

**Workshop for RC\_2013\_15:  
Outage Planning Phase 2 – Outage Process Refinements**

**17 September 2018**

# Workshop aims

- Review changes affecting proposal since its submission
- Seek stakeholder input on potential problems/refinements
- Opportunity for stakeholders to raise new questions/concerns
- Provide input to development of call for further submissions
- Next steps and action items

# Obligations to participate in outage planning process (1)

- Issue 1: Restrict Facilities that must be included on the Equipment List under clause 3.18.2(c)(ii) to Scheduled Generators and Non-Scheduled Generators holding Capacity Credits with a nameplate capacity  $\geq 10$  MW (i.e. remove obligations for Demand Side Programmes and Associated Loads, Dispatchable Loads and Interruptible Loads)
- Issue 2: Amend clause 3.18.2(c)(i) to require the Equipment List to include “any part of a transmission system or distribution system (however defined by System Management) that could limit the output of a generation system included on the Equipment List” (currently “all transmission network Registered Facilities”)

# Obligations to participate in outage planning process (2)

- Issue 3: Clarify obligations to request Planned Outages for Equipment List Facilities and report Planned Outages for Small Outage Facilities (clauses 3.18.2A(b) and 3.19.2A)
- Question: What requirement for <10 MW Scheduled Generators with Capacity Credits?
- Question: Materiality threshold for Non-Scheduled Generators?

# Planned Outages and Balancing Submissions (1)

- Issue 4: Clarify how ‘available’ and ‘unavailable’ capacity are included in Balancing Submissions
  - Changes to clause 7A.2.4 and Balancing Submission Glossary definition
  - New clauses 7A.2.4A, 7A.2.4B and 7A.2.4C
  - Similar changes in RC\_2014\_06 (Removal of Resource Plans and Dispatchable Loads)
- Question: Unavailable quantity requirement for Non-Scheduled Generators? Currently
  - RC\_2013\_15 requires this to be provided
  - RC\_2014\_06 does not

# Planned Outages and Balancing Submissions (2)

- Issue 5: Clarify deadlines for approval of Planned Outages
  - Amend clause 3.19.2 to set the deadline for requesting approval of an Opportunistic Maintenance request to 30 minutes before Balancing Gate Closure for the Trading Interval in which the outage is due to commence
  - **Question: Should the deadline for requests be some finite period before the deadline for approval/rejection? If so, how long should that period be (EMOP proposed 3 hours)?**
  - New clause 3.19.4A – if no decision on a request for approval of a Planned Outage by this time the request is deemed to be rejected

# Planned Outages and Balancing Submissions (3)

- Issue 6: Clarification of requirements for Balancing Facilities (excluding the Balancing Portfolio) – new clause 7A.2.8A to clarify that a Market Participant must, for each of its Balancing Facilities and for each Trading Interval in the Balancing Horizon, use its best endeavours to ensure that, at all times, any of the Facility’s capacity that is
  - subject to an approved Planned Outage or
  - subject to an outstanding request for approval of a Planned Outageis declared as unavailable in the Balancing Submission for the Facility and the Trading Interval, unless the Facility is undertaking a Commissioning Test in that Trading Interval
- Based on consideration of the recent Bluewaters Supreme Court decision, AEMO has determined that a Commissioning Test cannot be undertaken under a Planned Outage
- **Question: should Commissioning Tests under a Planned Outage be permitted?**

# Planned Outages and Balancing Submissions (4)

- Issue 6: Clarification of requirements for Balancing Facilities (excluding the Balancing Portfolio) – new clause 7A.2A.1 to clarify that a Market Participant must, as soon as practicable after Balancing Gate Closure for each Trading Interval, for each of its Outage Facilities, ensure that it has notified System Management of a Forced Outage or Consequential Outage for any capacity declared unavailable in the Facility's Balancing Submission that
  - was not subject to an approved Planned Outage or Consequential Outage at Balancing Gate Closure for the Trading Interval and
  - is not attributable to a difference between the expected temperature at the site during the Trading Interval and the temperature at which the Sent Out Capacity for the Facility was determined
- **Question: What requirement for Scheduled Generator capacity that is not subject to Capacity Credits that the Market Participant chooses not to offer into the Balancing Market (but is not undergoing maintenance)?**



# Planned Outages and Balancing Submissions (5)

- Issue 6: new clause 7A.2A.1 requirement will not apply to capacity subject to a previously approved Planned Outage that was then rejected by System Management less than 30 minutes before Balancing Gate Closure (clause 7A.2A.3)
- **Question: Do start-up times need to be taken into account here (similar to RC\_2014\_03 (Administrative Improvements to the Outage Process))?**
- New clauses to clarify a Market Participant's obligations in the event of a late rejection of a previously approved Planned Outage (clause 7A.2.9B) or the recall of a Planned Outage that is underway (clause 7A.2.9C)
  - Requirement to update Balancing Submissions as soon as practicable for any relevant Trading Intervals in the Balancing Horizon for which Balancing Gate Closure has not yet occurred
- **Question: In these situations should System Management have the option to allow a Market Generator to re-enter the Balancing Market as soon as possible, even if this is after the relevant gate closure time?**

