Iberdrola Australia submission for 2024 CIR guideline review

(Extracted from email sent to Ben Blake on 22/01.25)

- The topography of the NEM's power system is changing rapidly, with new congestion scenarios emerging under outage and system normal conditions. A publication of network diagrams/SLDs which is aligned with AEMO's constraints would be an invaluable resource for participants in interpreting and understanding congestion events and constraints. We would suggest that these diagrams be updated and shared for currency, then reviewed on at least a biannual basis. We imagine provision of this resource would require TNSP coordination and support.
- In the last twelve months, units under our operation have been placed under new limits which do not relate to active power signals (e.g. Number of turbines allowed to generate, number of inverters allowed to generate). In our view it is not appropriate or effective for these requirements to be enforced and assessed via AEMO constraint. We request that all emerging limits not relating to active power (MW) be agreed upon through consultation with AEMO and the impacted participants with a notification period of at least one month to ensure processes can be developed by participants to comply with these requirements. If these requirements are to be managed through constraints, AEMO should provide direct and specific communication to the impacted participant when such a constraint changes, or is added to a constraint set.
- While acknowledging that NRM processes are being reviewed as part of the reform around PEC Market Integration, the enaction of these constraints has a significant impact on market outcomes. The documentation we have been able to access doesn't fully describe the NRM process and calculation (particularly post 5-minute settlement). We request AEMO review the NRM documentation which outlines the calculation of negative residue accumulation. We also seek clarity on the reflection of NRM constraints in 5PD interconnector flows and resulting 5PD price forecasts, as we see a large variance between 5PD and outcomes in dispatch.
- We request AEMO review the timeliness and consistency with which significant planned and unplanned network changes as reflected in constraint invocation/withdrawal are reflected within AEMO's Market Notices. We acknowledge the operational overhead here, so suggest such a notification can be automated, as there's often a delay between seeing significant constraints impacting dispatch outcomes before a Market Notice describing the event is published. Additionally, we suggest AEMO include 'Constraint Set ID' as an included databased field with published Market Notices, improving searchability of Market Notices/Constraints.
- Constraints and their outcomes have a significant impact on market outcomes, and as such we recommend and request greater transparency in constraint formulation, change, and invocation. Our requests in this space include:
    - Can Limits Advice documentation leading to constraint change/introduction be made available to participants?
    - When constraints are invoked, can a brief 'Reason' be provided/published alongside each invocation?
    - Improving auditability of the 'GENCONSETINVOKE' table - currently 'old' records are erased if the start or end time of an outage is adjusted (historical start/end times are lost). Could historical records be retained?
    - Requesting a closer alignment between the Network Outage Schedule (NOS) file and the 'GENCONSETINVOKE'/'NETWORK'. At times there can be disagreements

between these resources. The 'recommended constraint set' given in NOS does not reflect within the MMS database, too.