MANUAL LOAD SHEDDING STANDARD

DRAFT REPORT AND DETERMINATION

Published: **December 2019**

Australian Energy Market Operator Ltd ABN 94 072 010 327 www.aemo.com.au info@aemo.com.au

NEW SOUTH WALES QUEENSLAND SOUTH AUSTRALIA VICTORIA AUSTRALIAN CAPITAL TERRITORY TASMANIA WESTERN AUSTRALIA

NOTICE OF SECOND STAGE CONSULTATION – MANUAL LOAD SHEDDING STANDARD

Date of Notice: 6 Dec 2019

This notice informs all Registered Participants and interested parties (Consulted Persons) that AEMO is commencing the second stage of its consultation on the Manual Load Shedding Standard.

Invitation to make Submissions

AEMO invites written submissions on this Draft Report and Determination (Draft Report). Please identify any parts of your submission that you wish to remain confidential, and explain why. AEMO may still publish that information if it does not consider it to be confidential, but will consult with you before doing so. Consulted Persons should note that material identified as confidential may be given less weight in the decision-making process than material that is published.

Closing Date and Time

Submissions in response to this Notice of Second Stage of Rules Consultation should be sent by email to darren.spoor@aemo.com.au, to reach AEMO by 5.00pm (Melbourne time) on 13 Dec 2019. All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this consultation to the same email address. Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Publication

All submissions will be published on AEMO's website, other than confidential content

EXECUTIVE SUMMARY

The publication of this Draft Report continues the consultation process conducted by AEMO to consider the publication of a new Manual Load Shedding Standard.

On 1 May 2019, AEMO published a Notice of Consultation and the draft Manual Load Shedding Standard. A joint submission was received on 30 September from Ergon and Energex, which proposed two minor amendments to the document. AEMO considered the submission and met with Ergon and Energex, at which they agreed that changes to the draft Standard were not required. Following that meeting, AEMO considers that no further changes to the draft Manual Load Shedding Standard are necessary. AEMO's draft determination is to accept the Manual Load Shedding Standard in the form published with this Draft Report.

CONTENTS

EXECUTIVE SUMMARY 3

1. STAKEHOLDER CONSULTATION PROCESS 5

2. BACKGROUND 5

2.1. NER requirements 5

2.2. Context for this consultation 5

2.3. Initial consultation 5

2.4. Public consultation 6

3. SUMMARY OF MATERIAL ISSUES 6

4. DISCUSSION OF MATERIAL ISSUES 6

4.1. Manual Load Shedding Standard 6

5. DRAFT DETERMINATION 7

APPENDIX A. GLOSSARY 8

APPENDIX B. SUMMARY OF SUBMISSIONS AND AEMO RESPONSES 9

1. STAKEHOLDER CONSULTATION PROCESS

The matter for consultation involves the publication of a new Manual Load Shedding Standard. This Manual Load Shedding Standard is designated as a power system operating procedure under clause 4.10.1(a)(5) of the National Electricity Rules (NER).

AEMO conducted meetings with transmission network service providers and jurisdictional system security coordinators in March and April 2019. AEMO developed the draft Manual Load Shedding Procedures and published a notice of consultation dated 1 May 2019 under clause 8.9 of the National Electricity Rules, inviting submissions by 30 September 2019. Only one submission, a joint submission from Ergon and Energex, was received. AEMO met with Ergon and Energex on 18 October 2019, at which they agreed that changes to the draft Standard were not required.

The publication of this Draft Report continues this consultation.

2. BACKGROUND

2.1. NER requirements

This draft Manual Load Shedding Standard meets the requirements of clause 4.3.4(e) of the NER:

> *AEMO must develop, and may amend, standards in consultation with Network Service Providers in accordance with the Rules consultation procedures which must be met by Network Service Providers in arranging and maintaining the controls, monitoring and secure communication systems referred to in clause 4.3.4(c).*

2.2. Context for this consultation

Clause 4.3.4(c) of the NER requires Network Service Providers (NSPs) to arrange and maintain controls, monitoring and secure communication systems to facilitate a manually initiated, rotational load shedding and restoration process in accordance with standards set by AEMO under clause 4.3.4(e). NSPs continue to maintain existing control systems and monitoring of secure communication systems to achieve this outcome.