# Planned Outages and Balancing Submissions (6)

- Issue 7: clarification of requirements for the Balancing Portfolio – similar to those for other Balancing Facilities (taking into account the different Balancing Submission deadlines) with the following exceptions
  - Capacity that is subject to an outstanding request for approval of a Planned Outage should be declared as available in the Balancing Submissions for the relevant Trading Intervals
  - If Synergy receives approval for a Planned Outage later than its usual gate closure time, it will be required to amend its Balancing Submission for the affected Trading Intervals to make the relevant capacity unavailable, but must remove the capacity from its highest price Balancing Price-Quantity Pairs, leaving its lower price Balancing Price-Quantity Pairs unchanged
  - Specific requirements in new clauses 7A.2.9(g), 7A.2.9A and 7A.2A.2

# Timelines for Planned Outages (1)

- Progression dependent on SMMITS changes
- Issue 8: Amend clause 3.19.1 to clarify that approval of a Scheduled Outage must be requested no later than 10:00 AM on the day before the Scheduling Day for the Trading Day in which the proposed outage is due to commence (TD-2)
- Issue 9: Amend clause 3.19.2 to allow Opportunistic Maintenance requests to be for any period up to 24 hours in length

# Timelines for Planned Outages (2)

- Issue 10: Amend clause 3.19.2 to allow a participant to submit an Opportunistic Maintenance request at any time between 10:00 AM on TD-2 and 30 minutes before Balancing Gate Closure for the Trading Interval in which the requested outage is due to commence
  - No change proposed to requirement under clause 3.19.4 for System Management to approve or reject a Planned Outage request and inform the participant as soon as practicable
  - **Question: Is the obligation in clause 3.19.4 sufficiently explicit?**
  - System Management retains the ability to reject an Opportunistic Maintenance request if it is unable to assess the impact in the time available

# Timelines for Planned Outages (3)

- Issue 11: Amend clause 3.19.3A(b) to require 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
- Issue 12: Amend clause 3.18.2A to
  - 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
  - Clarify that a Market Participant must notify System Management if the timing of an outage changes or the outage is no longer required

# Timelines for Planned Outages (4)

- Question: EMOP project proposed:
  - Outage Plan submission deadline of 9:00 AM on TD-2 (rather than 10:00 AM)
  - Outage Plan approval/rejection deadline of 2:00 PM on TD-2 (current proposal 30 minutes before Balancing Gate Closure)

Are these changes worth progressing as part of RC\_2013\_15?

# Issue 13: Availability declarations (1)

- New clause 3.19.2B, which prohibits a Market Participant from requesting approval of a Planned Outage for a Scheduled Generator or Non-Scheduled Generator if the Market Participant does not expect in good faith that, if System Management rejected the request, the capacity to which the request applies would be available for dispatch for the duration of the proposed outage
- Interactions with recent Bluewaters Supreme Court decision
- Question: Will this obligation as drafted produce efficient outcomes?
- Question: Should the obligation apply to acceptance or approval requests?

# Issue 13: Availability declarations (2)

- Add new clause 3.18.2A(h), which imposes a similar requirement on Market Participants around notifications of Planned Outages for Small Outage Facilities
- Add new clause 3.19.2C, which requires a Market Participant with a Planned Outage request that has not yet been approved or rejected by System Management to immediately notify System Management and withdraw the request if it ceases to expect that the capacity would be otherwise available (e.g. in the event of a Forced Outage of the Facility)
- **Question: Will this obligation produce efficient outcomes?**
- **Question: When should a change in circumstances require the withdrawal/rejection of a Planned Outage request?**



# Issue 13: Availability declarations (3)

- Two exceptions (new clause 3.19.2D)
  - Where the proposed Planned Outage will immediately follow a Scheduled Outage of the relevant capacity (i.e. the outage is effectively an extension of a Scheduled Outage) and
  - Where the Market Participant reasonably expects that the capacity would be subject to a Consequential Outage if the proposed Planned Outage did not proceed
- Replace clause 3.19.3A(c) with new clause 3.19.3B, which allows System Management to decline to approve a Planned Outage for an Equipment List Facility where it considers that the capacity to which the request applies would not otherwise be available for dispatch for the duration of the proposed outage

# Other issues

- Have we missed any changes since the submission of RC\_2013\_15 that affect the proposed amendments?
- Any new relevant questions or concerns?

# Next steps

- Confirm no WEMS changes needed
- Confirm options to modify SMMITS before implementation of System Management System Transfer project
- Call for further submissions
- Follow up meetings to clarify some first period submissions