



29 June 2021

Power System Controller
Power and Water Corporation
GPO Box 3596
Darwin NT 0801

By email: market.operator@powerwater.com.au

Re: Consultation on System Control Technical Code – Power System Incident Reporting Procedures – EDL NGD (NT) Pty Ltd submission

EDL has reviewed the proposed changes to the System Control Technical Code (Code) and the Power System Incident Reporting Guideline (Guidelines), as described in the consultation paper published by the Power System Controller (Power and Water Corporation).

EDL makes the following comments to the questions posed in the consultation paper:

- 1) *Is the move to customer minutes an appropriate metric for incident reporting threshold?*

EDL agrees that customer minutes is an appropriate metric to use for an incident reporting threshold. However, EDL queries whether it is appropriate to use the same threshold for all regulated power systems. Other metrics, such as SAIDI, are effectively normalised based on the number of customers in the system. To achieve a similar effect, a different customer minutes threshold should be set for each power system and reviewed on a periodic basis.

- 2) *Is the approach of prescribing minor incident reporting threshold in the Guidelines reasonable in providing flexibility to adjust as the circumstances require?*

EDL agrees that prescribing the threshold in the Guidelines rather than the Code provides more flexibility to adjust in a timely manner. However, the appropriate consultation measures must be introduced into the Code and the Guidelines to ensure that System Participants' obligations remain regulated. EDL notes that these measures have been included in section 5.1 of the draft Guideline and section 7.5.1 of the draft Code amendment.

EDL queries why the minor and major incident reporting thresholds are based on different metrics. For consistency, customer minutes should be used for both.

3) *Are the timelines for System Participants providing reports to the System Controller considered practicable?*

EDL notes that the definition of a reportable incident has been changed to include a “reasonable” test. EDL has no visibility of the Darwin-Katherine power system nor its customers. When a generator trips, EDL cannot reasonably assess if this will have an impact on the Darwin-Katherine power system. The requirement for System Participants to report the occurrence of power system incidents that have the potential to be classified as a reportable incident to Power System Controller (7.3.1(a) in the Code amendment) is therefore not reasonable.

The Power System Controller is best placed to understand the impact, or potential impact, of an incident to the reliability or security of the power system. To remove ambiguity for System Participants, EDL suggests the following:

- The Power System Controller determines if an incident is a reportable incident based on the criteria in section 7.2.1 of the draft Code amendment; then
- The Power System Controller notifies System Participants of the reportable incident in accordance with section 2.4 of the Guidelines; then
- Once notified by the Power System Controller, this creates an obligation for System Participants to provide notification of the reportable incident within three business days (or in such other timeframe as notified by the Power System Controller in their notification).

To ensure consistency and clarity for all parties, EDL requests that standard templates are developed for the notifications and reports outlined in the Guidelines, including:

- Power System Controller notification of a reportable incident (section 2.4)
- System Participant notification of a reportable incident (section 2.4)
- System Participant Brief Report (section 2.6, Table 1)
- System Participant Final Report (section 2.7, Table 2)

The format of these reports should be attached as appendices to the Guidelines.

To ensure compliance, details for both notifications and operational communications should be clarified with System Participants before these amendments are ratified and periodically reviewed thereafter.

Provided the points above are addressed, the proposed reporting timelines are practicable.

4) *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?

EDL requires an obligation for Power System Controller to review evidence of completed actions within a set timeframe to ensure reportable incidents are closed out.

Furthermore, EDL understands the intent of imposing a six (6) month timeframe to complete an agreed action (section 2.9.1 of the Guidelines). However, EDL notes that this may not be sufficient where prolonged investigations, long lead times, and/or technical resources are required. Although section 2.9.1 allows for these timeframes to be extended, EDL requests that the approval of extension requests cannot be unreasonably withheld.

5) *Does the Code amendment adequately scope the content included in the draft Power System Incident Reporting Guideline?*

The Code amendment is adequately scoped.

Other comments:

The process to follow is not clear if a reportable incident is later reclassified from minor to major (or vice versa), or if Power System Controller determines a Final Report is required in respect of a minor reportable incident.

Should you have any questions or wish to discuss this submission further, please contact me on 08 9213 8195.

Yours sincerely,

A handwritten signature in blue ink that reads 'Neil Duffy' in a cursive, flowing script.

Neil Duffy
Commercial Manager Remote Energy
EDL