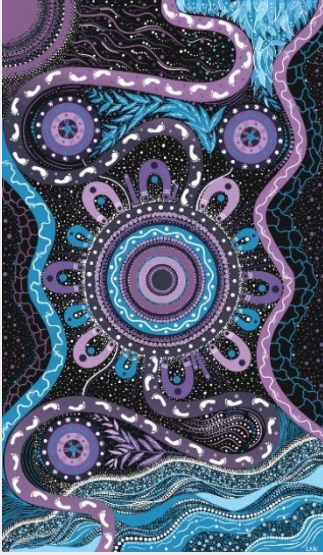


2025 GPSRR Approach Consultation Report

December 2024





We acknowledge the Traditional Custodians of the land, seas and waters across Australia. We honour the wisdom of Aboriginal and Torres Strait Islander Elders past and present and embrace future generations.

We acknowledge that, wherever we work, we do so on Aboriginal and Torres Strait Islander lands. We pay respect to the world's oldest continuing culture and First Nations peoples' deep and continuing connection to Country; and hope that our work can benefit both people and Country.

'Journey of unity: AEMO's Reconciliation Path' by Lani Balzan

AEMO Group is proud to have launched its first [Reconciliation Action Plan](#) in May 2024. 'Journey of unity: AEMO's Reconciliation Path' was created by Wiradjuri artist Lani Balzan to visually narrate our ongoing journey towards reconciliation - a collaborative endeavour that honours First Nations cultures, fosters mutual understanding, and paves the way for a brighter, more inclusive future.

Important notice

Purpose

AEMO has prepared this document to report on the consultation completed on its approach paper for the 2025 General Power System Risk Review under clause 5.20A.2(c)(3) of the National Electricity Rules.

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Abbreviations

Abbreviation	Term	Abbreviation	Term
AER	Australian Energy Regulator	NE	New England
AEMO	Australian Energy Market Operator	NEM	National Electricity Market
AMP	AEMO Modelling Platform	NER	National Electricity Rules
AVP	AEMO Victorian Planning	NSP	Network Service Provider
BESS	battery energy storage system	OPDMS	Operations and Planning Data Management System
CER	consumer energy resources	PEC	Project Energy Connect
CMLD	composite load model	PSS®E	Power System Simulation for Engineering
DER	distributed energy resources	RAS	remedial action scheme
DNSP	distribution network service provider	REZ	renewable energy zone
DPV	distributed photovoltaic	SPS	special protection scheme
FY	financial year	TNSP	transmission network service provider
GPSRR	General Power System Risk Review	UFLS	under frequency load shedding
HCC	Hunter Central Coast	VCR	value of customer reliability
IBR	inverter-based resources	VNI	Victoria – New South Wales Interconnector
ISP	<i>Integrated System Plan</i>	ZIP	impedance (Z), current (I), power (P)
MSL	minimum system load		

1 Introduction

At the commencement of its annual General Power System Risk Review (GPSRR), AEMO publishes an approach paper under National Electricity Rules (NER) 5.20A.2(c)(3), on which it invites submissions from stakeholders.

AEMO published its approach paper for the 2025 GPSRR on 4 October 2024 and invited submissions from all interested persons. The closing date for submissions was 5 November 2024.

In response to the consultation, AEMO received submissions from AEMO Victorian Planning, ElectraNet, Energy Queensland and Transgrid, as well as submissions from two individuals. Relevant feedback and questions from those submissions have been published on AEMO's website¹. AEMO also invited stakeholders to an industry briefing on the 2025 GPSRR approach paper on 24 October 2024.

AEMO appreciates engagement and contributions from all the participating stakeholders for finalising the 2025 GPSRR approach paper.

AEMO published a final updated version of the approach paper in December 2024². The final approach paper incorporates changes based on AEMO's consideration of feedback received, as well as further review by AEMO on the scope of the work required to complete the GPSRR analysis.

The following sections include summaries of the stakeholder feedback received on the initial approach paper and AEMO's responses (where relevant), together with a description of the changes made to the 2025 GPSRR approach paper in response to submissions or further AEMO review.

