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Dear Mitchell

SRAS Rule Change – Clarification on proposed system restoration support service

In discussions following AEMO's submission to the AEMC's consultation paper on the system restart ancillary services (SRAS) rule change proposals, AEMO has become aware that there may be some confusion regarding the intent and purpose of the proposed system restoration support service.

AEMO's rule change request proposed to expand the SRAS definition to include a new 'system restoration support service'. These services may be necessary in some areas now, and in future as the power system continues its transformation, to ensure that restoration can be reliably sustained and expanded to facilitate load restoration network-wide.

However, AEMO wishes to clarify that system restoration support services are not intended to replace or in any way reduce the existing requirements to submit and comply with local black system procedures (LBSPs). The LBSP rules and guidelines reflect the underlying expectation that all generators and network service providers will operate their equipment in accordance with its declared capabilities, subject to its status and power system conditions at the time of a black system event. The basic SRAS concept involves the procurement of a limited number of key services to start the restoration process by energising a transmission element, then propagating through the network to other generators and load with the necessary properties and capability to continue that restoration.

AEMO's proposal does not signal an intent to move away from that concept. There is no expectation that those intervening generators would be contracted for, in effect, operating in accordance with the applicable expectations in their LBSP and performance standards. In the very rare event of a black system, the orderly restoration of the system and resumption of the market naturally benefits all generators, as well as consumers.

To date, system restart plans have assumed sufficient availability of synchronous generation and other facilities inherently capable of supporting restoration to within objectively reasonable timeframes.

The role of system restoration support services would be to fill an expected gap in the capability of the power system to continue the restoration process. In other words, these services would

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be procured if needed to provide a capability that may not otherwise be available under a range of reasonably anticipated restoration conditions. Examples of where procurement of a restoration support service may be necessary include:

- Retirement or withdrawal of non-SRAS contracted plant in part of an electrical sub-network which will inhibit or unreasonably delay restoration. This could include retirement of either synchronous generators or dynamic reactive power support plant.
- Changes in the network that could either provide an opportunity with minimal investment to make a material contribution to restoration, or that could inhibit/unreasonably delay restoration.
- Changes in generation dispatch patterns, reducing the likely availability of generation with the inherent capability to assist restoration within acceptable timeframes. For example, if there is greater probability of major coal fired generators needing to be restarted from cold, the timeframe and risk of successful restoration would increase substantially.
- An abundance of asynchronous generation in some parts of the network, which previously has not been considered to assist with restoration.
- Changes within distribution networks, particularly increased distributed energy resources, which reduce availability of stable load to support restoration.

If you have any further questions about our proposed restoration support service or would like further background on this request please contact Babak on 03 9609 8344 or at Babak.Badrzadeh@aemo.com.au.

Yours sincerely



Kevin Ly

Group Manager - Regulation

cc:

Attachments: