

**Submission received via email to the GPSRR@AEMO.com.au mailbox**

Please find responses to the 2025 GPSRR Approach Paper consultation questions below.

Number	Consultation Question	Answer
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?	No comment
2	Are there any suggested improvements regarding the risk assessments, considering the approach is based on the 2024 GPSRR?	No comment
3	What are stakeholder views on how to effectively consider risks where the impact is difficult to define as part of the 2025 GPSRR?	No comment
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?	<p><b>Priority Risk 2</b> Minimum System Load Days – 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.</p> <p><b>Priority Risk 3</b> 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 management strategy already in place.</p> <p><b>Priority Risk 4</b> Increasing impacts of non-credible contingencies– AVP would like to clarify if this risk will be evaluated using power system analysis tools such as PSS/E.</p>

5	What are stakeholder views regarding the proposed modelling approach for the priority risks for assessment in the 2025 GPSRR?	No comment
6	What are stakeholder views regarding the proposed risk cost assessment methodology to be applied in the 2025 GPSRR?	<p>The 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.</p> <p>Section 5 Risk cost assessment methodology describes the risk cost formula. AVP would like the GPSRR to clearly state that the probability of a risk event (<math>P_c</math>) is an individual event and is not an annualised probability or a group of individual events.</p>
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?	No comment

Kind regards,

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