System Control Technical Code Power System Incident Reporting

Submission to the Utilities Commission to amend the System Control Technical Code

PowerWater

1 Introduction

Section 7 of the System Control Technical Code (**SCTC**) currently prescribes obligations on the System Controller and System Participants in regards to reporting and investigation of power system incidents. Power and Water Corporation in its capacity as the System Controller (**System Controller**) has reviewed these provisions and identified that they are not fit for purpose and should be amended to reflect good electricity industry practice.

In accordance with clause 1.8.2 of the SCTC, the System Controller has consulted with industry and is now submitting this paper, together with attachments, to seek the approval of Utilities Commission to amend the SCTC.

This submission outlines the feedback received from industry consultation and how the System Controller has considered this feedback when revising the proposed amendments to the SCTC. It is accompanied by the following attachments:

- The consultation paper provided to industry on 14 May 2021 outlining the initial proposed amendments to the SCTC.

- The proposed amendments to the SCTC in the following forms:
    - Without tracked changes;
    - With changes tracked against the SCTC in force today (Version 6.0); and,
    - With changes tracked against the version provided to industry for consultation on 14 May 2021.

- The draft Incident Reporting Guideline:
    - Without tracked changes; and
    - With changes tracked against the version provided to industry for consultation on 14 May 2021.

The System Controller notes that the proposed amendments to the SCTC would not require the Incident Reporting Guideline (**Guideline**) to be approved by the Utilities Commission, but would require industry consultation. It is provided for context, noting that if the SCTC amendments are approved by the Commission as drafted, the Guidelines would be consulted on with industry thereafter in accordance with the process outlined in the proposed amendments.

Consultation overview

The SCTC section 7 Power System Incident Reporting amendments were drafted and a consultation paper (the **paper**) was prepared to assist in facilitating consultation with interested industry stakeholders. The paper describes the issues with the current SCTC provisions, the scope of amendments being proposed as well as some key consultation questions. To further assist stakeholders in understanding the proposed changes, a draft of the Guidelines was created. The Guidelines were developed to reflect the proposed new power system incident reporting arrangements.

The System Controller published the proposed amendments to SCTC section 7 on 14 May 2021. Consultation was held over a six-week period, with submissions due by Tuesday 29 June 2021. To assist stakeholders, the System Controller extended the submission deadline to 13 July 2021.

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A meeting with the System Controller and the Network Operator of Power and Water Corporation was held on 7 July 2021 to discuss the proposed changes to the Power System Incident reporting process in the SCTC. A summary of the discussion was published on 9 July 2021. Power Services provided a late submission on 19 August which was accepted.

Submissions addressing the SCTC Power System Incident reporting process were received from:

- EDL – A second submission was received from EDL post the publication of the System Controller and Network Operator discussion;

- Territory Generation; and

- Power and Water Corporation – Power Services (as the Network Operator).

The System Controller acknowledges and appreciates the effort of stakeholders in making submissions on the draft Guidelines.

The System Controller has reviewed each issue raised carefully, amended the SCTC where appropriate, and has provided a response to each issue. We have attempted to group like issues raised by stakeholders into themes and respond accordingly wherever possible. A table is included at the end of this document that provides a more detailed cross reference between each theme and specific stakeholder submissions.

Summary of proposed changes

The proposed SCTC amendments relate to:

- Removal of Minor Reportable Incidents;

- Changes to reporting obligations on System Participants including the System Controller;

- Introduction of obligations surrounding recommendations made in incident reports;

- Negotiation and review processes to agree on actions associated with recommendations made in incident reports;

- Changes to the scope of the Power System Incident Reporting Guidelines;

- Restructuring of the reporting functions within the Code to a logical (predominantly chronological) sequence; and,

- Consequential changes to Section 8.4 (Power System Controller Reports) of the SCTC.

