3.1.4 Is the current ICCP Protocol specified in the current Standard still appropriate?
Yes it is, however, it would be beneficial for AEMO to provide definitive guidelines for the implementation of ICCP / secure ICCP.

3.1.5 What additional detail is required in the Standard to provide more clarity on boundary of both operational and financial responsibilities?
It should be clear what is the responsibility of the generator, and what is the responsibility of the TNSP. Many new generators are unclear on what it is they need to do to connect to AEMO, and the TNSP is the one that ends up guiding them through the process as they connect to AEMO via the TNSP.

3.1.6 Should the Standard include a specific requirement that data sent should be of good quality? If so, what would be implications for stakeholders?
Who is accountable for ensuring the data quality? The generator or the TNSP that passes it to AEMO? Furthermore, when the quality is not acceptable, who is accountable for resolution?
My experience has been that when issues arise AEMO will contact Powerlink about an issue, which is 9 times out of 10 not a Powerlink issue, but a generator issue and that Powerlink ends up needing to troubleshoot with the generator. I can see this going the same way, which would cost Powerlink money to support.

3.1.10 Does the legislation adequately cover security obligations and requirements or is there a need for more detailed obligations in the Standard?
Whilst the legislation is currently broad and principles based, it is the minimum standard that we must adhere to and it is clear what it requires of organisations. If AEMO want to take it further, then that is up to AEMO, but there may be cost implications of doing more than what is legislatively required.

3.1.11 What changes would be required to clarify reliability requirements in the Standard?
None. It is up to the entity to meet the requirements, not for AEMO to mandate how the entity runs its business.

3.1.11 Does the Standard need to set enhanced expectations regarding monitoring and reporting of availability and why? What would be reasonable expectations to set? What changes would be required to data communications systems to achieve enhanced monitoring and reporting of availability?
No.

3.1.11 Does any lack of redundancy currently restrict the ability of participants to apply software security patches in a timely manner?
No, it's up to the entity to architect their systems to factor this in. If they haven't, then they need to redesign their system to be able to perform this function.

3.1.13 What issues have arisen that would justify including in the Standard a specific requirement regarding response time to forced outages? If so, what would reasonable expectations be?
There are too many types of issues that can occur, and setting a timeframe would be arbitrary. At best it should simply state that the service should be returned to service as soon as possible.

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