



Record No: TGD2021/28742  
Container No: TGF2021/44-01

Mathew Phillips  
Manager Wholesale Market Services  
Electricity Market & Reform Team  
Power and Water Corporation  
GPO Box 3596  
Darwin NT 0801.

By email: [market.operator@powerwater.com.au](mailto:market.operator@powerwater.com.au)

Dear Sir

### **Territory Generations response to the System Control Technical Code – proposed amendments**

Thank you for your letter to Territory Generation (TGen) dated 17 May 2021 regarding the above matter.

In general terms, TGen is supportive of the proposed amendments to the System Control Technical Code – Incident Reporting, released on 17 May 2021 by Power and Water Corporation (PWC). TGen believes the proposed amendments incorporate many positive changes.

TGen is particularly supportive of:

- The inclusion of a recommendations review period with participants prior to the finalisation of the incident reports. This will allow all parties to clarify and resolve any issues prior to the recommendations being formalised and reducing the potential of reworking recommendations.
- The introduction of a separate guideline document will assist in future reviews and limit the review to the guideline rather than opening the whole System Control Technical Code (SCTC) for review.
- The classification of incidents is more prescriptive than the current code allowing for improved clarity.
- The clarification and inclusion of timeframes for all system participants improves the governance of the process.

Please find attached TGen responses to each consultation item in the following order:

- **Attachment A** - TGen general observations and suggestions.
- **Attachment B** – Comments to ‘Proposed changes to power system incident reporting rules - Consultation paper.’
- **Attachment C** – Comments to the ‘proposed amendments to the System Control Technical Code.’
- **Attachment D** – Comments to the ‘Power System Incident Reporting Guideline.’

If you have any queries, please do not hesitate to contact Hieu Nguyen, General Counsel and Company Secretary via email [hieu.nguyen@territorygeneration.com.au](mailto:hieu.nguyen@territorygeneration.com.au) or by phone on 79792509.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Hieu Nguyen', with a long, sweeping flourish extending to the right.

Hieu Nguyen  
**General Counsel and Company Secretary**

29 June 2021

## Attachment A - TGen general observation and suggestions

From TGen's experience with incident reporting, TGen has identified other opportunities that may not have been fully covered in the proposed amendments. These include:

- Incident ratings of generator related events should be based on number of customers affected similar to those of the Network System Participants. Currently, all generator related events are classified as major, even if no customers are affected.
- Any repeat recommendations should be identified as a duplicate in the final report (recommendations) and have a reference to the primary recommendation associated with it, including the RID number in the System Control tracking sheet. This would assist in identifying and tracking duplicate actions.
- The guidelines would benefit from some clarification and distinction between firm recommendations (compliance with the code) indicating shall or must recommendations, and other recommendations that are opportunities for improvement or observations (System Participant to consider) indicating that the recommendation should be a considered. If this was adopted, it would benefit from some directions or instructions as to what is required to close each recommendation.
- TGen has a number of assets that were commissioned prior to September 2012 which were referenced by date in version 3.1 (clause 12.1) and later in version 4 (clause 12.2) of the Network Technical Code, meaning that they are considered to be compliant at the time of commissioning and effectively grandfathered. The guideline would benefit from a reference to these older assets with some clarification as to how they will be treated regarding incident recommendations.
- Under the guidelines there should be some references that participants should only be required to report on items within their area of responsibility e.g. Generation should not be reporting on feeders or under frequency load shedding (UFLS).
- There have been some recommendations that either overlap with other System Participants or have components outside their control. If one System Participant has completed their part of the recommendation, currently they can't submit or close the action as the total task is incomplete. The wording or process should allow a participant to close their part of the recommendation.
- TGen notes that the consultation and Guidelines focus on incidents being related to breaches of the first four Dispatch Principles in clause 4.3 of the SCTC. TGen believes that reportable incidents should also include breaches of the fifth and sixth Dispatch Principles.
- Incident analysis and final recommendations currently focuses on events from an asset perspective e.g. what failed, root cause, contributing factors etc. One area that is not always considered is the preplanning and economic impacts on the system and participants when an incident occurs. TGen suggests that the proposed clause 7.2.1 of the SCTC is extended to include these areas.
- Further to the above point TGen sees benefit in the incident reports being inclusive of reports on process and procedural breaches for all System Participants.

