

# WHOLESALE ELECTRICITY MARKET

## Submission to Procedure Change Proposal

**AEPC\_2018\_03**

**Power System Operation Procedure: Communication and Control Systems**

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<b>Date submitted:</b>	22 May 2018

### Submission

Clause 2.10.7 of the Wholesale Electricity Market Rules provides that 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.

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

Section 2.9 – Specific Requirements – Network Operator

Western Power acknowledges that it must provide AEMO with access to its operational voice communications system and comply with the requirements under section 2.9.2 of the PSOP and the Technical Rules. However, Western Power is of the view that it should be able to determine its telephone system, as long as the system continues to meet the requirements under the PSOP and Technical Rules.

Contrary to clause 2.9.3 of the PSOP, Western Power notes that the IMS Interface Market Procedure has not specified the obligations regarding confidentiality and retention of historical records.

Section 5.3 – Data Communications Standard

Under section 5.3 of the PSOP, the Power System Data Communication Standard (Standard) sets out the data communication standards that Western Power must comply with when transmitting data to and from AEMO. Western Power is of the view that the current version of the Standard is only applicable to the National Electricity Market and may not be applicable to Western Power. To prevent any confusion or inconsistencies, Western Power suggests that the PSOP refers to a data communications standard that is made under the WEM Rules and applicable to the Wholesale Electricity Market.

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

In relation to the current Standard, Western Power makes the following observations:

- The Standard is made under the National Electricity Rules (NER) and has effect only for the purposes set out in the NER.
- The Standard does not make any references to the Wholesale Electricity Market or the WEM Rules.
- The NER and the National Electricity Law will prevail over the Standard should there be any inconsistencies.
- Western Power is not a Network Service Provider under the NER.
- The terms used in the Standard refers to terms defined under the NER.

**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.**

In regards to section 2.9 of the PSOP, Western Power will incur costs to maintain its telephone system. Western Power may need to incur further costs should it be required to make any changes to its current telephone system. Western Power notes that the funding required for the maintenance costs is dependent on the ERA's final determination on Western Power's proposed access arrangement for the period 2017-2022.

In regards to section 5.3 of the PSOP, Western Power will need to invest in its communications network in order to comply with the Standard. In particular Western Power will need to make significant investments to its older sites, which are currently not in compliance with the Standard. Western Power notes that it has not specifically included these costs in its fourth access arrangement proposal.

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

Western Power has not assessed the additional costs, resourcing and time required to align its communications network with the Standard. Western Power will carry out this assessment once it receives confirmation from AEMO on the application of this Standard.