

19 March 2012

Mr Neville Henderson, Chair
AEMC Reliability Panel
PO Box A2449
Sydney South NSW 1235

Lodged online: www.aemc.gov.au

Dear Mr Henderson

REL0045 – SYSTEM RESTART STANDARD – DRAFT DETERMINATION

Macquarie Generation appreciates the opportunity to respond to the Reliability Panel's Draft Determination of the System Restart Standard. Specifically, Macquarie Generation would like to offer some comments with respect to the issue of restoration timeframes contained in section 3.1.

It is widely accepted that there is a high level of uncertainty with respect to restoration following a black system event. The Reliability Panel considers that it would be impractical for the Standard to specify definite times for system restoration, that the purpose of the Standard is not to set specific operational requirements, and that 'target timeframes' should be used as a guide for AEMO's SRAS procurement process. Macquarie Generation agrees with the Reliability Panel's view.

Of concern to Macquarie Generation is that the Draft Determination discusses the concepts of target timeframes and effective benchmarks, yet neither of these terms appear in the System Restart Standard. The Standard should be clearer on this to avoid the risk of conveying an unrealistic expectation of system restoration.

Examination of the black system experiences of other markets supports the argument that the benchmark of restoring 40% of peak load in a sub-network would be very challenging. Following the 2003 event in the Pennsylvania-New Jersey-Maryland system¹, restoration of the various sub-networks to the 40% benchmark ranged from 8 to 16 hours. Restoration following the 2003 event in Europe² achieved 40% in around 12 hours.

The System Restart Standard should clearly state that Restoration Timeframes are benchmarks to avoid the impression that they are specific operational requirements.

Yours faithfully



TIM ALLEN
GENERAL MANAGER MARKETING

¹ NYISO Interim Report - August 14, 2003 Blackout

² The Italian 2003 Blackout – A.Berizzi, Member IEEE