¹ At <https://aemo.com.au/consultations/current-and-closed-consultations/2025-general-power-system-risk-review-approach-consultation>.

² See <https://aemo.com.au/energy-systems/electricity/national-electricity-market-nem/system-operations/general-power-system-risk-review>.

2 Consultation feedback and responses

This section sets out AEMO's responses to feedback raised in the submissions received on the approach paper and relevant points raised at the industry briefing.

2.1 Is it appropriate to apply the 2024 Integrated System Plan (ISP) Step Change scenario to assess future power system risks for the 2025 GPSRR?

Energy Queensland comments

Energy Queensland stated that it had no concerns regarding the decision to apply the 2024 *Integrated System Plan (ISP) Step Change* scenario to assess future power system risks.

Transgrid comments

In the 2024 ISP, AEMO has assigned a likelihood of 43% to the Step Change scenario, and the Progressive Change scenario a very similar likelihood of 42%. It would appear appropriate to apply both of these scenarios to assess future power system risks for the 2025 GPSRR. If the expansion of scope is prohibitive, the sensitivity of scenario choice should be considered for significant findings of the report.

Transgrid is concerned that the 2024 ISP Step Change scenario does not account for the delay in New England (NE) Renewable Energy Zone (REZ) timing and the type, and capacity of generation published by EnergyCo³. Transgrid thinks it is prudent to consider a sensitivity of a scenario with a delayed NE REZ for significant findings.

Transgrid would also recommend an update to other actionable network options such as the Hunter-Central Coast (HCC) REZ network plans as per the EnergyCo announcement.

AEMO response

AEMO acknowledges Transgrid's comments on the similar likelihoods assigned to the *ISP Step Change* and *Progressive Change* scenarios in the 2024 ISP. This was considered when choosing the methodology proposed in the approach paper. As per the ISP, the descriptions for the two scenarios are:

- *Step Change* reflects a pace of energy transition that supports Australia's contribution to limit global temperature rise to less than 2°C, with consumer energy resources (CER) contributing strongly to the transition.
- *Progressive Change* also reflects Australia's current policies and commitments to decarbonisation, but more challenging economic conditions and supply chain constraints mean slower investment in utility-scale assets and CER.

³ See <https://www.energyco.nsw.gov.au/ne-rez>.

The 2024 ISP notes that the near-term transition is very similar between the *Step Change* and *Progressive Change* scenarios. As the GPSRR is only considering risks up to five years in the future, it was determined that *Step Change* would be appropriate as it had a slightly higher likelihood and would also closely reflect the *Progressive Change* for the time considered.

AEMO has noted the delay in the New England REZ timing, however this delay will not have a significant impact on the GPSRR modelling as this is outside the five-year time horizon considered by the GPSRR.

The Hunter Central Coast REZ network plans are within the timing of the GPSRR studies, and the timing listed in Table 1 in the approach paper has now been updated to align with the announcements made by EnergyCo.

2.2 Are there any suggested improvements regarding the risk assessments, considering the approach is based on the 2024 GPSRR?

ElectraNet comments

AEMO should focus on a system view rather than a regional one, e.g. Battery Energy Storage System (BESS) response to remote events is a current issue in the South Australia network; however, it will potentially become a problem in other National Electricity Market (NEM) regions in the future.

Energy Queensland comments

The approach paper talks about risks arising from minimum system load conditions for South Australia and Victoria, and for the Victoria New South Wales Interconnector (VNI) flow from Victoria to New South Wales, however only notes that this risk will be experienced in New South Wales and Queensland in the 'near future'.

Based on the engagement that we are having with AEMO and Powerlink on minimum system load in Queensland, we understand that this is far more pressing for Queensland than this statement suggests.

As each state has different minimum system load conditions, different mitigation maturity and different network performance, it may be more appropriate to split this into jurisdictionally focused risk assessments.