This Paper only discusses the key areas of the proposed amendments to the SCTC as they relate to issues raised in industry consultation and how the proposed amendments were varied in response to the feedback. For discussion on the non-contentious aspects of the proposed amendments to the SCTC, please view the attached consultation paper provided to industry on 14 May 2021.

2 Key issues raised in submissions

We believe that the issues raised by stakeholders can be grouped into the following key themes:

1. Minor Reportable Incidents

2. Reporting Timeframes

3. Final Report Recommendations

4. Efficient Closing of Actions

5. Power System Incident Reporting Guideline

In the following sections we explore the concerns raised in relation to each theme. We discuss the concerns raised, their relevance to the SCTC and identify any revisions to the SCTC that we believe are warranted. All other feedback received from stakeholders through their submissions has been addressed in the detailed responses to submissions provided in Section 3.

2.1 Minor Reportable Incidents

Feedback received

A number of submissions supported the change in minor incident reporting thresholds. The Network Operator commented that the current reporting of minor incidents duplicates the function of other technical regulation instruments they are responsible for complying with, such as the Utilities Commission Electricity Industry Performance Code and the Australian Energy Regulator Annual Regulatory Information Notices.

It was also noted during the System Controller and Network Operator meeting that Minor Incident Reporting is predominantly a network reliability assessment and not typically done by other System Controllers. NER clause 4.8.15, review of operating incidents, does not contain any equivalent customer reliability thresholds.

Response to feedback

The System Controller notes that the Network Operator is responsible for regulatory reporting of network reliability and that the network reliability reporting is not completed by other network operators. Therefore the System Controller proposes to remove minor incident reporting classification from the SCTC. By removing minor reportable incident classification System Participants and the System Controller will no longer report on customer reliability events stemming from distribution network outages and reporting will be focused on power system incidents that have or could reasonably be expected to have an adverse effect on power system security or the reliability of the power system.

The System Controller proposes that the SCTC is amended to remove the minor incident classification and reliability based references that were applicable to the minor reportable incident category. Accordingly, the major reportable incident classification and the reportable incident classification process should be streamlined such that a power system incident is tested against a set of criteria and determined if the power system incident is a reportable incident. The level of information and reporting requirements will be assessed by the System Controller and be provided as part of the reportable incident notification process.

2.2 Reporting Timeframes

Feedback received

Stakeholders supported the reporting timelines for System Participants providing reports to the System Controller for the Darwin-Katherine power system as being practical. Concerns were raised with respect to meeting the proposed reporting time frames for the isolated power system of Tennant Creek and stakeholders were supportive of reporting timeframes that are appropriate to the different power systems.

Response to feedback

The System Controller understands there may be logistical challenges with meeting timeframes for the remote power systems but delayed investigations of extremely high risk events, such as a system black, may result in recurrence of an otherwise preventable power system incident. The

timeline of 5 days for a brief report is expected to contain high level details of the power system incident so that the System Controller can assess the power system incident and determine additional reporting requirements. The reporting requirements for a brief report set out in the Guidelines should not be onerous.

When required, a System Participant will have 20 business days to complete any necessary investigations and submit a Final Report. Where additional time is required to complete an investigation and report the System Participant can request a time frame extension. The proposed Guidelines detail the process for time extensions for both brief and final reports.

2.3 Final Report Recommendations

Feedback received

Stakeholder responses supported the introduction of a review of draft recommendations and the process of agreeing to actions prior to publication of the Final Report. The review period will allow System Participants to negotiate with the System Controller on the actions required to complete the recommendations and an opportunity clarify or resolve any issues with the actions. If an agreement cannot be reached on the actions within 15 business days the decision may be escalated to the Utilities Commission.

The response from the Network Operator included a proposal for classifying recommendations to improve recommendations and action tracking. The following three categories were proposed;

1. Long term strategic improvements – recommendations that will require long term planning, significant investment or regulatory process to be followed for implementation.
2. Routine findings/defects – recommendations identified through the investigation that did not directly contribute to a reportable incident.
3. Immediate operational security measures – recommendations that will directly contribute to the reduced probability or consequence of a reportable incident.

