

Code amendment omnibus two: December 2023 (1411354) 37

A user friendly word document was not provided for submission, the following questions were cut n pasted from the pdf Appendix for a quick and brief submission from me – [REDACTED].

Clarify use and availability of discretionary demand control

Questions

Comments

Q2.1. Do you support the Authority's proposal to permanently implement the intent of the urgent Code amendment, Electricity Industry Participation Code Amendment (Discretionary Demand Control) 2023? Please explain your answer.

Its critical to take all steps to avoid power outages.
It seems a necessary step in that direction.
There is no certainty urgent issues will go away, to the contrary.

Q2.2. Do you support adopting the term controllable load? Please explain your answer.

Yes. It is a more accurate description of the subject matter.
Discretion implies discretion, there is a degree of circumstantial compulsion relevant which is therefore not discretionary!

Q2.3. Do you support the use of the term 'resources' over 'quantity of demand'? Please explain your answer.

Probably the most critical thing is the quantities are well defined in measurement terms.
The terms "generation", "load" and "controllable load" seem fundamental summary terms difficult to better.

Q2.4. Do you support the proposal to introduce two price-bands? Please explain your answer

The information provided is in summary form, and does not include a worked example to specifically exemplify the envisioned working.
To me responses must include information which includes a direct measure of power.
Also auditability and transparency of the information is relevant for example it should be obviously interpretable that a region of controllable load has not been missed in the calculation.

If I understand correctly the intention is to ask how much load is available to be shed should we need to do so, and then secondly to directly request the shedding of the load.
The first is an information request and the second is an instruction.

It would be important to ensure there is no disparities arising from requested load available to shed, and instructed load shedding when some load available to shed is shed then raising the question of how much load remains to be shed on instruction?

Expressed differently it may be important to say no indicated load under WRN is shed and kept available for any GEN, but depending on timing this might change, e.g. around the time of 1 pm when CR10 load might be automatically turned on, or Street lights are turned on are “2nd level” risk times given longer periods of grid shortage issues (which would not be a good look if those events triggered grid failure). (While not a time of concern to the grid to date does not exclude the possibility.) A switch or flag or signal to stop automatic set events to be suspended may be required if not implemented now

Modelling scenarios may be a good idea. A forward looking snapshot of set and expected load control changes might be relevant, as may a time period of validity for the WRN estimate.

Q2.5. Do you support pricing requested controllable load at \$0.01/MWh? Please explain your answer

No response. (Not funded to analyse further)

Q2.6. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority’s statutory objective in section 15 of the Electricity Industry Act 2010

As mentioned herein.

Q2.7. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?

No response.

Q2.8. Do you have any comments on the drafting of the proposed amendment?

Yes, as follows.

Information About Design Intentions with Controllable Loads

It is critical the amount of controllable load is transparent, available, reliable, up to date, auditable, and timely. That is it is in effect a defacto for generation as such the comparable characteristics should be available.

How quickly can it be turned off, what are the details of its implementation, is it available over a cycle, a second, or staggered over what time period?

How is the load reconnected, all at once, or staggered over what period?

Reduce Ambiguity / Promote Clarity

Regarding the definitions:

instructed controllable load means the quantity of resources (in MW) that a connected asset owner estimates will be available for use by the system operator when required under a grid emergency.

...

requested controllable load means the quantity of resources (in MW) that a connected asset owner estimates will be available for use by the system operator when requested under a formal notice

To make things clearer (for examples) the reference name / term should include more direct words to make it easier to understand the context of each phrase:

instructed controllable load may be better named as (instructed?) “emergency controllable load”

requested controllable load would be better named as “requested controllable load notice” or perhaps “discretionary controllable load” or even “available controllable load” (and any valid period or expiry time?)

Are the distinctions between the two sufficiently clear and readily available to comprehend by interested people?

Finally what checks are there to ensure the load is available with provision for brief test runs to confirm available controllable load measured is the same as the indicated amounts.

Unfunded submission from a power consumer.

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9-2-2024