

Minutes

Meeting Title:	RC_2013_15 (Outage Planning Phase 2 - Outage Process Refinements) Workshop
Date:	17 September 2018
Time:	1:00 PM – 3:20 PM
Location:	Training Room 2, Albert Facey House 469 Wellington Street, Perth

Attendees	Class	Comment
Jenny Laidlaw	RCP Support	
Stephen Eliot	RCP Support	
Laura Koziol	RCP Support	
Jake Flynn	Economic Regulation Authority (ERA)	
Matthew Fairclough	Australian Energy Market Operator (AEMO)	
Clayton James	AEMO	
Winston Cheng	AEMO	
Leon Kwek	AEMO	
Oscar Carlberg	Synergy	
Wendy Ng	Market Generators (ERM Power)	
Kei Sukmadjaja	Western Power	
Dean Frost	Western Power	
Paul Arias	Bluewaters Power	
Adam Stephen	Alinta Energy	
Patrick Peake	Market Customers (Perth Energy)	
Jacinda Papps	Market Generators (Alinta Energy)	

Slide	Subject	Action
3	Obligations to participate in outage planning process (1) Attendees raised no concerns about the RC_2013_15 proposal to remove the requirement for Demand Side Programmes, Dispatchable Loads and Interruptible Loads with Capacity Credits to be included on the Equipment List.	

	<p>In relation to issue 2, Mr Dean Frost noted that Western Power would like to discuss options to implement sustainably efficient processes and systems to provide the required information to AEMO, given the likely future increase in distribution-connected facilities. Mr Clayton James noted that the proposed change was very broad and should allow AEMO and Western Power to define the most appropriate process to capture the required information.</p> <p>Mr Frost indicated that capturing the information would come at a cost for Western Power and take time to implement. Ms Jenny Laidlaw noted that in discussions with the Independent Market Operator (IMO) in 2013-14, Western Power had agreed that the changes could be implemented quickly and inexpensively using existing systems for the current small number of distribution-connected Generators.</p> <p>Attendees agreed that Western Power, AEMO and RCP Support should discuss these issues outside of the workshop.</p>	
4	<p>Obligations to participate in Outage Planning process (2)</p> <p>Attendees raised no concerns about the RC_2013_15 proposal to clarify the obligations to request Planned Outages for Equipment List Facilities and to report Planned Outages for Small Outage Facilities.</p> <p>Attendees agreed that Scheduled Generators with a nameplate capacity less than 10 MW should have to be on the Equipment List if they hold Capacity Credits.</p> <p>Attendees also supported additional changes to introduce a materiality threshold for the requirement to log Outages for Non-Scheduled Generators. Mr James noted that the appropriate threshold might vary depending on the technology of the Facility, so it might be useful to allow some flexibility in the threshold definition, e.g. by locating the definition in a Power System Operation Procedure (PSOP). Ms Laidlaw suggesting discussing the options for defining such a threshold further with AEMO outside of the workshop.</p> <p>Mr James sought clarification on whether Outages for Small Outage Facilities would still be reported on AEMO's website. Ms Laidlaw confirmed that this was the intention.</p>	
5	<p>Planned Outages and Balancing Submissions (1)</p> <p>Attendees agreed that unavailable capacity details were not required in Balancing Submissions for Non-Scheduled Generators and that the proposed introduction of such a requirement in RC_2013_15 should be rejected.</p>	
6	<p>Planned Outages and Balancing Submissions (2)</p> <p>Attendees agreed that the deadline for approving Opportunistic Maintenance should be set to 30 minutes before Balancing Gate</p>	

