



EnergyAustralia

LIGHT THE WAY

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RSIG consultation
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Dear Ms Lizamore

AEMO – Reliability Standard Implementation Draft Guideline - 2017

EnergyAustralia is one of Australia's largest energy companies with over 2.5 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own and operate a multi-billion dollar energy generation portfolio across Australia, including coal, gas, and wind assets with control of over 4,500MW of generation in the National Electricity Market.

We welcome the opportunity to provide further comments on the proposed amendments to the Reliability Standard Implementation Guideline (Guideline), following the release of the Draft Guideline and the second AEMO led workshop on this issue held on 14 June 2017. As stated previously, we support the proposed improvements to the medium term projected assessment of system adequacy (MTPASA) as outlined by AEMO.

Following the second workshop we do consider further improvements could be made to the MTPASA modelling inputs, particularly after discussion regarding the accuracy of information contained within the network outage schedule (NOS). It was made clear that in many cases the NOS data was not accurate much further than one month out from proposed outages. As discussed at that workshop, the inputs into the MTPASA are fundamental to the accuracy of projections. Given the length of time that network service providers are likely to schedule major outages, more emphasis on ensuring the NOS is updated at the earliest opportunity is required. While we understand that some level of flexibility may be required in scheduling outages, a more rigorous process may be necessary to ensure that outages are included in the NOS, and thus available as an input into the MTPASA, as early as possible within the 2-year window the NOS covers.

Some clarification regarding the proposed methodology for including new generation builds would be useful. We consider that limiting the inclusion of new builds to 'committed' plant results in too short a period for which they are included in the MTPASA. As with the issue of network outages, new generation builds should be added as an input into the MTPASA as close to the beginning of the 2-year window as possible. We appreciate that each project may have widely varied timeframes and stages for completion, however AEMO should be able to provide a set of principles they could use to determine which projects should be included in the MTPASA at the earliest opportunity. Further, it is important to model the impact of these new builds on transmission, especially interconnector flows and limits.

Included in AEMO's presentation at the second workshop was a requirement for 'New Generation Information'. This included various information obligations around operational characteristics of generating units, site-specific operations at ambient temperatures, energy constraints and active power control settings. There was also a mention provision of auxiliary load information. We believe that AEMO already has access to most of this information via generator performance standards and MTPASA capacity & energy submissions. Further, auxiliary load information for generators can be derived by AEMO with information available in the Market Management System. Therefore, we do not consider this information is required to be part of the Guideline in its final format.

We support the position taken by AEMO relating to the publication of more granular categorisation of bids, down to dispatchable unit identification (DUID) level. While we agree that there may be some level of information asymmetry, we do not consider that this is enough to justify publication of this level of detail by reference to the National Electricity Objective.

If you would like to discuss this submission please contact Chris Streets on 03 8628 1393

Regards

Chris Streets
Industry Regulation Lead