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Market Operator
Power and Water Corporation
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Dear Market Operator

Submission in relation to Plant Outage Procedure

Territory Generation (TGen) appreciates the opportunity to provide submissions in relation to the draft Plant Outage Procedure. TGen's submissions are as follows:

Section 2 Scope – inclusion of the Tennant Creek power system

Paragraph two clearly identifies the Darwin Katherine and Alice Springs regulated power systems but does not specify the Tennant Creek power system. Tennant Creek power system falls within the scope of this document and is later referred to in section 4.1 (j). For completion and consistency, TGen requests that the Tennant Creek power system be identified in this paragraph.

Section 3 General Approach

Provision of inertia and black start services

Regarding reasons for not approving outage activities, TGen notes that the following have been omitted:

- (i) Provision of inertia as defined in section 7 of the Secure System Guidelines (SSG)
- (ii) Provision of black start services

There have been recent instances where TGen outages have been declined based on the grounds above. In these instances, the inertia and black start service requirements for the power system and hence TGen's contribution towards these services/products were unclear.

TGen would like clarification whether these scenarios will be considered grounds for not approving outages in the future. TGen is concerned that this matter may not be consistently or fairly applied across all generators in regulated power systems. If these grounds are to be considered in the future, then TGen wishes to engage on how this could be consistently applied and managed across all Participants on the relevant power systems.

'First in best dressed' approach

The fourth paragraph in this section essentially proposes to introduce a 'first in best dressed' approach to outage approval. TGen believes that this approach is inequitable.

TGen has an implicit requirement to ensure there is sufficient generating capacity available at all times to meet load and reserve levels.

1. TGen provides sufficient generation to supply the entire power system and ensures that it has plant available to meet system demand plus reserves when planning plant outages.

2. No other generator is required to be concerned about ensuring there is sufficient capacity to meet system demand nor are they required to ensure there is sufficient reserve capacity available.
3. No other generator is obligated to consult with TGen about timing of planned outages to minimise the impact their planned outages in meeting the system demand plus reserves.
4. TGen refers to this implicit requirement as 'Generator of Last Resort'.
5. TGen acknowledges that the Government Reforms are seeking to address this, but these reforms are at concept stage at this point.

TGen believes that the PWC proposed 'first in best dressed' approach to approving conflicting outage requests is potentially harmful to TGen as it perpetuates the requirement for TGen to fulfill the 'Generator of Last Resort' role.

If implemented, this 'first in best dressed' approach would encourage all generators to submit all planned outages as far ahead as possible. This would likely lead to a flood of outage requests followed by significant variations being requested as outages windows approach. This is quite likely to increase the administration effort required for the outage planning process.

Generator outage support

To ensure non-discrimination, TGen proposes that all generators who are seeking to take plant out of service must provide a means of supporting the reduction of the capacity of the plant to be removed from service at the time they submit the request. This could be achieved by providing alternative generation capacity or contractual arrangements with another provider to meet the reduction in capacity resulting from the planned outage. If this were to be implemented, then it is likely that generators would sort out any conflicting outage needs amongst themselves contractually prior to requesting outages from the Power System Controller.

TGen believes this is in line with the intent of the obligations outlined in SCTC 4.4A that was introduced in version 5 in May 2015. It is noted that this clause is currently ineffective because the Guidelines identified in the clause have not been released.

Generator testing support services

When a generator proposes to test a generating unit on the power system, the Power System Controller issues a Risk Notice. When this Risk Notice places restrictions on dispatch it can affect other generators in order to facilitate the proposed testing. TGen identifies these additional restrictions on other generators as Generator Support Services. Examples of Generator Support Services include increased spinning reserve or dispatch of a plant for increased inertia requirements (for example, Frame 6 units constrained on).

TGen proposes that Generator Test Requests require that the generator seeking an outage provide a means of supporting the testing requirements imposed by the Power System Controller to allow the testing to occur. This could be by means of providing support service facilities themselves, such as battery or load bank, or by contractual arrangements with another provider.

TGen proposes that generators proposing testing of generators be required to provide a means of providing the testing support services required to support the proposed testing.

Network outage support services

TGen also proposes that the Network Operator be required to provide a means of supporting their planned outages that impact generator dispatch. If this results in the Network Operator contracting a generator for the service, it would encourage the Network Operator to consider alternative times to undertake the planned works when the impact to generator dispatch is less and make the assessment requirements by the Power System Controller easier.

Section 4 System Risk

Provision for standard servicing and minor corrective work longer than 3 days

Regarding outages that satisfy “4.1 (b) likely to take longer than 3 days”, TGen notes that routine servicing and maintenance of generator assets will generally exceed this time period and would potentially result in all planned plant outages being defined as Elevated Risks.

To assist with understanding the impact on internal processes and practices, TGen seeks clarity on any anticipated additional requirements deemed necessary in assessing and approving Elevated Risk Outages. TGen considers this timeframe to be impractical as all planned outages will be defined as Elevated Risks. TGen requests changes to this criteria to allow provision of standard servicing and minor corrective works without being regarded as an Elevated Risk.

Scheduling of outages for ‘low demand’ periods

Regarding “4.1 (j) planned to be undertaken during summer or winter if connected to the Alice Springs or Tennant Creek power systems”:

TGen acknowledges benefits associated with planning key outages during low demand periods where it is unable to avoid outages in the periods defined in sections 4.1 (i) and 4.1 (j).

TGen is concerned that generators will be incentivised to plan outages concurrently in low demand periods and seeks detail on how the Power System Controller will prioritise competing outage works planned in low demand periods and how System Security risks will be balanced with generator and network operator asset risks.

TGen requests that a fair and transparent process is developed for managing competing outages in the regulated systems.

Section 7 Short Term Outage Planning – provision for increased recall time

Section 7.1.3 makes allowance for outages of less than 24 hours provided it includes a 15-minute recall. TGen is concerned that this would be inadequate in scenarios where plant isolations are required for inspections or minor non-intrusive work and potentially pose safety risks if team members are constrained to 15 minutes to prepare plant for service.

TGen believes that an allowance of at least 30 minutes recall is an appropriate timeframe to carry out the task in a safe manner.

If you have any queries or require any clarification, please do not hesitate to contact Daniel Hill on 0436809994 or by email: daniel.hill@territorygeneration.com.au.

Yours sincerely



John Greenwood
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24 August 2020