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Christiaan Zuur
Australian Energy Market Commission
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Dear Christiaan

Submission: Consultation Paper on Enhancing Operational Resilience in Relation to Indistinct Events Rule

CS Energy welcomes the opportunity to provide a submission to the Australian Energy Market Commission's (**AEMC's**) *Consultation Paper - Enhancing Operational Resilience in Relation to Indistinct Events (Consultation Paper)*. CS Energy is supportive of ensuring frameworks are flexible and adaptive to the changing power system needs.

About CS Energy

CS Energy is a Queensland energy company that generates and sells electricity in the National Electricity Market (**NEM**). CS Energy owns and operates the Kogan Creek and Callide B coal-fired power stations and has a 50% share in the Callide C station (which it also operates). CS Energy sells electricity into the NEM from these power stations, as well as electricity generated by other power stations that CS Energy holds the trading rights to.

CS Energy also operates a retail business, offering retail contracts to large commercial and industrial users in Queensland, and is part of the South-East Queensland retail market through our joint venture with Alinta Energy.

CS Energy is 100 percent owned by the Queensland government.

General comments

The resilience of a power system is a function of its physical characteristics and this is likely to change as the NEM transitions to a system with more Variable Renewable Energy (**VRE**). At the same time, the system security risk profile is broadening due to increased reliance on weather fuelled technologies and the increasing impact of weather-related phenomena such as storms, bushfires and lightning.

The National Electricity Rules (**NER**) are necessarily broad and their generality has led to interpretational differences in their application as demonstrated in the Review of the Black System Event in South Australia in 2016. This consultation seeks to address these concerns through the establishment of an "indistinct" events category and building on the existing protected events framework to manage such events.

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CS Energy does not consider that the proposed approach represents the most efficient or adaptive framework for ensuring the future resilience of the NEM. The AEMC proposal perpetuates the ambiguity in existing frameworks by encasing indistinct events in a standalone framework rather than developing an integrated, fit-for-purpose approach to manage the system's changing dynamics. CS Energy considers:

- The current frameworks to be adequate to capture the changing nature of events, whether distinct or indistinct. Ambiguity arises in their application as operational experience has focused on traditional events and thus has created an interpretation footprint;
- Condition-dependent indistinct events should be managed via the existing reclassification framework. This framework already employs a probabilistic approach to assessing events and there is no clear articulation as to why indistinct events could not be incorporated; and
- The proposed protected operation framework, while intended to be more probabilistic, appears to be more binary and deterministic than existing contingency frameworks.

CS Energy acknowledges the need to remove ambiguity from the NER and is supportive of changing the definition of contingency events to more explicitly capture indistinct events. This is akin to other definitional changes to reflect the changing technology and environment such as the antiquated definition of energy generation requiring mechanical motion.

CS Energy also suggests that the AEMC performs a holistic assessment of current frameworks including the efficacy of the protected events framework to date and the broader protection schemes that can be utilised to manage contingency events. In CS Energy's view, these frameworks, with appropriate accountability on their operational management, represent the most efficient, effective and flexible means to maintain the resilience of the NEM.

Our detailed comments on the Consultation Paper are set out in the Attachment.

If you would like to discuss this submission, please contact Alison Demaria (Market Regulatory Manager) on 0407 548 627 or ademaria@csenergy.com.au or Henry Gorniak (Power System and Market Specialist) on 0418 380 432 or hgorniak@csenergy.com.au.

Yours sincerely



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ATTACHMENT

The changing technology mix in the power system is changing its physical characteristics including its resilience, where AEMC has defined resilience to be the ability of a power system to avoid, recover and learn from high-impact, low-probability (**HILP**) events.¹ There are currently frameworks in place to manage system resilience while other mechanisms that will contribute to enhanced resilience such as the procurement of essential system services are being developed.

Separate to system resilience, the nature of events that may impact the power system are changing, driven largely by weather-related phenomena. This presents an evolving risk profile that needs to be factored into system operations, with frameworks appropriately empowering AEMO to act when required to the level required.

The review of the 2016 South Australian Black System Event (**BSE**) revealed some ambiguity in the application of the NER with the Australian Energy Market Operator (**AEMO**) and the Australian Energy Regulator (**AER**) having conflicting interpretations of the actions AEMO was able to undertake in the lead up to the event, specifically regarding the feathering of wind farms.²

Clarifying the operational remit of AEMO in managing such new risks is paramount and CS Energy is supportive of this being reflected in potential changes to the NER. However, CS Energy is not convinced that the proposal set out in the Consultation Paper represents the best approach and encourages the AEMC to broaden its consideration.