**Attachment B – Comments to ‘Proposed changes to power system incident reporting rules - Consultation paper’**

Clause	TGen Observations and suggestions
<i>Minor reportable threshold (page 3)</i>	<ul style="list-style-type: none"> <li>• It should be noted that often restoration is by feeder e.g. after a UFLS, and as such the formula of “outage minute x customers impacted” should be done on a feeder by feeder basis with a cumulative total.</li> </ul>
<i>Consultation questions (page 5)</i>	<p>The following questions are provided as a prompt for stakeholders and interested parties regarding areas that are of particular interest to System Controller:</p> <ul style="list-style-type: none"> <li>• Is the move to customer minutes an appropriate metric for incident reporting threshold? <ul style="list-style-type: none"> <li>○ TGen considers this is an appropriate measure as per its comment page 3.</li> </ul> </li> <li>• Is the approach of prescribing minor incident reporting threshold in the Guidelines reasonable in providing flexibility to adjust as the circumstances require? <ul style="list-style-type: none"> <li>○ TGen considers this is an appropriate measure</li> </ul> </li> <li>• Are the timelines for System Participants providing reports to the System Controller considered practicable? <ul style="list-style-type: none"> <li>○ Timeframes seem to be practicable and recommendations should be equal across all participants including System Controller.</li> </ul> </li> <li>• Does the Code amendment and Guidelines adequately capture the obligations for the System Controller and System Participants regarding the agreement and timeframe of actions that are reasonably required to prevent the repetition of a reportable incident? <ul style="list-style-type: none"> <li>○ In general, TGen supports the proposed changes and have made specific suggestions / observations as per attachments A, B &amp; C.</li> </ul> </li> <li>• Does the Code amendment adequately scope the content included in the draft Power System Incident Reporting Guideline? <ul style="list-style-type: none"> <li>○ In general, TGen considers the amendments adequately scope the content and have made specific suggestions / observations as per attachments A, B &amp; C.</li> </ul> </li> </ul>

**Attachment C – Comments to the ‘proposed amendments to the System Control Technical Code’**

<b><i>Proposed Clause</i></b>	<b>TGen observations and suggestions</b>
<i>7.1 (f)</i>	TGen suggests that the wording includes System Controller for: <i>“Section 7 and the obligation of System Participants to comply with recommendations”</i>
<i>Last paragraph of 7.1</i>	TGen suggests that the wording in the last paragraph includes ‘efficiently’: <i>“to ensuring that the power system operates reliably, safely, securely and efficiently.”</i>
<i>7.2.1</i>	TGen suggests that the wording ‘significant economic impacts on System Participants’ to be included. This would then take in to account operational and financial impacts of risk mitigation actions for major planned works or unforeseen incidents.
<i>General Comment</i>	The Code should define that the participant is responsible for their area of operations e.g. generation would report on generation assets only.

## Attachment D – Comments to the ‘Power System Incident Reporting Guideline’

Note:

An email was sent to PWC (31-05-2021) identifying issues (Error! Reference source not found) with the document and as of 22-06-2021 the errors remain.