The proposal recommended that long term strategic improvement recommendations should be addressed through a broader power system review or through the integrated power system planning mechanisms. These types of recommendations are associated with structural or inherent design issues within the NT power systems which require significant studies, options analysis or investment decisions. Implementation can trigger regulatory processes that could reasonably take several years to complete and therefore setting specific and tracked timeframes is not practical.

Response to feedback

The System Controller is of the view that all actions that are required for preventing a reportable incident or are materially required for power system security must be tracked. Tracking of actions is critical to the investigation and report close out process to ensure the actions effectively address the cause of a reportable incident.

The System Controller considers that actions that have a long lead time for completion, due to necessary planning, investment or regulatory process, must still have obligations and timeframes for completion. During the process for agreeing on actions between the System Participant and the System Controller, the System Participant should consider a reasonable timeframe for implementing actions and scope the actions in appropriately small steps to ensure the appropriate planning is undertaken before committing to longer term actions.

2.4 Efficient Closing of Actions

Feedback received

Stakeholder feedback raised the issue with the existing SCTC for closing out of recommendations that overlap with other System Participants. Specifically where a System Participant has completed the necessary action for their responsibility of a jointly owned recommendation they cannot submit evidence or close the action as the recommendation has actions that have not been completed by the other System Participant.

Response to feedback

The System Controller notes that the issue of delayed closure of actions has frequently been due to the need to ensure that the outcome of the overarching recommendation is achieved adequately. To resolve this, the System Controller has proposed an amendment to the SCTC to include a post review of recommendations and close out of all related actions.

For shared recommendations the post close review would allow a System Participant's actions to be closed out upon completion and submission of appropriate evidence. When all actions for a recommendation have been completed by System Participants the outcome would be reviewed by the System Controller to determine if the recommendations outcomes have been achieved. If an outcome is not achieved, negotiation of further actions should be considered.

2.5 Incident reporting Guideline

Feedback received

Stakeholders raised concern that the Guidelines are a subordinate document to the SCTC and that changes to the Guidelines should require a public consultation process with System Participants and be approved by the Utilities Commission.

Response to feedback

The proposed SCTC clause 7.5.1(c), details the System Controller obligation to consult with System Participants and the Utilities Commission in developing and amending the Guidelines. The addition of an approval process by the Utilities Commission would make the Guidelines equivalent to the SCTC and undermine the intent of the Guidelines. The Guidelines are drafted to support the System Controller's and System Participant's obligations with respect to the power system incident reporting process.

The scope of the Guidelines is prescribed within the SCTC and future amendments are required to fit within this scope. Any proposal to introduce new obligations to the power system incident reporting process would first require the scope of the SCTC to be amended via a public consultation process and with the approval of the Utilities Commission.

The draft Power System Incident Reporting Guidelines were published along with the consultation papers to provide context for the SCTC changes. Guideline feedback was welcomed from stakeholders however the Guidelines will be finalised following the SCTC changes being approved by the Utilities Commission. Stakeholder responses requested further consultation on the Guidelines and provided the following suggested refinements:

- Request for notification and reporting templates be included within the Guidelines;

- Clarification that a System Participant is responsible to report on items within their area of responsibility only;

- Wording/editorial recommendations;

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- Guideline clarification and distinction between firm recommendations and other recommendations that are observations or opportunities for improvement;

- Supporting changes to the reportable incident classification process in line with the proposed removal of Minor Reportable Incident reporting;

- Repeated recommendations should be identified within the Final Report and reference the original recommendation and power system incident; and

- Inclusion of a timeframe for the System Controller to close out actions.

The stakeholder recommendations have been considered and where appropriate have been incorporated in a new revision of the Guidelines. Further changes may be made to the Guidelines prior to final consultation in order to accommodate any variations to the SCTC made by the Utilities Commission in its determination.