It was anticipated that many of the areas of work arising from the BSE review were to be progressed across 2020 via its industry Technical Working Group (**TWG**), especially discussions related to Option B in this Consultation Paper.³ This has not occurred with no meetings held in 2020, and this consultation does not appear to provide an avenue to appropriately explore those aspects.

The Consultation Paper acknowledges some of the interactions with the Energy Security Board's (**ESB's**) NEM Post 2025 market reform program, and CS Energy suggests that there may also be interaction with the Transmission Access workstream given the potential location and characteristics of Renewable Energy Zones (**REZs**) which may be impacted in abnormal conditions and are currently captured in operational procedures with respect to their network connection.⁴ Regardless, further coordination is needed in the approach to ensure that frameworks are adaptive to the continual evolution of the power system rather than taking an incomplete approach. Decisions made regarding the approach to contingency events in this consultation may have unintended impacts on future work.

CS Energy does agree with the AEMC's rationale to include the risks of climate change adaptation and mitigation in the frameworks under development as this will be a key driver of future weather-related risks. However, unless this is explicit in the NER, whether through the National Electricity Objective (**NEO**) or elsewhere, similar issues regarding ambiguity of AEMO's ability to act may emerge.

¹ AEMC, [Consultation Paper – Enhancing Operational Resilience to Indistinct Events](#), January 2021, p.2

² AEMC, [Review of the Black System Event in South Australia on 28 September 2016](#), April 2019

³ *Ibid*, p.120

⁴ AEMO, SO_OP3715

1.1. Understanding the Challenge to be Addressed

The challenge in managing the changing nature of events is rooted in the application of the NER which has to date been limited to “traditional” contingency events that involve discrete elements. This does not mean however that the current regulatory framework is restricted to these events; rather that operational experience has created an interpretation footprint that represents the challenge to address here. The AEMC itself states that “*the existing system security framework is focused on managing definable, distinct risks that typically occur under a historical generation mix*”⁵ which acknowledges that the framework is not required to focus on these events alone.

As defined in the NER:

- A contingency event means an event affecting the power system which AEMO expects **would be likely to involve** the failure or removal from operational service of one or more generating units and/or transmission elements;
- A credible contingency event means a contingency event the occurrence of which AEMO considers to be reasonably possible in the surrounding circumstances including the technical envelope. **Without limitation**, examples of credible contingency events are likely to include:
 - The unexpected automatic or manual disconnection of, or the unplanned reduction in capacity of, one operating generating unit; or
 - The unexpected disconnection of one major item of transmission plant (e.g. transmission line, transformer or reactive plant) other than as a result of a three-phase electrical fault anywhere on the power system.
- A non-credible contingency event is a contingency event other than a credible contingency event. **Without limitation**, examples of non-credible contingency events are likely to include:
 - Three phase electrical faults on the power system; or
 - Simultaneous disruptive events.

CS Energy challenges the AEMC’s views that the NER restricts consideration of indistinct events but does support the intent to more explicitly capture emerging risks in the framework to reduce ambiguity.

The AEMC’s proposed definition of indistinct events overlaps with the definitional scope of non-credible contingency events, and thus CS Energy does not agree with the treatment of indistinct events as separate to non-credible contingency events. CS Energy also questions the assertion that only distinct events can be credible events. In CS Energy’s view, these definitions perpetuate the current ambiguity in the system security frameworks. The AEMC should reconsider this approach given:

- Developing a separate regulatory framework for indistinct events contradicts the stated need for flexible and adaptive arrangements for a power system that will increasingly experience new modes of failure. Given indistinct events will ultimately require a

⁵ AEMC, [Consultation Paper – Enhancing Operational Resilience to Indistinct Events](#), January 2021, p.5

quantification of their risk, there is no clear argument as why they could not be considered a subset of non-credible contingencies;

- Work underway in essential system services and reserve services has identified ramping events caused by the aggregate variability of VRE as potential system security events despite their indistinct classification. This conflicts with the consideration in the consultation paper of indistinct events being HILP only;
- While multi-factor analysis is required for assessing indistinct events, the models and tools are available and will need to be developed as the power system transitions to more VRE regardless. This probabilistic characteristic needs to be embedded in system security frameworks and is already a feature of reclassification; and
- The proposed approach does not align with the outcomes-focused contingency frameworks. Whether distinct or indistinct, they are all security events which will impact the power system and need to be managed. Adding layers to the frameworks will be inefficient as discussed below in the context of the existing protected events framework.