Clause	TGen Observations and suggestions
1.2 Scope (page 3)	<ul style="list-style-type: none"> <li>• “The <i>Power System Controller</i> may amend or replace this Guideline from time to time to meet changing needs with respect to the reliability, safety, and security of the <i>power system</i>”.</li> <li>• This needs more detail about consultation. The new guidelines are a subordinate document to the SCTC and should require the same consultation process with System Participants and approval by the UC. This will avoid PWC unilaterally changing the guideline without providing System Participants opportunity to comment.</li> </ul>
Figure 1 (page 5)	<ul style="list-style-type: none"> <li>• TGen fully supports the introduction of requirements for a review of draft recommendations prior to finalisation of the report over 15 business days. This will allow clarification on recommendations and any shared overlap with other participants.</li> <li>• It would also be beneficial if any duplicate recommendations from previous reports are identified at the same time and updated in the spreadsheet as such and identifying the primary action and RID.</li> </ul>
2.4 (page 7)	<p>“Notifications provided by <i>System Participants</i> to the <i>Power System Controller</i> under clause 7.3.1 of the <i>SCTC</i> must be provided via email (SCOperationsPlanning.PWC@powerwater.com.au) or in such other form as notified by the <i>Power System Controller</i>, within three <i>business days</i>”.</p> <ul style="list-style-type: none"> <li>• This clause would seem in conflict with figure 1 that has a time frame of 5 business days to submit brief report to the Power System Controller.</li> <li>• The notification must set out: <ul style="list-style-type: none"> <li>○ The time and date of the incident;</li> <li>○ Duration of the incident;</li> <li>○ Power System Impacted;</li> <li>○ What occurred;</li> <li>○ Plant involved; and</li> <li>○ The impact of the incident.</li> </ul> </li> <li>• The wording is ‘must’ and participants should only be reporting on anything within their direct responsibilities. The Generator can only advise of events related to the generation business. For example, “impact of the incident” for generators is usually loss of capacity and would not include impact on the system/ network such as under frequency load sheds.</li> <li>• Notifications provided by the <i>Power System Controller</i> to the Utilities Commission and <i>System Participants</i> under clauses 7.3.3 of the <i>SCTC</i> must be via email (SCOperationsPlanning.PWC@powerwater.com.au) or in such other form as notified by the <i>Power System Controller</i>, to the Utilities Commission and relevant <i>System Participant’s</i> nominated personnel within three business days.</li> <li>• This clause would seem in conflict with figure 1 that has a time frame of 10 business days to submit brief report to the UC from time of the event and 5 business days from System Participants providing their brief reports.</li> </ul>

2.5 (page 8)	<p>“Reports must include the details appropriate (applying <i>good electricity industry practice</i>) to the consequences or potential consequences of the <i>reportable incident</i> and enable a clear determination of the root cause(s) of the <i>reportable incident</i>”</p> <ul style="list-style-type: none"> <li>• The root cause cannot always be determined however this is covered in a note further down (2.6). It would be beneficial to add a link/reference to the note: on same page (note 1).</li> </ul>
2.6 (page 8)	<ul style="list-style-type: none"> <li>• 2.6 should reference that reporting is required within the System Participants area of responsibility e.g. for their own plant.</li> <li>• 2.6 Note has “Error! Reference source not found” (format issue). This has been passed on the PWC.</li> </ul>
2.6 (page 9)	<ul style="list-style-type: none"> <li>• Table 1 should reference reporting within the System Participants responsibility e.g. for their own plant.</li> </ul>
2.7 (page 9)	<ul style="list-style-type: none"> <li>• It mentions Clause 7.3.3, but code not specified, assume it is referencing the draft SCTC.</li> <li>• There is a “Error! Reference source not found” (format issue) don’t know what it refers to. This has been passed on the PWC.</li> </ul>
2.9 (page 11)	<p>Brief reports are primarily to identify systemic issues relating to reliability and do not individually contain recommendations or actions. In circumstances where an incident should require remedial actions to be taken, the incident will be reclassified as a <i>major reportable incident</i>.</p> <ul style="list-style-type: none"> <li>• The closed status (5 of 2.9) would benefit from a timeline to review and close or reject. This is detailed in clause 3, last paragraph.</li> </ul>
Note: (page 12)	<p>2.9.2 &amp; 3 addresses what happens if the extension is rejected, however it is not clear what other methods may be e.g. example?</p>
2.10	<p>The purpose of the report is to provide visibility of investigation outcomes, identify necessary recommendation and associated agreed actions and hold <i>System Participants</i> accountable for their operating actions and decisions.</p> <ul style="list-style-type: none"> <li>• This should also be equally applied to the System Controller and System Participants.</li> </ul>