	<p>Closure for the Trading Interval in which the Outage is due to commence, as proposed in RC_2013_15.</p> <p>Attendees agreed that the Market Rules should not specify a deadline for requesting Opportunistic Maintenance.</p> <p>There was discussion about whether the request and approval of Opportunistic Maintenance via phone should be permitted. Ms Laidlaw noted that it was more difficult to assess compliance for requests made and approved by phone. Mr James noted that details of outage requests made by phone might not be published on AEMO's website in a timely manner.</p> <p>Attendees raised no concerns about the proposal in RC_2013_15 to deem a request for Opportunistic Maintenance to be rejected if System Management has not made a decision on the request by the approval deadline.</p>	
<p>7-9</p>	<p>Planned Outages and Balancing Submissions (3 to 5)</p> <p>There was discussion about the proposed requirements for reporting capacity that is subject to Planned Outage requests in Balancing Submissions, and about the interpretation of clause 3.19.2(b)(ii) since the implementation of the Balancing Market.</p> <p>Attendees agreed that Market Participants should be allowed to undertake Commissioning Tests during a Planned Outage, and that an additional change should be included in RC_2013_15 to clarify this in the Market Rules.</p> <p>Attendees raised no concerns about the requirements in proposed new clause 7A.2A.1 for the logging of a Forced or Consequential Outage for capacity declared unavailable in a Balancing Submission.</p> <p>There was discussion about whether a Market Generator should be obliged to request or report an Outage if it is not undertaking maintenance on its Scheduled Generator but does not wish to offer some or all of the Facility's capacity that is not associated with Capacity Credits into the Balancing Market.</p> <p>Mr James indicated that AEMO used information about the availability of capacity that is not subject to Capacity Credits in its system planning functions. There was some discussion about whether AEMO should take the availability of generator capacity that is not subject to Reserve Capacity Obligations into account in determining reserve margins and making decisions on Planned Outage Approvals. Attendees agreed that RCP Support and AEMO should discuss this issue further outside the workshop, and that the issue should be raised in the call for further submissions.</p> <p>There was discussion about whether Planned Outages should include start-up times to cover the complete time until a Facility could be synchronised.</p> <p>Attendees agreed that if System Management rejects or recalls a generator Planned Outage, it should be able to direct the</p>	

	<p>Market Generator to return the relevant capacity to the Balancing Market as soon as practicable, even if this is after Balancing Gate Closure. If this occurs then attendees agreed that the Market Generator should not be required to provide any subsequent notification to System Management to explain the late Balancing Submission.</p>	
10	<p>Planned Outages and Balancing Submissions (6)</p> <p>Attendees raised no concerns about the clarifications proposed in RC_2013_15 about Synergy's obligations relating to the representation of capacity that is subject to Planned Outage requests in Balancing Submissions for the Balancing Portfolio.</p>	
11	<p>Timelines for Planned Outages</p> <p>Ms Laidlaw noted that progression of the proposed changes to Outage Planning timelines was dependent on whether and when changes could be made to SMMITS. Ms Laidlaw noted that, as the proposed changes were comparatively small validation changes, the preferred option would be to commence them before the start of the System Management System Transfer (SMST) project. If that was not possible, the alternative would be to delay commencement for those changes to a time after the completion of the SMST project.</p> <p>Attendees raised no concerns about the proposed clarification in RC_2013_15 that the deadline for submission of a Scheduled Outage approval request is 10:00 AM on the day two days prior to the Trading Day on which the outage is due to commence (TD-2).</p> <p>Attendees raised no concerns about allowing Opportunistic Maintenance requests to be for any period up to 24 hours in length, as proposed in RC_2013_15.</p>	
12	<p>Timelines for Planned Outages (2)</p> <p>Attendees raised no concerns about the proposed changes to the timelines for requesting Opportunistic Maintenance in RC_2013_15.</p> <p>There was discussion about whether any further prescription or guidance should be included in the Market Rules around the practical application of clause 3.19.4, which requires System Management to approve or reject a Planned Outage request and inform the relevant participant as soon as practicable.</p> <p>Mr Matthew Fairclough and Mr James noted that AEMO intended to continue to include additional deadlines for the approval or rejection of Opportunistic Maintenance requests that are submitted within particular timeframes in the PSOP: Facility Outages.</p> <p>Attendees agreed that more specific deadlines should not be included in the Market Rules, but offered several other suggestions, including an extension of the heads of power for</p>	

