# Attachment C: Summary of Minor and Consequential Rule Changes

| ID | Issue or Comments | Description of Proposed Rule | Clauses affected |
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| 1 | Clause 2A.2.5(b) describes alternative congestion management options, including under paragraph (b)(3) “other arrangements such as network support agreements or network control ancillary services agreements”. Network control ancillary services agreements  AEMO considers that clause 2A2.5(b)(3) should make use of the proposed defined term “network support and control ancillary services” to represent the “arrangements such as network support agreements or network control ancillary services agreements” to more broadly capture any agreement for the provision of NSCAS including, for example, those provided under a connection agreement. | Replace "under other arrangements such as *network support agreements* or *network control ancillary services* agreements…" with "under other arrangements for the provision of *network support and control ancillary services*" | 2A.2.5(b)(3) |
| 2 | Clause 3.1.4(a)(8) refers to the “national electricity market”. AEMO considers that making use of the existing defined term “NEM” in clause 3.1.4(a)(8) would improve consistency of the NER. | Replace “national electricity market” with “*NEM”*. | 3.1.4(a)(8) |
| 3 | Clause 3.1.4(a)(9) uses the word "procure”, whereas “acquire” is consistently used elsewhere in the NER. For consistency of the NER, AEMO considers that the reference to “procure” in clause 3.1.4(a)(9) should be replaced with "acquire". | Replace “procure” with “acquire". | 3.1.4(a)(9) |
| 4 | Clauses 3.1.4(a1)(2) and (a1)(3) requires AEMO to review, prepare and publish a report on “the operation and effectiveness of the *spot market* for *market ancillary services* within the overall *central dispatch* “ and “the potential future implementation of a usage market for *market ancillary services”*.  AEMO completed the FCAS Review in July 2007 and we consider that this obligation can now be deleted. | Delete clauses 3.1.4(a1)(2) and (a1)(3). | 3.1.4(a1)(2), (a1)(3) |
| 5 | Clause 3.1.4(a1)(4) requires AEMO to review, prepare and publish a report on “the provision of network control ancillary services including:   1. a review of the responsibilities of AEMO and Transmission Network Service Providers for the provision of reactive power support; 2. a review of the formulation of those generic network constraints within central dispatch that are dependant on the provision of network control ancillary services; and 3. a program to assess the potential implementation of market mechanisms for the recruitment and dispatch of NCAS*”*.   AEMO completed the NCAS Review (referred to as the NSCS Review) on 18 December 2009 and we consider that this obligation can now be deleted. | Delete clause 3.1.4(a1)(4). | 3.1.4(a1)(4) |
| 6 | Clause 3.1.4(a2) outlines AEMO’s obligations in relation to the NCAS and FCAS Reviews in clause 3.1.4(a1), including following the Rules consultation procedures, completing each review within 12 months and submitting any Rules changes within 3 months of the review’s completion. As both the NCAS and FCAS Reviews are completed, AEMO considers that this clause is now redundant and can be deleted. | Delete clause 3.1.4(a2). | 3.1.4(a2) |
| 7 | The heading of clause 3.2.4 is “Ancillary services function”. AEMO considers that a minor change should be made to align the header to the subject matter of the clause. | Rename the header of clause 3.2.4 from “Ancillary services function” to ““Non-Market ancillary services function”. | 3.2.4 |
| 8 | For consistency of the NER, AEMO considers that it is grammatically incorrect to have the words “which are” before “acquired” in clauses 3.11.1(b) and (c). | Delete “which are” before “acquired”. | 3.11.1(b),(c) |
| 9 | For consistency of the NER, AEMO considers that clause 3.11.4(a) should be amended to make use of the proposed defined term “NSCAS description”. | Add the proposed defined term *"*NSCAS description" after “detailed description of each type of network support and control ancillary service”. | 3.11.4(a) |
| 10 | For consistency of the NER, AEMO considers that clause 3.11.4(b) should be amended to make use of the proposed defined term “NSCAS quantity procedure”. | Add the proposed defined term "NSCAS quantity procedure" after “procedure for determining the location and quantities of each type of network support and control ancillary service required”. | 3.11.4(b) |
