

# WHOLESALE ELECTRICITY MARKET

## Submission to Procedure Change Proposal

**AEPC\_2017\_08**

**Power system operating procedure: network modelling data**

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### Submission

Clause 2.10.7 of the Wholesale Electricity Market Rules (**WEM rules**) provides any person may make a submission for a Procedure Change Proposal (including proposals developed by AEMO, the Economic Regulation Authority or the Rule Change Panel) by completing this Procedure Change Submission form.

Submissions should be provided by email to the nominated contact in the call for submissions published with the Procedure Change Proposal.

## **1. Please provide your views on the Procedure Change Proposal, including any objections or suggested revisions**

Synergy considers “security constraints” requires definition in table 1. For example it is unclear whether security constraints include network capacity constraints.

Synergy notes the procedure requires Western Power (**WP**) to provide AEMO with a significant amount of technical information and data. Further, the procedure provides material rights to AEMO to request additional information or require WP to provide information which may currently not exist. Given WP’s information and data provision compliance costs are expected to be passed to network users (Synergy pays approximately 80% of WP’s network charges) and noting the WEM rule objective to “minimise the long-term cost of electricity supplied to customers from the South West Interconnected System”, Synergy considers step 2.2 should contain an overall reasonableness test in relation to AEMO’s very broad information gathering powers.

Synergy does not consider the procedure adequately specifies the process to be followed by AEMO when accessing information and data the subject of the procedure. The procedure simply states in various steps AEMO will ensure access to WP’s information, models and data is restricted to AEMO staff that require information and data to meet AEMO’s obligations under the WEM rules. The procedure should explicitly state AEMO’s obligations to keep this data secure, private and not disclose to third parties unless otherwise provided for under the WEM rules and procedures.

Synergy notes various references within the procedure such as “up to date”, “at all times” and “as soon as practical” are broad and subjective. For example, under step 2.2.1(a)(ii) how is “up to date” measured, how often should it be updated and reviewed, how will AEMO validate information is correct? Procedural clarity on these matters would assist market participants to better understand and comply with the requirements.

Steps 2.2.1(b)(iii)(A), 2.2.1(c)(iii)(A), 2.2.1(e)(iii)(A) how will “accurate” be determined and measured?

Step 2.2.1(c)(iii)(C) Reference to “other models” requires greater clarity. For example, is the reference limited to WPs models or does it also include AEMO models?

Step 2.2.1(c)(iii)(D), 2.2.1(d)(iii)(A)(10) and 2.2.1(e)(iii)(B). This requires greater specification in terms of the circumstances AEMO can advise WP of a change requirement in relation to: (a) the model within the EMS (including telemetry, telemetry data, calculations or calculations results to support constraint modelling); or (b) limit data (including missing limit data) requirements; and (c) short circuit capability calculations and calculation results, telemetry and telemetry data.

Step 2.2.1(d)(i)(B). Synergy recommends AEMO reviews this provision against the ERA approved technical rules for consistency.

Synergy questions whether step 2.2.1(f) contains sufficient detail of the technical and communications criteria required by clause 2.28.3A(c) of the WEM rules.

Given the significant information AEMO will receive in relation to network modelling data Synergy seeks AEMO’s position on what information it will consider releasing to market participants, in what form and when, such as security constraint data.

## **2. Please provide an assessment whether the Procedure Change Proposal is consistent with the Market Objectives and the Wholesale Electricity Market Rules.**

Synergy notes clause 2.28.3A of the WEM rules specifies System Management must develop a power system operation procedure in relation to various network modelling data including “information that a Network Operator must provide to System Management”. However, the procedure as drafted refers to “AEMO” throughout. Although it is

recognised System Management sits within AEMO, Synergy considers all references within the procedure to “AEMO” should be amended to “System Management” consistent with clause 2.28.3A of the WEM rules.

- 3. Please indicate if the Procedure Change Proposal will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.**

Refer second paragraph item 1 above.

- 4. Please indicate the time required for your organisation to implement the changes, should they be accepted as proposed.**

NA