Consultation update

Meeting between the Network Operator and the System Controller in regards to the System Control Technical Code – Incident Reporting consultation.

Power and Water Corporation holds the Network Operator license and the System Control license and is subject to ring fencing arrangements. Representatives from these two ring fenced businesses within Power and Water Corporation met on 7 July 2021 to discuss the proposed changes to Incident Reporting in the System Control Technical Code[1]. The discussion broached a number of suggestions by the Network Operator and the System Controller encouraged these suggestions to be provided by a submission to the consultation. The discussion is summarised below for the benefit of all stakeholders:

1. **Minor Reportable Incident Thresholds:**
   The Network Operator advised that 50,000 customer minutes may be quite low. The Network Operator also advised that this could be an unnecessary duplication of the detailed reporting already undertaken by the Network Operator and provided to the Utilities Commission as part of the Power System Review. It was also noted that Minor Incident Reporting is predominantly a network reliability assessment and not typically done by other System Operators.

   The Network Operator shared there may be benefit in reducing the reporting to key reliability events (e.g. 10-20 events per year) to investigate statistical outliers more thoroughly or remove minor incident reporting from the System Control Technical Code in its entirety.

2. **Application of Major Reportable Incident to Alice Springs and Tennant Creek:**
   The Network Operator commented on the number of repeat security events in Alice Springs and Tennant Creek, which due to the characteristics of the system were more akin to a reliability impact. It was considered that this review of the System Control Technical Code may be the suitable opportunity to consider abridged reporting for some events within those systems.

   The System Controller noted that the reporting relates to the obligations in the System Control Technical Code to maintain system security and these systems have consistent definitions for system security. The System Controller considered that reduced or abridged reporting would not be consistent with the objectives of identifying deficiencies within Alice Springs or Tennant Creek against their performance with the security related obligations within the code, but there may be benefit in further consideration of bespoke security arrangements for those systems with commensurate reporting.

3. **The timelines for reports on Alice Springs and Tennant Creek systems:**
   The Network Operator identified that initial investigations often requires the dispatch of staff from the Darwin – Katherine region to Alice Springs or Tennant Creek to investigate. As

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[1] For the remainder of this document, references to System Controller and Network Operator refer to the representatives within Power and Water Corporation for the respective license rather than the license itself.

a consequence the 5 day timeline for initial investigation has impacts to the network operator and would frequently result in deferral of other planned works or otherwise require the administrative process to request an extension to the timeline. It was suggested that the guidelines could include other timelines for the Alice Springs or Tennant Creek power systems.

4. **Context of the Incident Reporting Guidelines in the consultation:**
   The context of the Incident Reporting Guidelines was queried with regards to the consultation. The System Controller clarified that the guidelines were provided for context and feedback was welcome, but that these were not part of the formal consultation. Further opportunity to consult on the Guidelines would occur after the Utilities Commission makes a determination on the proposed changes to the System Control Technical Code.

5. **Refinement of recommendations and actions:**
   The Network Operator identified that there would be benefit in further classification of actions or recommendations produced from Major Incidents. It was suggested that key operational recommendations should be tracked and resolved, but that outcomes relating to a longer term improvement if not directly related resolving a future event, compliance obligation or risk to system security might benefit from a different process.