| 11 | Clause 3.11.4(b) uses the words "each kind of”, whereas “each type of” is consistently used elsewhere, some examples of this include clauses 3.8.7A, 3.11.4A(d), (d)(2) and 3.13.4(f)(4)). For consistency of the NER, AEMO considers that the reference to “each kind of” in clause 3.11.4(b) should be replaced with “each type of”. | Replace "each kind of" with "each type of" network support and control ancillary service. | 3.11.4(b) |
| 12 | For consistency of the NER, AEMO considers that clause 3.11.4(c) should be amended to make use of the proposed defined term “NSCAS description”. | Replace “making or amending the descriptions…under clause 3.11.4” with proposed defined term *"*NSCAS description". | 3.11.4(c) |
| 13 | For consistency of the NER, AEMO considers that clause 3.11.4(d) should be amended to make use of the proposed defined term “NSCAS quantity procedure”. | Replace “making or amending the procedures…under clause 3.11.4” with proposed defined term *"*NSCAS quantity procedure ". | 3.11.4(d) |
| 14 | For consistency of the NER, AEMO considers that clause 3.11.5(a) should be amended to make use of the proposed defined term “NMAS tender guidelines”. | Add the proposed defined term "NMAS tender guidelines" after "in accordance with the “NMAS tender guidelines". | 3.11.5(a) |
| 15 | AEMO has proposed that “NMAS tender guidelines” should be a defined term. AEMO therefore considers that the term “NMAS tender guidelines” should be italicized in clauses 3.11.5(b), (c) and (f). | Italicize “NMAS tender guidelines”. | 3.11.5(b),(c),(f) |
| 16 | Clause 3.11.5(h) uses the word “tender” whereas “call for offers” is consistently used elsewhere in the NER. AEMO considers that it is more accurate to refer to it as a “call for offers”. | Replace "tender" with "call for offers". | 3.11.5(h) |
| 17 | The first sentence of Clause 3.11.5(h) reads:  “Where the tender is for *network control ancillary services*, in assessing any offers submitted in response to a call for offers under this clause 3.11.5, *AEMO* must seek to acquire the quantity of the relevant kind of *network support and control ancillary services* determined in accordance with clause 3.11.4 by competitive tender and in accordance with this clause 3.11.5(h)”.  This is ambiguous as it implies that, in assessing offers, AEMO must acquire NSCAS by a competitive tender process - but the latter process must logically precede the former not the other way around. | Replace sentence with “Where the call for offers is for the acquisition of *network control support and ancillary services*, in assessing any tenders submitted to meet a particular *NSCAS need*, *AEMO* must first determine whether those tenders are competitive.”  This clarifies that the aim is for AEMO to determine whether a set of tenders for a particular NSCAS needare competitive. | 3.11.5(h) |
| 18 | Clause 3.11.5(h) uses the term “conforming offer” whereas “conforming tender” is consistently used elsewhere in the NER. AEMO considers that it is more accurate to refer to it as a “conforming tender”. | Replace "conforming offer" with "conforming tender" | 3.11.5(h) |
| 19 | Clause 3.11.5(h) refers to “persons that submitted conforming and non-conforming tenders selected by AEMO” in the contract negotiation process where tenders are deemed non-competitive. AEMO commonly uses the short-hand version “preferred tenderers” to refer to those persons and considers clause 3.11.5(h) should be amended to make use of that term. | Define "preferred tenderers", by adding “preferred tenderers” at the end of “persons that submitted conforming and non-conforming tenders selected by AEMO”. | 3.11.5(h) |
| 20 | Clause 3.11.5(h) uses the words "each kind of”, whereas “each type of” is consistently used elsewhere, some examples of this include clauses 3.8.7A, 3.11.4A(d), (d)(2) and 3.13.4(f)(4)). For consistency of the NER, AEMO considers that the reference to “each kind of” in clause 3.11.5(h) should be replaced with “each type of”. | Replace "each kind of" with "each type of" network support and control ancillary service. | 3.11.5(h) |
| 21 | AEMO considers that there is a minor Rules convention error in clause 3.11.5(h)(1), the reference to clause 3.11.5(h)(2) should state "sub-paragraph (h)(2)". | Replace "clause 3.11.5(h)(2)" with "sub-paragraph (h)(2)". | 3.11.5(h)(1) |