Transgrid comments

Transgrid suggested the following improvements regarding risk assessment to be considered in the GPSRR:

- *Consideration of the risk exposure to the NEM due to the allowed operation in a non-secure, yet satisfactory state, for short periods, not exceeding 30 minutes.*
- *An analysis of historical occurrences and consequences of credible contingencies occurring whilst insecure.*
- *Consideration of a Monte-Carlo simulation approach to show the general level of risk on the NEM.*

AEMO response

AEMO acknowledges that the impacts of other regions should be considered when assessing system risks. For the assessment of inverter-based resources (IBR) response to remote frequency events, the 2025 GPSRR is planning to consider other regions in addition to the South Australian network. It has been identified that South

Australia may have a higher initial likelihood of this particular risk occurring, and therefore this is considered as the primary focus for these studies. However, other regions will also be investigated and if issues are identified, the 2025 GPSRR will provide commentary on this.

AEMO notes Energy Queensland's comments regarding minimum system load in Queensland, that it is a present risk and should not be understated. Discussions regarding minimum system load in the GPSRR intend to focus on the actions currently being considered in South Australia and Victoria, but how other regions can learn from this work and implement solutions NEM-wide will also be considered. To address Energy Queensland's comments, the final approach paper has been updated to better reflect the status of this risk in other regions.

AEMO appreciates the suggestions made by Transgrid on the risk assessment approach for the GPSRR. This approach will not be implemented for the 2025 GPSRR, but the merits of the proposed approach have been considered.

2.3 What are stakeholder views on how to effectively consider risks where the impact is difficult to define as part of the 2025 GPSRR?

Transgrid comments

Transgrid noted that it had a positive experience engaging with AEMO on risk mitigation measures regarding the HumeLink non-credible contingency. Transgrid also indicated it would continue to follow this process of engagement with AEMO and other stakeholders on risks.

2.4 What are stakeholder views regarding the priority risks proposed to be considered as part of the 2025 GPSRR, including any proposed changes to the events or the methodology for assessment?

AEMO Victorian Planning (AVP) comments

AEMO Victorian Planning (AVP) had the following comments regarding the risk overview tables in the approach paper:

Priority Risk 2

Minimum System Load (MSL) – system security issues associated with minimum demand conditions are a well-known issue. AVP believes there are existing management strategies and the description “existing management strategies” should include strategies such as the high voltage management strategy and the system strength constraints developed by AEMO and AVP already in place.

Priority Risk 3

Unexpected operation and interaction of control and protection systems are a well-known issue. AVP believes there are existing management strategies and the description “existing management strategies” should include strategies such as the Remedial Action Scheme (RAS) management strategy already in place.

Priority Risk 4

Increasing impacts of non-credible contingencies – AVP would like to clarify if this risk will be evaluated using power system analysis tools such as Power System Simulation for Engineering (PSS®E).

ElectraNet comments

Priority Risk 1

ElectraNet suggests that AEMO should also consider the thermal overloading of transmission elements, which can result in cascading tripping due to BESS responses. This is an emerging risk, especially during critical transmission elements outage conditions.

Priority Risk 2

ElectraNet recommends that AEMO undertakes sensitivity studies looking at post-Project Energy Connect (PEC) Stage 2 as an additional scenario for this risk.

Transgrid comments

Transgrid considers the priority risks a reasonable list. The increasing impacts of non-credible contingencies is of particular interest. Anecdotally, the NEM appears to be running in a less resilient state, leading to the aforementioned increasing impacts of non-credible contingencies. Operation of the NEM seems closer to the edge of security for increasingly larger periods of time. The NEM is secure by definition most of the time, but statistical consideration of how often the NEM is more secure, and by how much, would provide insights.

It would be useful to examine the practices of application of NER S5.1.8 to identify and require control systems to avoid and limit consequence of non-credible contingencies by AEMO and NSPs. Regarding the increased size of non-credible contingencies due to abnormal weather conditions and the rising levels of CER, is it possible to consider increasing the contingency size of the frequency control market instead of relying on a Special Protection Scheme (SPS)? With the growing number of BESS in the NEM, it might be more effective to coordinate the response of power plants within the same regional reference node.

AEMO response

AEMO notes AVP's suggestions for existing management strategies for Priority Risks 2 and 3. The draft approach paper stated that these are emerging risks with new management strategies under development. AEMO acknowledges that there are some existing management strategies that address some issues, while there may be a need for new management strategies to be implemented to manage these risks. Table 7 and Table 8 in the final approach paper have been updated to reflect this.