2.3. Initial consultation

AEMO met with each of the NEM TNSPs and JSSC's to request feedback on the final working draft of the Manual Load Shedding Standard. This standard is intended to meet the requirements of clause 4.3.4(e) of the NER and to complement the Jurisdictional Load Shedding Guidelines published by the Jurisdictional System Security Coordinator (JSSC) in each region. It also supports Transmission Network Service Providers (TNSPs) in defining the objectives and content of Load Shedding Plans. These plans are to be developed in consultation with the Distribution Network Service Providers (DNSPs) and applied in real-time at the request of AEMO

AEMO received support from each of the TNSPs and JSSCs. Much of the feedback was structural and grammatical. However, as a result of this consultation, it was agreed that the draft Manual Load Shedding Standard should not specifically list each of the TNSP Manual Load Shedding Plans as this would inhibit the TNSPs' flexibility when changing the name or title of the Plan. The obligation for the TNSP to have a Load Shedding Plan was therefore deemed adequate.

2.4. Public consultation

AEMO issued a Notice of First Public Consultation dated 1 May 2019, which invited submissions on the draft Manual Load Shedding Standard. AEMO received one written submission in the first stage of consultation.

3. SUMMARY OF MATERIAL ISSUES

The key material issues arising from the proposal and raised by NSPs are summarised in the following table:

No.	Issue	Raised by
1.	The term "sensitive loads", as identified in clause 2.1a, should be defined in the Glossary;	Ergon / Energex
2.	Clause 2.4 should be extended to require AEMO to also advise relevant Distribution Network Service Providers (DNSPs) of a manual interruption to load or the restoration of load, due to the potential for load shedding to impact a DNSP's system stability	Ergon / Energex

A detailed summary of issues raised by NSPs in submissions, together with AEMO's responses, is contained in Appendix B.

4. DISCUSSION OF MATERIAL ISSUES

4.1. Manual Load Shedding Standard

4.1.1. Issue summary and submissions

Ergon and Energex submitted a joint response, where they expressed general agreement with the content of the Manual Load Shedding Standard. However, they recommended the consideration of two changes in the document:

- *The term "sensitive loads", as identified in clause 2.1a, should be defined in the Glossary; and*
- *Clause 2.4 should be extended to require AEMO to also advise relevant Distribution Network Service Providers (DNSPs) of a manual interruption to load or the restoration of load, due to the potential for load shedding to impact a DNSP's system stability*.

No other submissions were received from the initial consultation.

4.1.2. AEMO's assessment

In relation to the first matter raised by Ergon & Energex, AEMO notes that the existing Glossary within the draft Manual Load Shedding Standard provides that terms defined in the NER have the same meanings as in the draft Standard. The term "sensitive loads" is already defined in Chapter 10 of the NER, so there is no need to include a definition of the term in the draft Standard.

In relation to the second matter raised by Ergon & Energex, AEMO has Load Shedding Procedures in place for each State. For example, AEMO's Load Shedding Procedure for Queensland (SO OP 4319), states that where there is a need for load shedding or load restoration in Queensland, AEMO must direct Powerlink and Powerlink must then coordinate load shedding or load restoration with the DNSPs in Queensland.

There are similar provisions in the load shedding procedures for other regions in the National Electricity Market. This means that there is already a mechanism for communication with DNSPs regarding load shedding and load restoration and the appropriate entity to communicate with DNSPs regarding load shedding is the relevant TNSP for the region. AEMO considers that clause 2.4 should not be amended to require AEMO to advise DNSPs of a load interruption or restoration. Ergon and Energex agreed to this position during the meeting on the 18 Oct 2019.

4.1.3. AEMO's conclusion

AEMO will maintain the draft Manual Load Shedding Standard in its present form. A second round of public consultations will be for a shorter period as there are no outstanding requests to modify the content of the draft Manual Load Shedding Standard.

5. DRAFT DETERMINATION

Having considered the matters raised in submissions, AEMO's draft determination is to make the Manual Load Shedding Standard in the form of Attachment 1, in accordance with clause 4.10.1(a)(5) of the NER.

APPENDIX A. GLOSSARY

Term or acronym	Meaning
DNSP	Distribution Network Service Provider
JSSC	Jurisdictional System Security Coordinator
NER	National Electricity Rules
NSP	Network Service Provider
QLD	Queensland
TNSP	Transmission Network Service Provider

APPENDIX B. SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

No.	Consulted person	Issue	AEMO response
1.	Ergon / Energex	The term "sensitive loads", as identified in clause 2.1a, should be defined in the Glossary;	As the Glossary within the Manual Load Shedding Standard incorporates definitions in the National Electricity Law or the NER, and the term "sensitive loads" is defined in Chapter 10 of the NER, it is not necessary to include a further definition of the term.
2.	Ergon / Energex	Clause 2.4 should be extended to require AEMO to also advise relevant Distribution Network Service Providers (DNSPs) of a manual interruption to load or the restoration of load, due to the potential for load shedding to impact a DNSP's system stability	AEMO's Load Shedding Procedures for each State require TNSPs to coordinate load shedding with DNSPs in QLD, so there is already a mechanism for communication with DNSPs.