| 22 | Clause 3.11.5(i) refers to Registered Participants” [selected by AEMO] in the process for dealing with a breakdown of negotiations. AEMO commonly uses the short-hand version “preferred tenderers” to refer to those persons and considers clauses 3.11.5 (i) should be amended to make use of that term. | Replace all instances of "Registered Participants” [selected by AEMO] with "preferred tenderers" | 3.11.5(i) |
| 23 | AEMO considers that there is a minor Rules convention error in clause 3.11.5(j), the reference to clause 3.11.5(k) should state "paragraph (k) ". | Replace "clause 3.11.5(k)" with "paragraph (k)" | 3.11.5(j) |
| 24 | AEMO considers that there is a minor Rules convention error in clause 3.11.5(l), the reference to clause 3.11.5(a) should state "paragraph (a) ". | Replace "clause 3.11.5(a)" with "paragraph (a)". | 3.11.5(l) |
| 25 | AEMO considers that there is a minor Rules convention error in clause 3.11.5(m), the reference to clause 3.11.5(l) should state "paragraph (l) ". | Replace "clause 3.11.5(l)" with "paragraph (l)". | 3.11.5(m) |
| 26 | Clause 3.11.5(m) uses the words "each kind of”, whereas “each type of” is consistently used elsewhere, some examples of this include clauses 3.8.7A, 3.11.4A(d), (d)(2) and 3.13.4(f)(4)). For consistency of the NER, AEMO considers that the reference to “each kind of” in clause 3.11.5(m) should be replaced with “each type of”. | Replace "each kind of" with "each type of" network support and control ancillary service. | 3.11.5(m) |
| 27 | AEMO considers that there is a minor Rules convention error in clause 3.11.5(n), the reference to clause 3.11.5(l) should state "paragraph (l)". | Replace "clause 3.11.5(l)" with "paragraph (l)". | 3.11.5(n) |
| 28 | Clause 3.11.5(n)(2) uses the word "procured”, whereas “acquired” is consistently used elsewhere. For consistency of the NER, AEMO considers that the reference to “procured” in clause 3.11.5(n)(2) should be replaced with "acquired". | Replace "procured" with "acquired". | 3.11.5(n)(2) |
| 29 | AEMO considers that it is necessary to clarify the words “those services” in clause 3.11.5(n)(2) as only referring to “system restart ancillary services”. | Replace "those services" with "system restart ancillary services". | 3.11.5(n)(2) |
| 30 | Clause 3.11.5(p) uses the word “tender” whereas “call for offers” is consistently used elsewhere in the NER. AEMO considers that it is more accurate to refer to it as a “call for offers”. | Replace "tender" with "call for offers". | 3.11.5(p) |
| 31 | AEMO considers that there is an error in clause 3.11.6(a)(1) and it should refer to the defined term “dispatching”. This proposed change would ensure the NER makes use of existing defined terms. | Italicize “dispatching”. | 3.11.6(a)(1) |
| 32 | AEMO considers that there is a minor Rules convention error in clause 3.11.6, the reference to clause 3.11.6 should state "under sub-paragraph (a)(1)". | Replace "pursuant to clause 3.11.6" with "under sub-paragraph (a)(1)". | 3.11.6(a)(2) |
| 33 | Clause 3.11.6(b) refers to “make … available to the *Registered Participants*”. AEMO considers that making use of the equivalent defined term “publish” in clause 3.11.6(b) would improve consistency of the NER. | Replace “make … available to the *Registered Participants*” with the equivalent defined term “publish*”.* | 3.11.6(b) |
| 34 | Clause 3.13.5(a) requires AEMO to publish costs associated with “the acquisition” of market and non market ancillary services. However AEMO can only publish information for NMAS that AEMO acquires, noting that TNSP may also acquire NMAS. AEMO considers clause 3.13.5(a) should be amended to refer to “its acquisition”. | Replace “the acquisition" with "its acquisition" of ancillary services | 3.13.5(a) |
| 35 | Clause 3.13.5(b) only refers to the publication of costs and quantities of each type of non-market ancillary service which is inconsistent with clause 3.13.5(a) that requires AEMO to also publish costs and quantities for each type of market ancillary service. AEMO considers that, consistent with clause 3.13.5(a), clause 3.13.5(b) should be amended to also refer to market ancillary services. | Insert “market ancillary services and …" before "non market ancillary services covered under existing ancillary services agreements " | 3.13.5(b) |