3 Detailed Responses to Submissions Received

Please note that the words used in the Issue/Comment column in the table below are in general our summarised interpretation of the issues raised by stakeholders and are not a verbatim quote from individual submissions. The submissions are available on our website. The Reference Number (Ref#) in the table is an internal tracking number to ensure all issues have been addressed. The comments made by stakeholders have, where possible, been grouped into themes so that similar issues can be addressed together. Where our response has recommended a change in the draft Guidelines, this has been noted in the response.

Theme	Stakeholder	Issue/Comment	System Controller Response
Consultation Question 1: Is the move to customer minutes an appropriate metric for incident reporting threshold?	EDL #1	Query the use of customer minutes vs other metrics, such as SAID for the different systems. Other metrics, such as SAIDI, are effectively normalised based on the number of customers in the system	No longer applicable with revised approach as per Section "2.1 Minor Reportable Incidents". However, we note that the approach was taken originally as distribution feeder sizes are roughly comparable across the three regulated systems, hence outage sizes are typically comparable and do not scale per system.
Consultation Question 1: Is the move to customer minutes an appropriate metric for incident reporting threshold?	Territory Generation	Territory Generation considers this is an appropriate measure as per its comment general observations and suggestions Outage restoration for larger outages should be feeder by feeder.	No longer applicable with revised approach as per Section "2.1 Minor Reportable Incidents". Already the practice that incidents encompassing multiple feeder outages, recognise the feeder by feeder restoration.
Consultation Question 1: Is the move to customer minutes an appropriate metric for incident reporting threshold?	EDL #2	Submitted post Network Operator and System Controller discussion: Supportive of setting appropriate thresholds with a mechanism for periodic review. Supportive of the Network Operator suggestion of focus on key reliability events.	Based on response from Network Operator and their responsibility to report of network customer reliability events the System Controller has opted to remove the Minor Reportable Incident classification. Response detailed in Section "2.1 Minor Reportable Incidents".
Consultation Question 1: Is the move to customer minutes an appropriate	Power Water - Power Services	Minor events are network reliability related and do not impact power system security. Reporting on minor	Response detailed in Section "2.1 Minor Reportable Incidents". Proposed SCTC changes focus on reportable incidents

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metric for incident reporting threshold?		events duplicates the function of other technical regulation instruments such as the Utilities Commission (UC) Electricity Industry Performance Code (EIP Code) and the Australian Energy Regulator (AER) Annual Regulatory Information Notices (RIN). Power Services have proposed an alternative approach that will reduce the reporting burden for distribution network reliability events, but enables the System Controller to still investigate events that are statistical outliers that could be considered as having an impact on overall power system reliability.	adversely affecting power system security and reliability of the power system and not customer reliability. A review of statistical outliers within the 2019/20 RIN primarily consisted of feeders outages for the Alice Springs system black that was a major reportable incident and accordingly investigated. Additional outages were weather or asset failure interruptions that did not warrant follow up investigation.
Consultation Question 2: Is the approach of prescribing minor incident reporting threshold in the Guidelines reasonable in providing flexibility to adjust as the circumstances require?	EDL #1	EDL agrees that prescribing the threshold in the Guidelines rather than the SCTC provides more flexibility to adjust in a timely manner. However, the appropriate consultation measures must be introduced into the SCTC and the Guidelines to ensure that System Participants' obligations remain regulated.	Consultation process for the Guidelines is detailed in the draft SCTC section 7.5.1 and draft Guideline 5.1.
Consultation Question 2: Is the approach of prescribing minor incident reporting threshold in the Guidelines reasonable in providing flexibility to	EDL #1	EDL queries why the minor and major incident reporting thresholds are based on different metrics. For consistency, customer minutes should be used for both.	Minor incidents are reliability based incidents that directly impact customers. Major incidents have an impact on power system security and may not necessarily result in the loss of supply to customers.