CS Energy agrees that it will be “*important to have a contingency event definition which is clear as to its applicability to the range of sources of risk to power system security*”⁶ to remove ambiguity but encourages the AEMC to reconsider the approach and aim to deliver the most efficient outcome.

As the NEM transitions, the existing definitions will need to be challenged to better reflect the characteristics of the power system and its efficient operation. A perfect example was earlier definitions of energy generation which stipulated kinetic motion as the required characteristic. This definition precluded solar generation among others but rather than prohibiting solar connections or adding new categories of generation, the definition was changed to be more reflective of all generation technologies.

CS Energy thus does not agree with the proposed framework in the Consultation Paper and encourages the AEMC to consider indistinct events within the existing contingency frameworks as this will likely result in a more flexible, effective and efficient arrangement.

1.2. Proposed Framework

Further to introducing the definition of indistinct events, the Consultation Paper divides these into two categories:

- *Standing indistinct events* which can occur at any time and under any conditions, with the cited examples being cyber-attack, protection system malfunction or unpredictable responses from new technologies to power system conditions; and
- *Condition-dependent indistinct events* which only occur and become more severe during abnormal conditions, with the cited examples being equipment failure due to severe, wide area storms or bushfires.

Standing indistinct events are proposed to be managed under the existing protected events framework while a new protected *operations* framework is proposed for condition-dependent events. The latter in turn would be further categorised into pre-defined and ad hoc operations.

⁶ AEMC, *Ibid*, p.18

CS Energy disagrees with the creation of a standing indistinct events category and considers it superfluous to current frameworks as risks that could occur at any time and under any conditions fall within the licence to operate of AEMO, Network Service Providers (**NSPs**) and participants. For example, the threat to cyber-security is ubiquitous and measures are employed to manage this as part of business as usual. If AEMO requires investment in its operational infrastructure for cybersecurity or needs to update models, the current funding processes are appropriate, and actions can be budgeted. Similarly, generator performance standards are developed via a thorough risk assessment to understand these standing risks, and any residual risks should not be actively managed.

The justification for the protected operations framework for condition-dependent events is based on the argument that the current contingency frameworks are binary and deterministic. CS Energy disagrees with the premise. It is the operational processes and application of the frameworks that are binary, deterministic and underpinned by likelihood. The introduction of a protected operations framework only exacerbates this as it adds additional binary layers through the declaration of an event while imposing restrictions via the associated criteria and guidelines.

It is true that the protected events framework doesn't necessarily accommodate indistinct events explicitly, but this also doesn't imply that the framework as proposed is the most efficient solution. The proposed protected operations framework requires AEMO to identify a range of events, assessed against set criteria and approved by the Reliability Panel while also granting AEMO the ability to employ ad hoc protected operations for those risks not pre-defined with requirements on reporting and governance on the latter. CS Energy has several concerns with this approach including:

- It is cumbersome, inefficient and duplicative of existing processes. Given this unnecessary complexity and undermining of existing processes, it is difficult to see how it will provide more flexibility;
- Classifying condition-dependent events based on set criteria is counter-intuitive to the Consultation Paper's argument that these risks are harder to define, and it is likely that the criteria (and therefore the application of it) will be overly restrictive (and repeat current history which the consultation is trying to address);
- It is proposed that AEMO may elect to take actions above mitigating a cascading failure to avoid load shedding for events under this classification, but this is not necessary. This introduces ambiguity and blurs the boundaries between these events and "normal" contingencies.⁷
- The NEM operates to a clear set of operational standards and metrics. The introduction of protected operation based on unknown criteria distorts this outcomes-based approach, and will add complexity to modelling and participants' planning of resources and commitments; and
- The framework as proposed does not appear to satisfy the underlying principles of effective operational processes. Any framework must have criteria that is operationally implementable, that is, transparent, replicable, able to be consistently applied with outputs the same with similar inputs.

⁷ *Ibid*, p.28

1.3. Existing Frameworks

CS Energy is disappointed that the AEMC has not included an assessment of how effective the current protected events framework has been both for the market and for AEMO's ability to operate as required to maintain system security prior to their proposed expansion.