	<p>the PSOP to include a requirement for additional detail about the application of clause 3.19.4. Attendees agreed that this question should be included in the call for further submissions for RC_2013_15.</p>	
13	<p>Timelines for Planned Outages (3)</p> <p>Attendees raised no concerns about the inclusion of a requirement for a 24 hour period to elapse between the end of one Opportunistic Maintenance outage for an Equipment List Facility and the start of the next, as proposed in RC_2013_15. Mr Fairclough suggested that the obligation should be on the Rule Participant to not submit Opportunistic Maintenance requests that are less than 24 hours apart, rather than on AEMO to reject such requests.</p> <p>Attendees raised no concerns about the proposed changes to clause 3.18.2A to:</p> <ul style="list-style-type: none"> align the notification deadlines for Planned Outages of Small Outage Facilities with the approval request deadlines for Planned Outages of corresponding duration for Equipment List Facilities; and clarify that a Market Participant must notify System Management if the timing of an outage changes or the outage is no longer required. 	
14	<p>Timelines for Planned Outages (4)</p> <p>Attendees agreed that the deadline proposed in RC_2013_15 for approving Planned Outages (30 minutes before Balancing Gate Closure for the first Trading Interval of the outage) does not leave Market Generators sufficient time to make the necessary arrangements for commencing a Scheduled Outage. Attendees agreed that 2:00 PM on TD-2 was an appropriate deadline for System Management to approve Scheduled Outages.</p> <p>Attendees did not consider that any change was needed to the deadline proposed in RC_2013_15 for the submission of approval requests for Scheduled Outages (i.e. 10:00 AM on TD-2).</p>	
15	<p>Issue 13: Availability declarations (1)</p> <p>There was discussion about:</p> <ul style="list-style-type: none"> whether the availability requirement as proposed in RC_2013_15 would produce efficient outcomes, or if it should be changed to prohibit a participant from requesting a Planned Outage if it is aware that, if System Management rejected the request, the capacity would not be available for dispatch for the duration of the Planned Outage; whether availability declarations should apply to Scheduled Outage requests or requests for Scheduled Outage approvals, and until what stage in the process should a 	

	<p>request be withdrawn or rejected because of a change to the Facility's ability to meet the availability requirement;</p> <ul style="list-style-type: none"> • how availability declarations should be applied to requests for Planned Outages that are de facto extensions of existing Planned Outages; and • whether there should be a limit to how long a Planned Outage can be extended. <p>Attendees agreed that another workshop should be held to consider options for the provisions relating to availability declarations by comparing their outcomes for a range of outage planning scenarios.</p> <p>Mr Fairclough noted a potential drafting inconsistency between proposed clauses 3.19.1 and 3.19.2B. Ms Laidlaw agreed that clause 3.19.1 may need to be made subject to clause 3.19.2B.</p> <p>Action: RCP Support and AEMO to prepare and schedule a workshop to discuss the options relating to availability declarations.</p>	RCP Support and AEMO
16	<p>Issue 13: Availability declarations (2)</p> <p>Ms Laidlaw noted that:</p> <ul style="list-style-type: none"> • the treatment of availability declarations for notifications of Planned Outages for Small Outage Facilities; and • the introduction of a requirement to withdraw an outage request if the Facility no longer meets the availability declaration requirement <p>would depend on the outcomes of the proposed workshop on availability declarations.</p>	
17	<p>Issue 13: Availability declarations (3)</p> <p>Ms Laidlaw noted that the availability requirements for a Planned Outage that immediately follows a Scheduled Outage would depend on the outcomes of the workshop on availability declarations.</p> <p>Attendees raised no concerns about the concept that an availability declaration would not be necessary for Trading Intervals where a Facility was expected to be subject to a Consequential Outage, as proposed in RC_2013_15.</p> <p>Attendees raised no concerns about allowing System Management to reject a Planned Outage request if System Management considered that the relevant capacity would not otherwise be available for dispatch, as proposed in RC_2013_15.</p>	
18	<p>Other issues</p> <p>No additional issues were raised.</p>	
19	<p>Next Steps</p>	

	Mr Winston Cheng advised that it was unlikely that any of the proposed amendments would require changes to WEMS, and agreed that AEMO would confirm this in the near future.	
--	--	--

The workshop ended at 3:20 PM.