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Dear Dr Tamblyn

Attention: Anthony.englund@aemc.gov.au

TransGrid Submission to AEMC on System Restart Ancillary Service Arrangements and Pricing Under Market Suspension Consultation

TransGrid would like to thank you for the opportunity to comment on this consultation. This non-confidential submission outlines TransGrid's current position, primarily on issues concerning System Restart Ancillary Services arrangements, with a focus on the contents of the 'Updated Draft Rule' document.

TransGrid would like to highlight the following matters for possible improvement within the final Rule change package:

- Clause 3.11.4C Transitional provision for acquisition of non-market ancillary services

This clause does not provide a clear timeline or process to ensure that the new requirements are actually implemented by the Reliability Panel and NEMMCO. It is not readily apparent that this matter is addressed elsewhere in the Rule change. Given the importance of system restart to the community (which cannot be understated), and that the Rule change has been seen as a necessary improvement, the transition provisions need to be more specific on the process for ensuring that the new arrangements are implemented in a timely fashion by the Reliability Panel and NEMMCO within their other work priorities.

- Clause 4.8.12 (b) specifies that the system restart plan is *confidential information*.

This is somewhat impractical because the information must be made available to (and discussed with) all relevant participants (Generators, TNSPs, DNSPs) in order to develop a coordinated and successful response to a system blackout. The system restart plan is the principal subject of system restart seminars and meetings held regularly in NSW to ensure a good understanding of the plan by all parties.

- Clause 4.8.12 (d) has replaced "*Market Network Service Provider*" with "*Network Service Provider*".

This change appears to be a misunderstanding of the original requirements which applied only to providers of power. If this was an intentional change to include NSPs who were previously excluded, this makes a significant difference to subsequent requirements on NSPs in clauses (e), (f) and (g). As NSPs include TNSPs and DNSPs, the requirement for "*local black system procedures*" does not logically apply to these organisations which operate regional or wide area networks.

- In Chapter 10 new definitions section (page 19), the proposed definition of *major supply disruption* is given as, "the unplanned absence of *voltage* on a part of the *transmission system* affecting one or more *power stations*".

By this particular definition, the tripping of the single 330kV line 39 (Sydney West–Yass), which could interrupt a relatively small planned wind farm (namely 120 MW), would constitute a major supply disruption. This is inappropriate, as some measure of the amount of generation which is blacked out should be taken into consideration. It would be even more appropriate that the relevant criterion should not be based on the loss of generation, but the interruption of supply to a significant amount of load, which could be a specified percentage of regional load such as 10%. In NSW, this would amount to the interruption of at least 1,000MW.

TransGrid is also concerned that a number of paragraphs in the current documentation specify a requirement for consistency with the yet to be determined "system restart standard", but also already include some concepts from the SRAS review (primary, secondary restart sources, etc) in anticipation of the standard. TransGrid believes such wording may pre-judge the contents of the 'standard' and impose undesirable constraints on the formulation and development of the 'system restart standard'. In this regard care needs to be taken to properly balance the guidance given to the Reliability Panel within the Rules and the scope for the Reliability Panel to fully explore the range of options that are available for defining relevant 'output based' system restart standards.

I trust these comments are of assistance to you. Should you wish to discuss any of these matters further, please feel free to contact me on (02) 9284 3537 or via email: kym.tothill@transgrid.com.au

Yours sincerely


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