In regard to AVP's query on Priority Risk 4, it is not currently planned to study this risk in PSS®E. Increasing risks of non-credible contingencies will not be limited to specific contingencies or scenarios, but will be a general discussion and engagement with industry. This analysis is planned to investigate the factors that are contributing to higher likelihoods and consequences associated with non-credible contingencies and if particular scenarios or contingencies are identified as being high risk, this may be recommended for further study by NSPs or in a future GPSRR.

AEMO notes ElectraNet's suggestion to consider the thermal overloading of transmission elements in its assessment of Priority Risk 1. The potential overloading of transmission lines was mentioned as a potential impact in the Risk 1 overview table (Table 6 in the final approach paper). Current studies are only intended to cover system normal conditions, but based on the outcomes, recommendations or discussion surrounding the impacts of outages can also be considered.

AEMO acknowledges ElectraNet's recommendation to undertake future studies with PEC stage 2 for the analysis for Priority Risk 2. The current focus for minimum system load conditions is on managing the current risks that are present in the system, and due to this it is current system studies that are prioritised. The impact of PEC stage 2 on MSL is important to understand and may be considered in a future GPSRR.

AEMO thanks Transgrid for its support of the priority risks proposed, and its particular interest in Priority Risk 4. As mentioned by Transgrid, there are many factors to consider for this risk such as compliance with NER S5.1.8, the suitability of control schemes to manage non-credible contingencies, weather-related factors, the impacts of increasing CER, and the potential for frequency response to assist. The analysis of this risk in the GPSRR intends to cover these topics and discuss potential recommendations or considerations that will be required in relation to them.

2.5 What are stakeholder views regarding the proposed modelling approach for the priority risks for assessment in the 2025 GPSRR?

Transgrid comments

AEMO has replaced the Operations and Planning Data Management System (OPDMS) with the Asset Management Platform (AMP) and it would seem reasonable to update the GPSRR documents to reflect this.

Under Frequency Load Shedding (UFLS) Models

The large-scale installation of rooftop photovoltaic (PV) generation has led to a dilemma for UFLS, whereby traditional loads for UFLS are often a generation source rather than a load for a considerable period of time. One of the solutions to this outcome is to develop load shedding relays that may operate or not based on direction of power flow. UFLS models used in the GPSRR should accurately reflect the operation of such schemes. Over-simplification is likely to lead to inaccurate outcomes. In particular, the dynamic response of the direction detection should be accurately modelled.

Composite Load (CMLD) Model

The composite load model is reasonably new, has had limited benchmarking and is applied extensively across the NEM loads. The use of traditional load models as a sensitivity for studies with significant outcomes would be a useful exercise.

AEMO response

AEMO notes Transgrid's suggestion regarding the use of terminology between the Operations and Planning Data Management System (OPDMS) and the AEMO Modelling Platform (AMP). These can be considered as synonyms for the purposes of the GPSRR and refer to the software platform used to access the NEM PSS®E cases based on

historical 30-minute dispatches. AEMO is currently transitioning to AMP from OPDMS⁴. In the draft approach paper OPDMS was referred to, but the final approach paper has now been updated to reference both terminologies and explain the transition from OPDMS to AMP.

Regarding the use of UFLS models, AEMO is currently progressing the redevelopment of the UFLS models to incorporate both the tripping of CER and load to improve the accuracy of UFLS modelling. When determining whether to model the use of dynamic arming for UFLS feeders, it must be noted that dynamic arming is still being progressively rolled out across the NEM and cannot be assumed to be present for all regions. This is commented on in the 2024 GPSRR in Table 28, *Summary of mainland NEM regions UFLS remediation projects*. The use of dynamic arming will only improve the performance of UFLS, so in the absence of confirmation of dynamic arming in each region, the conservative approach is to not include them until they are implemented.

