ERC0304 Enhancing operational resilience in relation to indistinct events

stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in this paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper. Stakeholders are also encouraged to provide evidence to support claims where possible.

SUBMITTER DETAILS

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| **ORGANISATION:** |       |
| **CONTACT NAME:** |       |
| **EMAIL:** |       |
| **PHONE:** |       |

**CHAPTER 3** — Assessment framework

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| **Question 1 — Assessment principles** |
| 1. Do stakeholders support using the proposed assessment framework?
 |       |
| 1. Are there any other principles that the Commission should consider when assessing the proposed rule?
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**CHAPTER 4** — Definition of indistinct events

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| **Question 2 — Defining indistinct events** |
| 1. Is it necessary to create a definition of indistinct events in the rules?
 |       |
| 1. Can stakeholders suggest any changes to the proposed definition to:
* better describe indistinct events?
* delineate between indistinct events and contingency events?
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**CHAPTER 5** — PROPOSED ARRANGEMENTS TO DETERMINE AND MANAGE INDISTINCT EVENTS

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| **Question 3 – Proposed framework for managing standing indistinct events** |
| 1. Is it appropriate to deal with standing indistinct events using the existing protected events framework, or do standing indistinct events need to be managed using a new, separate process?
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| 1. If a new process, what should this look like?
 |       |
| **Question 4 — Proposed protected operations framework for managing condition-dependent indistinct events** |
| 1. Do you support the proposed approach to protected operations?
 |       |
| 1. Is the proposed protected operations framework likely to be effective in managing indistinct risks at an appropriate cost?
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| 1. Should the Rules specify a process that AEMO must follow to determine whether an event should be managed using the ad-hoc approach? If so, what should that process be?
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| **Question 5 — General questions on the proposed framework for managing indistinct events** |
| 1. Can stakeholders identify any significant emerging risks to power system security that would not be captured under the proposed framework?
 |       |
| 1. Does the proposed framework provide AEMO with sufficient powers to manage protected events and protected operations once they are declared?
 |       |
| 1. Can stakeholders identify any duplication or overlap between the proposed framework and the existing credible contingency or protected events framework that may increase the complexity and/or cost of managing contingency events or indistinct events without delivering material security benefits?
 |       |
| **Question 6 — Consultation arrangements for protected operation and reclassification** |
| 1. Are the proposed consultation arrangements sufficient to provide stakeholders with confidence in AEMO’s use of protected operations and reclassification powers?
 |       |
| 1. Are the consultation obligations imposed on AEMO proportionate to the benefits?
 |       |
| **Question 7 — Options for implementation** |
| 1. To implement the proposed rule, should the AEMC follow a parallel process (Option A) or change the definition of contingency event (Option B)?
 |       |
| 1. Are the governance and accountability requirements under Option B appropriate?
 |       |

**CHAPTER 6** — GOVERNANCE, RESPONSIBILITIES AND Enforcement

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| **Question 8 — AEMO responsibilities** |
| 1. Do stakeholders support AEMO’s proposed responsibilities?
 |       |
| 1. Do parties consider that AEMO would have sufficient powers and accountability to efficiently and effectively manage indistinct events under the proposed rule?
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| **Question 9 — Reliability Panel responsibilites** |
| 1. Do you support the the Reliability Panel’s proposed responsibilities?
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| **Question 10 — Proposed expedited approval process** |
| 1. What is the most appropriate way for the Reliability Panel to determine whether an application to declare a proposed protected event as straightforward and non-controversial?
 |       |
| 1. Should criteria for defining whether a proposal is non-controversial be developed?
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| 1. Is the proposed approach likely to be an effective way of streamlining the protected events approval process?
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| **Question 11 — Role of NSPs and the GPSR in managing indistinct events** |
| 1. What responsibility should AEMO have for identifying potential condition-dependent indistinct events in the GPSR (if implemented), and what responsibility should each NSP have? For example, how should responsibility be apportioned for network configuration issues, such as protection settings, reclose arrangements and sophisticated tripping?
 |       |
| 1. If an NSP considers outcomes from the GPSR and takes action to improve system security as a result, can and should these actions count towards the NSP’s network capability component under the service target performance incentive scheme (STPIS)?
 |       |

**CHAPTER 7** — Costs and benefits

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| **Question 12 — Proposed approach to cost minimisation** |
| 1. Do you support the proposed cost-minimisation principle?
 |       |
| 1. Does the proposed framework contain adequate mechanisms to ensure standing, condition-dependent and ad-hoc indistinct events are effectively managed at least cost?
 |       |
| 1. Is the proposed approach to cost minimisation, including reliability panel oversight, the most effective framework for assessing proposed protected operation periods?
 |       |
| 1. Are there other more efficient and effective frameworks to minimise costs or assess protected operation periods?
 |       |
| 1. Is the proposed approach to cost minimisation sufficiently transparent to allow stakeholders to assess whether AEMO is efficiently managing indistinct events?
 |       |