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To: The Electricity Authority

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### Improving outage coordination – Genesis Energy’s submission

Genesis Energy Limited (**Genesis**) welcomes the opportunity to comment on the Electricity Authority’s (**the Authority**) *First steps in improving outage coordination* consultation paper. We support the Authority’s work to improve electricity system security by update the outage notification obligations, and to include unplanned outages. We have identified areas where we think further clarification or changes are needed in the table on page two outlining our responses to the consultation questions.

Yours sincerely,

A handwritten signature in black ink that reads "Mitchell Trezona-Lecomte".

Mitch Trezona-Lecomte  
**Senior Advisor, Government Relations and Regulatory Affairs**

Questions	Comments
<p>Q1. Do you agree with the issues identified by the Authority?</p>	<p>We agree it is timely to update the process and support the Authority's intention of ensuring the process for coordinating outages remains clear and fit for purpose to ensure system security. To that end, we agree it is timely to include unplanned outages under notification requirements.</p>
<p>Q3. Do you agree with the proposed changes to outage coordination obligations on the system operator and asset owners? If not, what don't you agree with and why?</p>	<p>As noted, current industry practice is for asset owners to notify the system operator of any unplanned outages within 24 hours, and to an extent the Authority's proposal codifies this practice.</p> <p>Our main comments on the Authority's proposal are as follows:</p> <ul style="list-style-type: none"> <li>• We agree outage coordination obligations should apply to planned and unplanned outages as soon as reasonably possible. However, the proposed wording in schedule 8.3 (Technical Code D) clause 2 would require asset owners to notify the system operator "immediately". Typically, when an unplanned outage occurs, asset owners need to allocate resources towards determining the cause and nature of the problem, whether the problem can be resolved quickly, and the amount of time it may take to gather all material facts can vary. We therefore recommend this requirement be changed to require notification "as soon as is reasonably practicable". The Authority could also specify an appropriate maximum allowable time.</li> <li>• The proposal to allow the system operator to request return to service of an unplanned outage needs to be more clearly defined. The wording in Schedule 8.3 (Technical Code D) clause 7 (3) which would allow the system operator to "request an asset owner to terminate an unplanned outage in progress so that assets that are the subject of an unplanned outage can be returned to service as soon as possible", is potentially problematic. By their nature, unplanned outages are often caused by factors outside the control of asset owners. We suggest the wording be clarified so that it is clear the obligation only requires asset owners to terminate an unplanned outage "as soon as reasonably practicable", or words to that effect.</li> <li>• With regards to the proposal to expand the definition of outage to include a capacity reduction of an asset, the proposed wording in Appendix A, Part 1.1(a)(b) requires further definition to be workable. The key issue is the definition of "normal capacity". Under current wording, the amendment may require generators to notify the System Operator for even relatively minor generation asset trips. We therefore recommend the Authority or System Operator should define a minimum threshold for what is considered a reduction below "normal capacity".</li> <li>• We suggest the obligations could include an obligation to notify the estimated capacity (MW) and duration that will be impacted</li> </ul>

	<p>by the outage. Defining this would improve the information available to the system operator and provide certainty to asset owners regarding their disclosure obligations.</p>
<p>Q4. Do you agree the analysis presented in this regulatory statement? If not, why not?</p>	<p>We agree the benefits will likely outweigh the costs.</p>