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Ms Taryn Maroney
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Dear Taryn

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TransGrid submission: AEMO System Restart Ancillary Services – Draft Report Consultation

TransGrid appreciates the opportunity to provide comments on the Australian Energy Market Operator's (AEMO) SRAS (May 2013) Draft Report. The focus of the submission is to ask AEMO to thoroughly consider a number of technical concerns in relation to its recommendations # 3 and # 4.

Recommendation 3

AEMO recommends that the number of electrical sub-networks be re-determined and one SRAS be procured in each electrical sub-network, except for Tasmania where two SRAS should be procured. The following electrical sub-networks should be combined into one electrical sub-network:

- *North and Central Queensland*
- *North and West Victoria and La Trobe Valley*
- *North and South Tasmania.*

At the completion of the SRAS Review, AEMO will progress these recommendations by consulting with stakeholders on the Boundaries of Electrical Sub-networks and the SRAS Quantity Guidelines.

TransGrid is asking whether or not AEMO has undertaken detailed studies to ensure that the existing System Restart Standard can be satisfied if only one SRAS be procured in each electrical sub-network (in addition to the supply from the adjoining region)? In particular, will Queensland be able to supply a number of thermal power stations in the NSW northern electrical sub-network in order to satisfy the system restart standard (if there is only one SRAS option is available locally)?

Further, to what extent has AEMO taken into account the time required to restore adequate load along the restoration path to manage high voltage issues when restoring long distance transmission lines?

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AEMO recommends the definition of primary and secondary restart service be replaced by a definition of SRAS reflecting the following requirements:

“the capability to restart generating units without external supply from the national grid, re-energise the local busbar and supply at least 100MW of capacity within 60 minutes.”

This would replace the definitions of primary and secondary restart service in the SRS and the NER. AEMO also recommends SRAS meets a minimum 90% reliability level in the SRS. These changes would require amendment to the SRS, and corresponding changes to the SRAS Description and SRAS Assessment Guidelines.

TransGrid considers that the proposed condition that an SRAS option capability should supply at least 100MW of capacity within 60 minutes will rule out most of the SRAS currently available in the National Electricity Market. This could result in even less competition than presently exists. It should be noted that the ability to supply at least 100MW of capacity will not necessarily contribute to the restoration of other supply facilities as AEMO have mentioned in the draft report to justify this recommendation.

The MVAR capability of the SRAS (in order to be able to restore unloaded transmission lines to other generation supply facilities) as well as the ability of the SRAS to energise large transformers in the transmission network (that is, ability to supply the large transformer inrush currents) will play a significant role in restoring a number of supply facilities from a single restart source.

In addition, extending the transmission network to a number of supply facilities from a single large SRAS could incur additional risks during the restoration stage.

Should you require any further clarification on these matters, please feel free to contact, Dr Jahan Peiris, Manager-Operations Technical Support on (02) 9620 0884, or by e-mail: Jahan.Peiris@transgrid.com.au in the first instance.

Yours sincerely

[Original letter signed]

Norman Jip
Market Regulation Manager