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adjust as the circumstances require?			
Consultation Question 2: Is the approach of prescribing minor incident reporting threshold in the Guidelines reasonable in providing flexibility to adjust as the circumstances require?	Territory Generation	Territory Generation considers this is an appropriate measure	Noted.
Consultation Question 2: Is the approach of prescribing minor incident reporting threshold in the Guidelines reasonable in providing flexibility to adjust as the circumstances require?	EDL #2	Submitted post Network Operator and System Controller discussion: Note the Network Operators comments on repeat power security events in southern power system as a reliability issue. And as per first response are supportive of a centralised Reliability Manager, ideally an Independent Market Operator, to procure the necessary capacity and services to address power system security and reliability concerns in each individual power system.	Noted.
Consultation Question 2: Is the approach of prescribing minor incident reporting threshold in the Guidelines reasonable in providing flexibility to adjust as the circumstances require?	Power Water - Power Services	Power Services supports the development of a guideline that enables more considered approach to the creation of recommendations in consultation with System Participants.	Noted.

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Theme	Stakeholder	Issue/Comment	System Controller Response
Consultation Question 3: Are the timelines for System Participants providing reports to the System Controller considered practicable?	EDL #1	Time lines are practical if the following points are addressed *Due to visibility of DKIS system EDL has concerns to comply with the System Participant submitting a notification of a power system incident, Code 7.3.1 a), and believe it is not reasonable. The System Controller is best placed to provide notifications to System Participants as outlined in the Guideline 2.4. *To ensure consistency and clarity for all parties, EDL requests that standard templates are developed for the notifications and reports outlined in the Guidelines *To ensure compliance, details for both notifications and operational communications should be clarified with System Participants before these amendments are ratified and periodically reviewed thereafter.	In reference to the specific points; *The notification of a power system incident by a System Participant provides a mechanism for reporting events that the System Controller may not have visibility of. The requirement is a notification only and the System Controller would review the provided information to determine if the event is a reportable incident. A System Participant is responsible for notifying of an event on plant and equipment that they are responsible for. Nothing prevents a System Participant notifying System Control of an occurrence of a power system incident that involves plant and equipment of another System Participant, 7.3.1 e). *The System Controller will consider the inclusion of templates or at least an example of the required notification and reports within the future consultation of the Guidelines. * The draft Guidelines will detail the notification process and the intent is to publicly consult with System Participants regarding the Guidelines after the SCTC amendments are in place.
Consultation Question 3: Are the timelines for System Participants providing reports to the System Controller considered practicable?	Territory Generation	Timeframes seem to be practicable and recommendations should be equal across all System Participants including System Controller.	Noted.
Consultation Question 3: Are the timelines for System Participants providing reports to the	EDL #2	EDL is supportive of reporting timeframes that are appropriate to the different power systems.	Response detailed in section 2.2.

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System Controller considered practicable?			
Consultation Question 3: Are the timelines for System Participants providing reports to the System Controller considered practicable?	Power Water - Power Services	Power Services supports the development of Guidelines to provide greater clarity on accountabilities and formalise mechanisms to manage timeframes. Power Services would like to highlight the challenges of meeting the proposed timeframes in the isolated system of Tennant Creek, given it is often necessary to mobilise resources from Darwin to complete investigations. Further consultation on the timeframes in the draft Guidelines is also supported to ensure the Guidelines consider the challenges in meeting the proposed timeframes due to the remote nature of many parts of the power system.	Response detailed in section 2.2 and 2.5.
Consultation Question 4: Does the Code amendment and Guidelines adequately capture the obligations for the System Controller and System Participants regarding the agreement and timeframe of actions that are reasonably required to prevent the	EDL #1	EDL requires an obligation for the System Controller to review evidence of completed actions within a set timeframe to ensure reportable incidents are closed out. Additionally that requests for timeframes to be extend cannot be unreasonably be withheld.	Response detailed in section 2.4 and 2.5. Approval of timeframe extension requests cannot be unreasonably withheld, where a System Participant has demonstrated evidence that all reasonable attempts to meet the timeline have been or are to be undertaken.