Only two protected events have been declared by AEMO to date. These constrained the Heywood Interconnector to 250 MW, the first in August 2019 and the second (declared in a Protected Event Market Notice and subsequently cancelled in a General Market Notice) in January 2020.⁸ However, analysing the market notices more broadly suggests that AEMO has resorted to the General Market Notice process to develop a similar outcome to the protected events framework while circumventing it, a view that was confirmed by both AEMO and AER in the BSE TWG discussions held on 16 August 2019.⁹ One may infer that the protected event frameworks and parameters are constraining AEMO operations rather than facilitating, and thus do not have a "fit-for-purpose" application at present which is unlikely to be resolved with the addition of further layers.

CS Energy is also concerned about the accountability frameworks that would need to be established for indistinct events, and how adherence to them will be managed particularly for ad hoc protected operations. Under the current frameworks, AEMO is required to develop and publish criteria for deciding whether any non-credible contingency has become "reasonably possible" given abnormal conditions. In the majority of instances this has not been the case with detail limited to the generic statement "*Non-credible contingency event more likely to occur due to the existence of abnormal condition/s*". This proves challenging in identifying what risk was being managed by AEMO and the subsequent signals to the market. Appendix A tabulates some examples.

It is not unreasonable to assume that the lack of transparency behind the decision-making within the current framework will be extended into any indistinct events framework particularly as AEMO navigates the transition. This concern is supported by indications in the Consultation Paper that AEMO is not completely supportive of this framework.¹⁰ Given AEMO is the party that will be obligated under the arrangements, it is an imperative that its concerns are explored prior to developing this proposal further.

Furthermore, in CS Energy's view, the introduction of ad hoc protected operations may set a dangerous precedent that facilitates a more reactive approach to system operations. As has been recently highlighted, proactive identification of emerging risks and required actions has not been performed effectively to date by AEMO¹¹, and CS Energy is concerned that allowing ad hoc intervention may foster a reactive approach in its application. AEMO has a challenging role to manage the transition with many competing priorities. Despite being intended as a safety net, ad hoc protected operations may at times be inadvertently relied upon and the guidelines not applied consistently. Given this, it is difficult to understand how the proposed framework here will deliver efficient and effective outcomes for AEMO, the market and consumers.

This concern is reinforced by the need to establish an explicit requirement on AEMO to prepare and publish a General Power System Risk Review (**GPSRR**). This type of assessment is the embodiment of a system operator's core remit; identify, understand and prepare for emerging challenges to power system security and reliability. This function is central to the obligations as set out in Chapter 5 of the NER and should be embedded within

⁸ 8 August 2019, General Market Notice 69177, 69182 and 22 January 2020, General Market Notices 72872, 72843

⁹ AEMC, Review of Black System Event in South Australia, [Technical Working Group 16 August 2019](#)

¹⁰ AEMC, *Op Cit*, p.24

¹¹ Infigen, [Submission to AEMO Consultation on NEM Settlements Under Zero and Negative Demand Conditions](#), December 2020

the operational paradigm rather than being viewed as a precursory step in a protected events framework. Given that discussions centre around the rapid transformation of the power system, the publication of the GPSRR every two years is likely to be insufficient and reactive to operational needs.

CS Energy encourages the AEMC to re-examine its approach to indistinct events to better balance the objectives of flexibility and effectiveness including:

- Assessment of the efficacy of the existing protected events frameworks and other protection schemes to identify any potential duplication;
- Proper consideration of redefining its interpretation of contingency events and their frameworks to better encapsulate the changing power system, including the need to progress towards incorporating more sophisticated probabilistic risk assessments;
- Cease consideration of the protected operations framework and instead focus on indistinct events as a subset of non-credible contingencies. This may include expanding the reclassification framework given its intent is to deal with indistinct risks that only become more probable where abnormal conditions arise;
- Develop clear operational metrics for system resilience to inform the criteria in reclassification frameworks; and
- Explore frameworks to improve the compliance and accountability for non-credible events and their reclassification, and institute clear governance arrangements.

1.4. Consultation, Transparency and Oversight of Contingency Frameworks

Although CS Energy is not supportive of the proposed framework, comments on some of its aspects are provided below.