| 36 | AEMO considers that there is an error in clause 3.13.5(c) and it should refer to the defined term “published”. This proposed change would ensure the NER makes use of existing defined terms. | Italicize the defined term “published” | 3.13.5(c) |
| 37 | AEMO considers that there is an error in clause 3.15.6A(b) and it should refer to the defined term “ancillary services”. This proposed change would ensure the NER makes use of existing defined terms. | Italicize “ancillary services”. | 3.15.6A(b) |
| 38 | AEMO considers that there is an error in clause 3.15.8(f(2) as labels ‘TCRSP’ and ‘TCLSP’ do not exist in the NER and rather they should be ‘RTCRSP’ and ‘RTCLSP’ as used in the formulas in clauses 3.15.6A(f) and (g). | Replace 'TCRSP' and 'TCLSP ' with the correct labels 'RTCRSP' and 'RTCLSP' | 3.15.8(f)(2) |
| 39 | AEMO considers that there is an error in clauses 3.15.10C(a)(4),(b)(7)(i), (c)(3)(iii) as the labels ‘TCRSP’ and ‘TCLSP’ do not exist in the NER and rather they should be ‘RTCRSP’ and ‘RTCLSP’ as used in the formulas in clauses 3.15.6A(f) and (g). | Replace 'TCRSP' and 'TCLSP ' with the correct labels 'RTCRSP' and 'RTCLSP' | 3.15.10C(a)(4), (b)(7)(i), (c)(3)(iii) |
| 40 | Clause 4.5.1(f)(1) describes AEMO’s obligation to use its reasonable endeavours to arrange the provision of reactive power facilities and power system voltage stabilising facilities through (among other options) “contractual arrangements for ancillary services with appropriate Registered Participants”.  AEMO considers that clause 4.5.1(f)(1) should make use of the existing defined term “ancillary services agreements” to represent these contractual arrangements. | Replace “contractual arrangements for ancillary services with appropriate Registered Participants” with the defined term “ancillary services agreements”. | 4.5.1(f)(1) |
| 41 | AEMO considers that there is an error in clause 5.6A.2(c) and it should refer to the defined term “published”. This proposed change would ensure the NER makes use of existing defined terms. | Italicize the defined term “published” | 5.6A.2(c) |
| 42 | AEMO considers that there is an error in clause 5.6A.2(c)(2) and it should refer to the defined term “transmission”. This proposed change would ensure the NER makes use of existing defined terms. | Italicize the defined term “transmission” | 5.6A.2(c)(2) |
| 43 | AEMO considers that there is an error in clause 8.2.1(a1) and it should refer to the defined term “Registered Participant”. This proposed change would ensure the NER makes use of existing defined terms. | Italicize the defined term "Registered Participant” | 8.2.1(a1) |
| 44 | Participant derogation in Part 12 of Chapter 8A titled “Ancillary Services Provisions - Transitional Arrangements” relates to NEMMCO’s NMAS Invitation to Tender issued on 18 October 2000, which has been completed. AEMO considers that this derogation should be deleted. | Delete participant derogation titled “Ancillary Services Provisions - Transitional Arrangements”. | 8A Part 12 |
| 45 | AEMO considers that the long-hand and abbreviated versions of a defined term should not appear separately to minimise ambiguity and the risk of changes to one but not the other. | Delete the separately defined term "NMAS” and merge with the defined term “non-market ancillary service” to create the composite defined term “non-market ancillary service or NMAS” | 10 |
| 46 | The NER has multiple references to the "NMAS tender guidelines", and for consistency AEMO considers that “NMAS tender guidelines” should be a defined term. | Add the proposed defined term "NMAS tender guidelines" as defined in clause 3.11.5(a). | 10 |
| 47 | AEMO considers that the long-hand and abbreviated versions of a defined term should not appear separately to minimise ambiguity and the risk of changes to one but not the other. | Delete the separately defined term "SRAS” and merge with the defined term “system restart ancillary service” to create the composite defined term “system restart ancillary service or SRAS” | 10 |
| 48 | Transitional and Savings Rule 11.12 titled “Rules consequent on making of the National Electricity Amendment (Efficient Dispatch of Regulation Services) Rule 2007” relates to preparation for transition into the Rule that commenced on 1 Jan 2009, which has been completed. AEMO considers that this Transitional and Savings rule should be deleted. | Delete Transitional and Savings rule 11.12 | 11.12 |