a participant should be able to shift the timing of a Planned Outage without it losing its priority, if the</p>	

<sup>1</sup> Which is based on AEMO’s interpretation of the 13 April 2017 WA Supreme Court decision on Bluewaters Power 2 Pty Ltd –v- Australian Energy Market Operator Ltd [2017] WASC 98.

	<p>change was not significant. Mr Leon Kwek replied that if a shift in the timing of a Scheduled Outage led to a conflict with another Scheduled Outage, then the modified Scheduled Outage should have the lower priority. Mr Arias noted that this approach could lead to participants requesting longer Scheduled Outages than they needed, to avoid running out of time. Mr Kwek considered this would still be the preferred outcome.</p> <p>Attendees did not identify any additional changes to an outage request that should cause the request to be treated as a new outage request.</p>	
<b>17</b>	<p><b>Availability requirement – straw man</b></p> <p>Mr Arias noted that in some cases a Facility needs a Planned Outage to fix a problem, but the Facility can be operated in a way that allows it to be dispatched despite that problem, e.g. a Facility is losing water due to a leak that needs an Outage to repair, but the Facility can still be operated if water is trucked in. Ms Laidlaw noted that as long the relevant capacity could be dispatched and made available in the Balancing Market, the availability requirement would be fulfilled and the participant could request a Planned Outage.</p> <p>Mr Oscar Carlberg sought clarification on how the new proposed availability requirement would apply to the extension of a Planned Outage. Ms Laidlaw replied that extension outages would be exempt from the availability requirement as long as they did not follow an availability-challenged Planned Outage.</p> <p>Ms Ng noted that a Planned Outage to investigate a potential issue might identify a major problem that requires an extension to address. The original Planned Outage might fulfil the availability requirement and then the request for the extension outage should be exempt from the availability requirement. Ms Laidlaw clarified that there was likely to be a need for a good faith requirement that the period for which a Planned Outage is requested should not be unrealistically short given the information available to the participant about the work that needs to be undertaken.</p>	
<b>18</b>	<p><b>Availability requirement scenarios</b></p> <p>Attendees did not suggest any additional scenarios for consideration.</p> <p>Ms Ng raised a concern that the on-site staff who requested Planned Outages would be focussed on the maintenance of the Facility and may not necessarily take the availability requirement into account. Ms Laidlaw noted that the straw man availability requirement provided a simpler test than the one originally proposed in RC_2013_15. Ms Ng agreed that the staff education process could be managed.</p> <p>Attendees were generally supportive of the straw man availability requirement and agreed it would be easier to apply than the one proposed in RC_2013_15.</p>	

20	<p><b>Lock-in of Scheduled Outage - straw man</b></p> <p>Ms Laidlaw clarified that, if a Planned Outage became an availability-challenged Planned Outage, the requirements for any extensions to that Planned Outage would be stricter than for Planned Outages that are not availability-challenged.</p>	
21	<p><b>Lock-in of Scheduled Outage scenarios (1)</b></p> <p>In response to a question from Ms Teresa Smit, Ms Laidlaw clarified that if an availability-challenged Planned Outage was rejected for some other reason after it was accepted, then the participant would need to report a Forced Outage.</p> <p>Attendees supported the straw man proposal to change the 'lock-in' point for a Scheduled Outage (i.e. the point in time after which the outage request does not have to be withdrawn/rejected if it ceases to meet the availability requirement) from the time of approval to the time of first acceptance and inclusion in the outage schedule.</p>	
23	<p><b>Starting Scheduled Outages early (1)</b></p> <p>Attendees agreed that an Opportunistic Maintenance outage should be allowed to precede a Scheduled Outage.</p> <p>Mr Arias asked whether the original intention of RC_2013_15 was to prevent Opportunistic Maintenance from directly preceding a Scheduled Outage. Ms Laidlaw clarified that under the current drafting of RC_2013_15, the approval of the Opportunistic Maintenance request could be interpreted as causing the Scheduled Outage to become availability-challenged. Attendees agreed that the proposed Amending Rules should be clarified to avoid this interpretation.</p>	
26-29	<p><b>Disingenuous requests – straw man</b></p> <p>Mr Stephen sought clarification on what form of evidence would need to be provided to AEMO to show that capacity was capable of being made available for dispatch prior to the start of a Planned Outage. Mr Kwek replied that this could, for example, be a consultant's report.</p> <p>Mr Arias raised a concern that AEMO might be overly conservative in its assessment of evidence so that Planned Outages are never approved while a Facility is on a Forced Outage. Ms Ng agreed with Mr Arias, and noted that it was hard to assess whether the evidence could be delivered, as it was unclear what kind of evidence AEMO would require.</p> <p>Ms Laidlaw sought suggestions from attendees about how the requirements for evidence can be specified to provide more clarity. Attendees did not provide specific suggestions at the workshop, although Ms Smit suggested that a report from an external party may be required.</p>	

	<p>Attendees agreed that the evidence requirements should be detailed in the Power System Operation Procedure (<b>PSOP</b>): Facility Outages.</p> <p>Attendees raised no other concerns about the straw man proposal to address concerns about disingenuous Planned Outage requests.</p>	
<b>30</b>	<p><b>Availability requirements for non-generator Equipment List Facilities</b></p> <p>There was general agreement that the proposed availability requirements could also be applied to non-generator Equipment List Facilities such as items of network equipment, provided that a suitable alternative to the term 'available for dispatch' was used for these facilities.</p> <p>There was some discussion about what term would be appropriate for network equipment. Ms Kei Sukmadjaja noted that during AEMO's recent workshop on the PSOP: Facility Outages, Western Power proposed that an Outage Plan should be deemed to be valid if the relevant network equipment was capable of being energised. This suggestion had been incorporated into the draft PSOP for the Procedure Change Proposal AEPC_2018_04: Facility Outages.</p> <p>Ms Laidlaw considered the term 'capable of being energised' would not be suitable because an item of network equipment can be partially de-rated but still be capable of being energised. Such de-ratings were subject to the normal outage scheduling and reporting requirements. Ms Laidlaw suggested that 'available for service' might be a suitable term for network equipment and sought feedback from Western Power and AEMO on this question.</p>	
<b>31</b>	<p><b>Next steps</b></p> <p>Ms Laidlaw asked attendees how long the submission window should be open for the call for further submissions. Attendees agreed that three weeks would be sufficient.</p>	

**The workshop ended at 11:00 AM.**