The consultative obligations on AEMO are proportionate to the benefits as to how its power system operations impact the market, and it is only through consultation and oversight that a proper assessment of the operational and economic trade-offs can be made. However, a framework for consultation is only sufficient if the consultation process itself is inclusive and effective. Experience to date with the Power System Frequency Risk Review (**PSFRR**) has included poor communication about the initiation of consultation and a consultation period of only two weeks. This is reflected in the fact that the 2020 PSFRR Stage 1 received only two submissions and the second stage only three. The market has also had no visibility on the eight key recommendations arising from the 25 August 2018 power system event.¹² These processes will need to reflect diligent consultation for the best outcome for consumers. CS Energy acknowledges that AEMO is striving to improve its engagement process and this is welcomed.¹³

In particular, the criteria and guidelines for protected operations must have thorough consultation and oversight to ensure they reflect the underlying objectives. This includes the proposed cost-minimisation frameworks which should include clear decision-making parameters on what constitutes an event that needs to be protected.

Responsibility for the guidelines for protected operations and the criteria for determining the events to be protected should sit with the Reliability Panel. The guiding principles for the

¹² AEMO, [Report on Queensland and South Australia Separation Event on 25 August 2018](#), January 2019

¹³ AEMO, [Reviewing AEMO's Engagement Model](#)

Reliability Panel will need to facilitate consistent and transparent decision-making. This would give the market more certainty and confidence and will lead to the most efficient outcome.

Accountability frameworks will need to be strengthened given the lack of information on reclassified events that is currently provided to the market and the more nebulous nature of indistinct events. It is important that any protected operation results in the most efficient outcomes for consumers. In this respect, CS Energy is not opposed to the issuance of market notices as per current practice but these need to be complete with the appropriate level of detail and timeliness.

Appendix A

The table below outlines events where the prevailing conditions were close to but not exactly within the parameters required to trigger a protected event but where AEMO utilised the reclassification process.

Region(s)	No of events	Comments
South Australia	2	<p><u>Protected events advice</u>: the loss of multiple transmission elements causing generation disconnection in the South Australia region during periods where destructive wind conditions are forecast by the Bureau of Meteorology.</p> <p>No further description of the risk to be managed given.</p>
	35	<p><u>General Notice</u>: 35 instances when AEMO has identified that a non-credible contingency event is more likely to occur because of the existence of abnormal conditions namely severe weather in the SA region. No description of the event was provided; however, the majority of the instances triggered the actions allowable under the protected event (invoked constraint I-VS_250, on occasions I-VS_250 & I-SV_250.)</p>
Victoria	1	<p>This event description appropriately highlights the risk:</p> <p><u>General Notice</u>: Based on advice received from AUSNET, AEMO has declared an abnormal condition associated with an increased risk of trip of the following transmission lines in Victoria, from which the conclusion is that a non-credible contingency event more likely to occur due to existence of abnormal condition/s - Vic region. GTS - KTS 1 220 kV line and GTS - KTS 3 220 kV line GTS - MLTS 1 220 kV line and GTS - MLTS 2 220 kV line BETS - FVTS - SHTS 220 kV line and BATS - BETS 220 kV line MLTS - SYTS 1 500 kV line and MLTS - SYTS 2 500 kV line</p>
	1	<p>AEMO has identified that a non-credible contingency event is more likely to occur in the VIC region because of the existence of abnormal conditions, namely the continuing bushfire conditions for Monday 6 January 2020.</p> <p>As at the time of this notice the criteria for reclassification of any non-credible contingency event have not been met, however there is a possibility of bushfires impacting multiple transmission elements in its vicinity. Conditions can change rapidly and potentially impacted plant may change. Further notices will only be published to advise of any reclassification, or when the abnormal conditions have ceased to impact the likelihood of a non-credible event occurring.</p> <p>The risk has not in this case been quantified through identification of the affected transmission lines and no market signals provided on potential constraints.</p>

