

Consultation

The Commission is consulting on the System Control Technical Code (SCTC) amendments proposed by Power and Water Corporation (PWC) (at Appendix A). Submissions are requested by 5pm (ACST) Friday 16 June 2023. To facilitate publication, submissions should be provided electronically by email to utilities.commission@nt.gov.au in Adobe Acrobat or Microsoft Word.

Background

Under section 37B of the *Electricity Reform Act 2000*, the System Controller may make or amend a SCTC, which must be approved by the Utilities Commission. Regulation 5A of the *Electricity Reform (Administration) Regulations 2000* lists matters which the SCTC may make provision for, which include any matters relevant to the reliability, safety or security of the system or the monitoring or control of the operation of the system. The current version of the SCTC (version 6) came into effect on 30 March 2020.

In May 2021, PWC began consulting on proposed amendments to clauses 7 and 8, and the glossary, of the SCTC, which pertained to the power system incident reporting procedures. The following rationale was provided by PWC for the proposed amendments (in simplified terms):

- The thresholds for minor reportable incident classification is not fit for purpose.
- The process for varying incident classification criteria should be streamlined.
- There are no clear timelines in the SCTC for completing investigations into major reportable incidents.
- There is no established process in the Code for managing recommendations and negotiating actions stemming from major reportable incidents.

In September 2021, following stakeholder consultation, PWC submitted proposed amendments to the SCTC to the Commission for approval (the September 2021 Proposed Amendments).

Following consultation with the Commission, PWC submitted a revised version of its proposed amendments (the March 2023 Proposed Amendments; at Appendix A), which seeks to address the Commission's concerns with the September 2021 Proposed Amendments. As a consequence, there is a significant degree of variation between the September 2021 and March 2023 Proposed Amendments and the Commission encourages stakeholders to review the March 2023 Proposed Amendments and provide any relevant feedback.

March 2023 Proposed Amendments

A clean version of the March 2023 Proposed Amendments is provided at Appendix A.

A summary table, which provides a comparison of the current SCTC (version 6), the September 2021 Proposed Amendments and the March 2023 Proposed Amendments, along with a simplified description of the proposed change, is provided at Appendix B.

Overview of proposed amendments

A high-level summary of the more significant March 2023 Proposed Amendments is also provided under the sub-headings below. The proposed changes have been described in simplified terms for readability.

Incident Classification

- The definition of 'reportable incident' has been simplified. Detail regarding when an incident will be classified as a 'reportable incident' is now proposed to be contained in the Power System Incident Reporting Guidelines.
- The terminology and description of 'major' and 'minor' reportable incidents is proposed to be removed as this will no longer form part of the process.
- Amendments are proposed to include the following powers for the Power System Controller when classifying power system incidents:
 - o The Power System Controller may request System Participants provide information and assistance as is reasonably necessary, regardless of the Power System Controller's initial view on classification (with a corresponding obligation on System Participants to cooperate with the Power System Controller when such a request is made).
 - o The Power System Controller may reclassify an incident before concluding an investigation if of the view that it no longer satisfies the criteria of a reportable incident.

Reporting Timelines

- Timing obligations are proposed to be contained within the SCTC and not in any guidelines (a change compared to the September 2021 Proposed Amendments).
- Amendments are proposed to provide a maximum period of:
 - o three business days for system participants to notify the Power System Controller after becoming aware of a reportable incident
 - o three business days for the Power System Controller to notify System Participants and the Utilities Commission that a reportable incident has occurred
 - o five business days for System Participants to provide a brief report to the Power System Controller after receiving a request to investigate a reportable incident
 - o twenty business days for System Participants to provide a final report to the Power System Controller after receiving a request to investigate a reportable incident
 - o ten business days for the Power System Controller to provide a brief report to the Commission after receipt of notification of a reportable incident
 - o ninety business days for the Power System Controller to provide a final report to the Commission after receipt of notification of a reportable incident.
- Amendments are proposed to specify that an extension to the timeframes for a System Participant to provide a brief report can be provided by the Power System Controller.

Power System Incident Reporting Guideline

Amendments are proposed to:

- specify that the requirements for a System Participant's investigation may be contained in the Power System Incident Reporting Guidelines or in the Power System Controller's request
- include a purpose for the Power System Incident Reporting Guidelines (this purpose has been reduced in scope compared to the September 2021 Proposed Amendments)
- include a list of matters the Power System Incident Reporting Guidelines must cover (this list has been simplified and reduced in scope compared to the September 2021 Proposed Amendments)
- include obligations on the Power System Controller to consult and consider consistency with the SCTC when developing or amending the Power System Incident Reporting Guidelines
- remove the September 2021 Proposed Amendments which would have obliged the Power System Controller and System Participants to comply with the Power System Incident Reporting Guidelines
- remove the September 2021 Proposed Amendments which would have obliged the Network Operator ensure its access agreements require each Network User to support and assist the Network Operator to comply with clause 7 of the System Control Technical Code and the Power System Incident Reporting Guideline.

Managing actions arising from investigations

Amended to remove the September 2021 Proposed Amendments which would have:

- obliged the Power System Controller and System Participants to meet and negotiate actions to be undertaken by System Participants to prevent a repetition of the reportable incident
- obliged System Participants to undertake and complete the actions agreed with the Power System Controller
- obliged System Participants to provide evidence to the Power System Controller in order to determine that agreed actions and other recommendations have been completed or complied with.

Investigating, reviewing and reporting

Amendments are proposed to:

- include an obligation on the System Participant to investigate a reportable incident when requested by the Power System Controller
- include a power for the Power System Controller to request information and assistance when investigating, reviewing and reporting, with a corresponding obligation for System Participants to cooperate
- specify that the Power System Controller's Brief Report may include the Power System Controller's preliminary recommendations concerning the incident.

Regular reporting

Amendments are proposed to:

- remove an obligation for the Power System Controller to report on 'minor reportable incidents' in its half-yearly reports, as this classification is proposed to be removed
- include an obligation on the System Controller to provide its half-yearly report to System Participants, corresponding with a proposed amendment to remove an obligation on the Power System Controller to report quarterly to System Participants on their performance and major incidents
- change the Power System Controller's obligation to contribute to a System Participant's annual report to a discretion.

Other

Amendments are proposed to:

- change the opening clause to better reflect the purpose of clause 7 following the proposed amendments
- include a responsibility for the Network Operator to obtain information from Network Users as part of the investigation process
- include a power for the Power System Controller to require a System Participant to provide notice of a potential reportable incident.

Appendix

Appendix A – Proposed Amendments to the System Control Technical Code (March 2023) (Clean)

Appendix B – Summary Table of Proposed Amendments to the System Control Technical Code (March 2023)

Appendix C – Letter from PWC to the Commission submitting the proposed amendments to the System Control Technical Code – 20 March 2023