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repetition of a reportable incident?			
Consultation Question 4: Does the Code amendment and Guidelines adequately capture the obligations for the System Controller and System Participants regarding the agreement and timeframe of actions that are reasonably required to prevent the repetition of a reportable incident?	Territory Generation	In general Territory Generation supports the proposed changes with further suggestions and observations.	Noted, and additional observations and suggestion have been listed as individual items within this table.

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Consultation Question 4: Does the Code amendment and Guidelines adequately capture the obligations for the System Controller and System Participants regarding the agreement and timeframe of actions that are reasonably required to prevent the repetition of a reportable incident?	EDL #2	Submitted post Network Operator and System Controller discussion: EDL understood the Guidelines formed part of the formal consultation. The Guidelines place obligations on the System Participants and should be considered before the Utilities Commission makes a determination on the proposed changes to the SCTC.	Response detailed in section 2.5.
Consultation Question 4: Does the Code amendment and Guidelines adequately capture the obligations for the System Controller and System Participants regarding the agreement and timeframe of actions that are reasonably required to prevent the repetition of a reportable incident?	EDL #2	Submitted post Network Operator and System Controller discussion: EDL considered agreed actions following a major reportable incident that prevent the incident reoccurrence should be resolved promptly. Other actions should not require the same level of tracking and resolution.	Response detailed in section 2.3.

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Theme	Stakeholder	Issue/Comment	System Controller Response
Consultation Question 5: Does the Code amendment adequately scope the content included in the draft Power System Incident Reporting Guideline?	EDL #1	The SCTC amendment is adequately scoped.	Noted.
Consultation Question 5: Does the Code amendment adequately scope the content included in the draft Power System Incident Reporting Guideline?	Territory Generation	In general Territory Generation supports the proposed changes with further suggestions and observations.	Noted, and additional observations and suggestion have been listed as individual items within this table.
Threshold metric	Territory Generation	Incident classification for generator events should be based on number of customers affected similar to those of the Network System Participants. Currently all generator events are classified as major.	The post consultation SCTC amendment remove the classification of minor and major.
Actions/Recommendations	Territory Generation	Repeat recommendations should be identified as a duplicate in the final report and deference the primary recommendation associated with it.	Response detailed in section 2.5.

Theme	Stakeholder	Issue/Comment	System Controller Response
		This would assist in identifying and tracking duplicate actions.	
Actions/Recommendations	Territory Generation	Clarification of shall or must recommendations, compliance with the SCTC, and opportunities for improvement actions should be considered within the Guidelines.	Response detailed in section 2.5. The recommendations process introduces a negotiation and clarification opportunity for System Participants and the System Controller to come to an agreement on the actions required to complete the recommendations.
Actions/Recommendations	Territory Generation	Seeking clarification within the Guidelines on how grandfathered assets, as per NTC clause 12.2, will be treated when recommendations are developed.	This factor will be considered when recommendations are developed by the System Controller and actions negotiated with participants.
Investigation and Reporting	Territory Generation	Clarification that a System Participants should only be required to report on plant and equipment within their area of responsibility within the Guidelines.	Response detailed in section 2.5.
Actions/Recommendations	Territory Generation	There have been some recommendations that either overlap with other System Participants or have components outside their control. If one System Participant has completed their part of the recommendation, currently they can't submit or close the action as the total task is incomplete. The wording or process should allow a participant to close their part of the recommendation.	Response detailed in section 2.5.