AEMO notes Transgrid's comments on the use of the CMLD models. The CMLD model is relatively new compared to previous ZIP load models, but from the development and benchmarking that has been conducted, the CMLD model more accurately reflects the performance of the power system. The CMLD model has had benchmarking and validation conducted, as detailed in the report *PSS@E models for load and distributed PV in the NEM*⁵ published in November 2022 and in the updated 2024 report *PSS@E composite load and distributed PV model updates*⁶. The benchmarking described in these reports indicates that the CMLD model more closely represents the response of high-speed measurement data taken from real power system incidents when compared to the existing impedance (Z), current (I) and power (P) (ZIP) load models. Furthermore, the ZIP load models were last modified and validated in 1999, and the end-use load composition has changed considerably since that time. These older models no longer accurately reflect the performance of the power system under all conditions, and choosing to use these brings its own assumptions and potential inaccuracies.

AEMO notes Transgrid's suggestion on completing sensitivities for studies with significant outcomes. This would be a prudent approach to understand the impact of the load modelling assumptions on the study outcomes. AEMO will consider completing these sensitivity studies where required.

2.6 What are stakeholder views regarding the proposed risk cost assessment methodology to be applied in the 2025 GPSRR?

AEMO Victorian Planning comments

The value of customer reliability (VCR) value \$43.23/kWh was shown in the approach paper and was sourced from AER 2019 Values of Consumer Reliability paper. This value is specific for South Australia only, and if this value is to be applied for other regions then reasoning for the assumption should be made.

In the 2025 GPSRR Approach Paper, Section 5 describes the risk cost assessment methodology, including the risk cost formula. AVP would like the GPSRR to clearly state that the probability of a risk event (P_c) is an individual event and is not an annualised probability or a group of individual events.

⁴ As detailed at <https://opdms.prod.nemnet.net.au/>.

⁵ See <https://aemo.com.au/-/media/files/initiatives/der/2022/psse-models-for-load-and-distributed-pv-in-the-nem.pdf?la=en>.

⁶ For CMLD model validation, see Appendices A3 to A7 at https://aemo.com.au/-/media/files/initiatives/der/2024/report---psse-composite-load-and-distributed-pv-model-updates_.pdf?la=en.

AEMO response

AEMO appreciates AVP's comments regarding the VCR value for South Australia that was used in the draft approach paper. This value is appropriate for calculating the risk cost for loss of load in South Australia, but is not appropriate to be applied for loss of load in other regions. AEMO has now updated the final approach paper to list the overall VCR value for the NEM, and to specify that depending on the region of lost load, individual region values can be used. As noted in section 5 of the approach paper, there is work underway by the Australian Energy Regulator (AER) to review and update the VCR by 18 December 2024. Once this update is complete, the new values for VCR as determined by the process will be used for the GPSRR.

AEMO notes AVP's suggestion regarding the risk cost formula. In relation to this specific formula, this does describe a single risk event, but it should be noted that this does not limit the GPSRR from considering groups of individual events as priority risks.

2.7 Does the proposed consultation approach meet stakeholder expectations and do stakeholders have any suggestions on how AEMO could best engage with industry on the 2025 GPSRR?

Energy Queensland and Transgrid comments

Energy Queensland and Transgrid both noted that the consultation approach for the 2025 GPSRR meets expectations.

2.8 Other submissions

A summary of other relevant submissions regarding the approach paper is included in this section.

Dr Anne Smith submission

Dr Anne Smith provided comments on the four priority risks proposed to be studied in the 2025 GPSRR. Dr Smith notes that there are a number of potential social, economic and environmental concerns posed by the priority risks that should also be considered in addition to the technical challenges outlined in the approach paper. Further context was also provided on the NER obligations associated with each of the priority risks and a number of international case studies that could be referenced.

For international case studies, Dr Smith referenced the following for each of the Priority Risks:

- Priority Risk 1 – California's August 2020 blackouts. Dr Smith notes that rapid IBR frequency response could be an issue in heatwave conditions when interconnector transfers are high, and generation reserves are low.
- Priority Risk 2 – Germany has already implemented additional tools and strategies to assist with management of minimum system load conditions that could be considered as part of the NEM's transition.
- Priority Risk 3 – The United Kingdom experienced a blackout in 2019 with a series of cascading protection operations.

- Priority Risk 4 – Texas experienced a blackout in 2021 related to severe weather from Winter Storm Uri, resulting in financial impacts in the billions of dollars.