	3	<p>AEMO has identified that abnormal conditions exist in the Victoria region, namely severe weather which increases the risk of a contingency event occurring in the Victoria weather forecast districts Mallee and North Country.</p> <p>Some events utilised constraint I-NIL_NW_SW_RISK; on occasions detailed the non-credible contingency event</p> <p>While indicating the constraint to be invoked, this market notice still failed to quantify the risk or provide sufficient detail.</p>
Victoria/NSW	1	<p>AEMO has identified that abnormal conditions exist in the Victoria and NSW region, namely severe weather which increases the risk of a contingency event occurring in the Victoria weather forecast districts Mallee, Wimmera, North Country, South West, Central and North Central and the NSW weather forecast districts Lower Western and Riverina.</p> <p>Invoked constraint I-NIL_NW_SW_RISK but again no description of the risk</p>
Victoria/SA	1	<p><u>General Notice:</u> AEMO has identified that a non-credible contingency event is more likely to occur in the South west and Central districts of Victoria and much of the South Australia region because of the existence of abnormal conditions namely severe weather.</p> <p>No quantification provided to the market.</p>
SA/Victoria/NSW	2	<p>The Bureau of Meteorology has issued Severe Weather Warnings for Damaging Winds for parts of the South Australia, Victoria and New South Wales regions.</p> <p>AEMO has identified that a non-credible contingency event is more likely to occur because of the existence of abnormal conditions namely severe weather in the above regions. There is a possibility of severe weather impacting multiple transmission elements.</p> <p>The risk was not quantified and although constraint I-VS_250 was invoked, this is inconsistent with the advice on the regional risk.</p>
NSW	1	<p><u>General Notice:</u> AEMO has identified that abnormal conditions exist in the NSW region, namely DAMAGING WINDS and HEAVY RAINFALL in the Snowy Mountains and South West Slopes weather districts which increases the risk of a contingency event occurring.</p> <p>What this contingency event is has not been identified or communicated to the market.</p>
	1	<p>As a result of recent bushfires and until inspection of transmission assets can be completed, the ability of some transmission system elements in the NSW region to withstand severe weather conditions remains uncertain.</p> <p>Specifically, the possibility of multiple contingency events increases when DAMAGING WINDS or HEAVY RAINFALL conditions are present in the areas surrounding Upper Tumut and Lower Tumut transmission stations, in the following weather districts: Snowy Mountains, South west Slopes</p> <p>In the event of such abnormal weather conditions present in these weather districts AEMO will invoke the following constraint sets I-VN_0500, I-NV_0500</p>

		The identification of multiple contingency events has not occurred, particularly the transmission lines at risk and the only constraints publicised relate to the interconnector flow.
	1	<p>AEMO has identified that abnormal conditions exist in the NSW region, namely DAMAGING WINDS and HEAVY RAINFALL in the Snowy Mountains and South West Slopes weather districts which increases the risk of a contingency event occurring.</p> <p>Given the increased risk, AEMO has applied the following constraint to manage the impact of any such contingency event: I-VN_0500, I-NV_0500</p> <p>Further notices will only be published to advise of any additional limitations, or when the abnormal conditions have ceased to impact the likelihood of a contingency event occurring.</p>
	1	<p>AEMO has identified that a non-credible contingency event is more likely to occur in the NSW region because of the existence of abnormal conditions, namely the continuing bushfire conditions for Monday 6 January 2020. As at the time of this notice there is a possibility of bushfires impacting multiple transmission elements in NSW on Monday 6 January 2020.</p> <p>Conditions can change rapidly and potentially impacted plant may change. Further notices will only be published to advise of any reclassification, or when the abnormal conditions have ceased to impact the likelihood of a non-credible event occurring.</p> <p>This detail is generic and does not provide specific information for the market to manage its resources appropriately.</p>
	1	<p>AEMO has identified that a non-credible contingency event is more likely to occur in the NSW region because of the existence of abnormal conditions, namely severe and extreme bushfire conditions for Saturday 4 January 2020.</p> <p>Extreme Fire Danger Illawarra/Shoalhaven, Far South Coast, Monaro Alpine, Australian Capital Territory and Southern Ranges Severe Fire Danger Greater Hunter, Greater Sydney Region, and Central Ranges</p> <p>As at the time of this notice there is a possibility of bushfires impacting multiple transmission elements in NSW on Saturday 4 January 2020.</p> <p>This detail is generic and does not provide specific information for the market to manage its resources appropriately.</p>
	1	<p>AEMO has identified that a non-credible contingency event is more likely to occur in the NSW region because of the existence of abnormal conditions, namely multiple large bushfires burning across NSW.</p> <p>At the time of this notice there are two reclassifications in place, however the criteria for reclassification of any other non-credible contingency event have not been met, and there is a possibility of bushfires impacting multiple transmission elements in NSW.</p> <p>Invoked constraint I-VN_500 & I-NV_500 Invoked constraint I-VN_0450</p>