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Theme	Stakeholder	Issue/Comment	System Controller Response
Investigation and Reporting	Territory Generation	Territory Generation have noted that the SCTC amendments and Guidelines focus on the first four dispatch principals, Clause 4.3 of the SCTC. The reportable incidents should also include breaches for the 5 and 6 dispatch principals; (5) economic dispatch (for the Tennant Creek power system and the Alice Springs power System; (6) security constrained economic dispatch (for the Darwin-Katherine power system);	Power system incident reporting relates to power system security issues. Economic dispatch principals are part of the I-NTEM market operation. Economic efficiency under the I-NTEM is difficult to ascertain given the virtual nature of the market. Nothing in this SCTC prevents a System Participant that is bearing costs from reporting on these and requesting procedures or rule changes that would improve economic outcomes. Changes to reporting in this way would relate significantly to market operation, and although there may be some merit in doing so, it would be more reasonable to establish appropriate market reporting with the establishment of the NTEM rather than the I-NTEM.
Investigation and Reporting	Territory Generation	Current incident investigations and the Final Report actions and recommendations focuses on events from a plant and equipment perspective. One area that is not always considered is the preplanning and economic impacts on System Participants when an incident occurs. Territory propose SCTC clause 7.2.1 is extended to include these areas.	Economic efficiency under the I-NTEM is difficult to ascertain given the virtual nature of the market. Nothing in this SCTC prevents a System Participant that is bearing costs from reporting on these and requesting procedures or rule changes that would improve economic outcomes. Changes to reporting in this way would relate significantly to market operation, and although there may be some merit in doing so, it would be more reasonable to establish appropriate market reporting with the establishment of the NTEM rather than the I-NTEM.
Investigation and Reporting	Territory Generation	Territory Generation sees benefits in the incident reports being inclusive	Noted. That is currently the case where these relate to System Security.

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		of reports on process and procedure breeches for all System Participants.	
Actions/Recommendations	Territory Generation	Territory Generation suggests that the clause 7.1 (f) includes System Controller to "obligation of System Participants to comply with recommendations contained within those reports".	The System Controller is a System Participant as per the definition in the SCTC glossary.
Investigation and Reporting	Territory Generation	Territory generation suggests that the wording in the last paragraph of SCTC 7.1 includes 'efficiently': "to ensuring that the power system operates reliably, safely, securely and efficiently."	Economic efficiency under the I-NTEM is difficult to ascertain given the virtual nature of the market. Nothing in this SCTC prevents a System Participant that is bearing costs from reporting on these and requesting procedures or rule changes that would improve economic outcomes.

Changes to reporting in this way would relate significantly to market operation, and although there may be some merit in doing so, it would be more reasonable to establish appropriate market reporting with the establishment of the NTEM rather than the I-NTEM. |
| Investigation and Reporting | Territory Generation | Territory Generation suggests that "significant economic impacts on System Participants" Within SCTC clause 7.2.1. This would then take in to account operational and financial impacts of risk mitigation actions for major planned works or unforeseen incidents. | Economic efficiency under the I-NTEM is difficult to ascertain given the virtual nature of the market. Nothing in this SCTC prevents a System Participant that is bearing costs from reporting on these and requesting procedures or rule changes that would improve economic outcomes.

Changes to reporting in this way would relate significantly to market operation, and although there may be some merit in doing so, it would be more reasonable to establish appropriate market reporting |

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Theme	Stakeholder	Issue/Comment	System Controller Response
			with the establishment of the NTEM rather than the I-NTEM.
Consultation	Territory Generation	The Guidelines require more detail regarding consultation. The new Guidelines are a subordinate document to the SCTC and should require the same consultation process with System Participants and approval by the UC. This will avoid PWC unilaterally changing the Guideline without providing System Participants opportunity to comment.	Response detailed in section 2.5.
Reporting Timelines	Territory Generation	System Participants timeframe for notifying of a power system incident, 3 business days, seems to conflict the Guidelines figure 1 of 5 business days to submit a brief report to the System Controller.	Notification by a System Participant and a brief report are different items. Notifications by a System Participant will be assessed by the System Controller. If the power system incident is classified as a reportable incident the System Controller will issue a notification to all relevant System Participants. The Guidelines figure 1 time line for reporting starts at the receipt of a notification from the System Controller.
Reporting Timelines	Territory Generation	System Participants timeframe for providing a brief report for a reportable power system incident, 5 business days, seems to conflict with the Guidelines figure 1 of 10 business days for the System Controller to submit a brief report to the Utilities Commission.	System Controller timeframe of 10 business days to submit a brief report to the Utilities Commission starts from the issue of the notification to System Participants. The 5 business days for a System Participant is to allow the System Controller sufficient time to compile the System Participants reports and develop the report for the Utilities Commission.

