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Your Ref: REL0085
Contact Officer: George Huang
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9 August 2022

Charles Popple
Chair
Reliability Panel
Level 15 60 Castlereagh Street
SYDNEY NSW 200

Dear Mr Popple

Re: 2022 Review of the Guidelines for identifying Reviewable Operating Incidents

The Australian Energy Regulator (AER) welcomes the opportunity to comment on the Reliability Panel's (the Panel's) draft report for the 2022 review of the guidelines for identifying reviewable operating incidents (draft report).

The purpose of the AER's submission is to provide feedback to the Panel on AEMO's proposal number 5 to limit the requirement to review incidents of non-secure or non-satisfactory operation of the power system to only where critical transmission elements are impacted or affected.

We note that the draft report is seeking feedback on whether non-credible sudden or unexpected changes in power flow should be included in the guidelines as a new reviewable operating incident that requires AEMO reporting.

In forming our response, we have been mindful of the current challenges which the power system is facing as the energy system transitions. In this context, we consider it is important there is transparency in how the power system is managed. Taking this into account, the AER:

- supports the Panel's view not to make the change set out in AEMO proposal 5. We agree with the Panel that AEMO's concerns that the current trigger could be interpreted too broadly and capture distribution system events have not been borne out in practice. We consider AEMO's power system operating incident reports are a valuable resource for stakeholders to understand how events are managed.

- on balance we consider a new trigger requiring AEMO to report on non-credible sudden or unexpected changes in power flow should be included in the guidelines as a new reviewable operating incident would be useful even if these types of events would likely be covered by existing triggers. Having a separate trigger would ensure it is clear when such a type of event has occurred. However, we understand a trigger at this point may not be feasible as a definition for a non-credible sudden or unexpected change in power flow has not been developed. We understand AEMO is working towards a definition and would encourage the Panel to reconsider this question when an appropriate definition has been developed.

If you have any questions in relation to this submission please contact George Huang, Director Policy Development at george.huang@aer.gov.au or on 02 9230 3856.

Yours sincerely

A handwritten signature in black ink, appearing to be 'MF', written over a light grey circular stamp.

Mark Feather
General Manager - Strategic Policy General Manager - Strategic Policy and Energy Systems
Innovation
Australian Energy Regulator

Sent by email on: 09.08.2022