AEMO response

AEMO thanks Dr Anne Smith for her submission. The highlighted additional impacts and international case studies have been considered as inputs for the 2025 GPSRR.

2.9 Industry briefing session

AEMO thanks attendees of the industry briefing session for their engagement and feedback on the 2025 GPSRR approach. Below is a summary of the questions related to the approach paper at the session, and AEMO’s responses.

Questions	AEMO responses
Is AEMO considering the future changes to interconnector power transfer ratings? For example, Project Energy Connect, Heywood Interconnector and Basslink are going to see changes in their ratings. Will these be considered in the GPSRR studies?	AEMO’s considerations will depend largely on the year being assessed, planned network augmentations, and when rating changes will be committed into the power system. The GPSRR has a five-year outlook, with the current GPSRR looking up to financial year (FY) 2027-28. Due to this, PEC and Heywood interconnector rating upgrades will be appropriately considered in the studies. It is currently not expected that Basslink’s transfer rating will have an impact on the study outputs, however, this will be monitored in the studies and included as necessary.
For minimum system load conditions, how does AEMO propose to consider interconnector availability and the connection point conditions of these interconnectors in neighbouring jurisdictions?	AEMO noted that individual regions cannot necessarily rely on interconnectors to assist during MSL, as neighbouring regions may be experiencing the same (or similar) issues/conditions.
Will the consideration of minimum system load be managed from a holistic lens rather than individual jurisdictions managing minimum system load independently?	AEMO indicated the value in undertaking a broader approach regarding the management of MSL and associated impacts in the GPSRR, instead of considering this risk region-by-region, as MSL conditions may be coincident in multiple jurisdictions.
Will the assessment of unexpected operation of control schemes and protection systems result in an update to the Remedial Action Scheme guidelines?	There are currently plans to revise the RAS guidelines and the work completed on the operation and interaction of control and protection systems in the 2025 GPSRR will likely feed into this. It is expected that engagement with various system operators and network service providers will identify areas of improvement that can be used in the revision of the RAS guidelines.
Does AEMO intend to look at the increasing risks of non-credible contingencies (Priority Risk 4) from a holistic approach regarding the flow-on impacts of non-credible contingencies? Or will this involve the investigation of specific contingencies and localised impacts to individual regions?	Priority Risk 4 will have a more holistic approach because this is a wider NEM issue that requires consideration of the high-level impacts and factors that contribute to it. Having done the high-level review first, this may lead to a focus on detailed studies and associated modelling effort in a future GPSRR.
What outputs, actions or recommendations does AEMO expect to result from analysing the increasing risks of non-credible contingencies?	Outcomes from this analysis will be dependent on the discussions with industry participants, but consultation on this risk may identify aging infrastructure supporting critical transmission lines, or forecasts for increased severe winds in a region. This may highlight particular regions for in-depth studies for a future GPSRR, or for TNSPs to conduct their own studies to understand the immediate risk that may be presented. Outside of future line studies, operational measures such as vulnerable line classifications or other measures such as reform initiatives related to contingency sizes could be considered.

3 Summary of changes

Considering the consultation feedback that AEMO has received in both written submissions and the industry Q&A session, AEMO has made a number of updates to the approach paper. These changes have been made as new information has become available, through review of the scope of work required to complete the GPSRR, and for clarification purposes.

In summary, these changes are:

- Throughout the document, updates to change the document from a consultation phase to a final stage and to provide updates on the latest status and timeline.
- In response to Transgrid's comment on the timings of major transmission projects (see Section **Error! Reference source not found.**2), the timing for Hunter-Central Coast REZ Network Infrastructure project has been updated.
- As per Energy Queensland's comment on minimum system load conditions, Section 3.5 has been updated to indicate this is a current issue in Queensland and New South Wales rather than a future issue.
- The risk overview tables in Section 3.5 for Priority Risk 2 and Priority Risk 3 have been updated as per suggestion from AVP.
- Section 4.4 has been updated to provide further context on the transition from the OPDMS to the AMP.
- The value for VCR outlined in Section 5 has been updated as per suggestions from AVP.