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Investigation and Reporting	Territory Generation	Guidelines section 2.5 would benefit from the link/reference to the notes in section 2.6.	Response detailed in section 2.5.
Wording	Territory Generation	Various reference errors within the Guidelines "Error! Reference source not found" (format issue).	Response detailed in section 2.5.
Reporting Timelines	Territory Generation	Guidelines section 2.9 5. The closed status would benefit from a timeline to review and close or reject.	Response detailed in section 2.5.
Reporting Timelines	Territory Generation	Extensions of reporting timeframes addresses the process if the extension is rejected. Can an example be provided of other methods.	Extensions must be approved as per the processes in the Guidelines, if rejected the reason for rejection may be due to insufficient information and request further details. If an extension is not granted and the timeframe is not met, this would be handled as a non-compliance as per section 4 of the Guidelines.
Threshold metric	Power Water - Power Services	The historical frequency of events in the Tennant Creek system has created a significant reporting burden on Power Services. The majority of these events are repetitive in nature due to underlying instability in such a small network. A tailored reporting approach for the unique circumstances in Tennant Creek could improve the efficiency of services, while still providing transparency on actions undertaken to improve the reliability of supply and the network.	Time frame component of reporting is detailed in section 2.2. The approach for power system reporting is the same for each NT regulated power systems. The System Controller does not propose to make specific guidelines for each power system.
Minor Incident Reporting	Power Water - Power Services	Power Services view is that minor event reporting in its current form provides little or no value in consideration of other existing	Response detailed in section 2.1.

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		regulatory instruments. Power Services acknowledges that the UC or other System Participants may see value in the reporting, but this may be due to them being unaware of other information that is available through existing reporting. As part of the definition of Major Events, the System Operator has the ability to declare significant events a major event. Power Services would propose that significant network reliability events that do not meet the technical definition of a major event and that the proposed guidelines define the triggers for these types of events. This could align in a similar way to Major Events and Major Event Days in the AER's Reliability STIPS scheme, where a statistical method is applied to identify outlier events for performance measures.	
Incident Classification	Power Water - Power Services	The triggers for major events are wide ranging and can be open to interpretation. Power Services supports the implementation of guidelines to provide greater clarity on how these triggers will be applied in practice. The opportunity to engage further on the development of guidelines is also supported.	Response detailed in section 2.2., 2.3 and 2.5. Reoccurring incidents should be investigated. If through the brief reporting process the System Controller assess the reportable incident as a duplicate of another event then investigations should consider the outcomes of the previous recommendations and if further action is required. A simplified reporting process has been included in the Guidelines following a brief report where

Theme	Stakeholder	Issue/Comment	System Controller Response
		Power Services believes there are opportunities for more efficient reporting and/or action management related to repetitive events that relate to inherent design issues or for small power systems such as Tennant Creek. Ongoing improvements in technology and control systems are changing the operation of the smaller power systems of Tennant Creek and Alice Springs, and these changes may also address specific issues that drive repetitive reporting of events that meet technical triggers, but have limited customer impacts. In the current context, there is repetitive reporting related to specific known issues with long term solutions.	it is identified that an incident does not require further investigation.
Actions/Recommendations	Power Water - Power Services	Power Services supports a defined and consultative process for development of actions that is underpinned by direct engagement with participants. To support the improvement to recommendation and action management, Power Services proposes that the guidelines provide the ability to appropriately categorise actions for the purposes of reporting and enabling greater	Response detailed in section 2.3.

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Theme	Stakeholder	Issue/Comment	System Controller Response
		focus on the actions that have the most immediate benefit to avoidance of system events	