

16 October 2017

Mr Steven Darnell
Principal Engineer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

REVIEW OF POWER SYSTEM DATA COMMUNICATIONS STANDARD: DRAFT REPORT

Dear Mr Darnell,

Energy Networks Australia welcomes this opportunity to provide input into the Australian Energy Market Operator's (AEMO) draft report on the Power System Data Communication Standard provided for consultation on 17 February 2017.

Energy Networks Australia is the national industry association representing the businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia.

The Power System Data Communication Standard (herein referred to as 'the Standard') is an important standard that ensures adequate communication of vital information needed for the National Electricity Market (NEM) to operate effectively. As the NEM electricity networks have evolved significantly since the current version of this standard was published in 2005, we consider it is timely that the Standard should be updated accordingly.

The 'Review of Power System Data Communication Standard Draft Report' has succinctly and accurately addressed feedback Energy Networks Australia provided to AEMO regarding the proposed revised Standard, in December 2016. The Draft Report contains several comments and questions posed by AEMO to Energy Networks Australia and other stakeholders, to which this letter aims to provide further detail.

Transitional arrangements

Energy Networks Australia welcomes the consultative approach taken by AEMO in regards to quantifying any substantive changes to the technical requirements of the Standard, and associated transitional arrangements. Energy Networks Australia notes that AEMO considers the technical requirements of the Standard remain unchanged, however some network service providers (NSPs) have advised they consider some of the cyber security related content, such as 'Continuous monitoring' under the 'Detect' function, may constitute a material change in requirements depending on interpretation. It is suggested that the language of 'Continuous monitoring' is altered to 'Timely monitoring'.

Cyber security

It has been recognised that the development of a specific separate standard or broader strategy to address cyber security is beyond the scope of the Standard, and Energy Networks Australia once

more welcomes AEMO's collaborative approach to working to pursue this matter as a separate initiative. In the meantime, Energy Networks Australia supports the revised contents of the Security section (Section 4).

Improved clarity and scope

Energy Networks Australia supports the introduction of the term 'Data Communication Providers' and its proposed definition. However, the term 'Data Concentrator' could be further defined, relative to whether a RTU (remote terminal unit) constitutes a 'data concentrator' for the purposes of the Standard. Attention is also drawn to whether AEMO intended to use the term 'A DCP' rather than 'A DCF' in its Data Concentrator definition.

Energy Networks Australia supports the revision and renaming of Section 2 'Performance of Operational Data' of the Standard; the intent of this Section is now much clearer.

Energy Networks Australia also considers that the revised diagram within Section 1.4 is now appropriate for its required purpose given the improved clarity of scope achieved through changes made elsewhere in the Standard.

Draft determination

Energy Networks Australia strongly supports accurate and secure data communication between NSPs and AEMO. Subject to addressing the minor recommendations outlined above, Energy Networks Australia supports AEMO determining to publish the proposed amendment of the Power System Data Communication Standard (Version 2) as final.

Should you have any additional queries, please feel free to contact Heath Frewin, Energy Network Australia's Senior Program Manager – Asset Management on (02) 6272 1531 or hfrewin@energynetworks.com.au

Yours sincerely,



Andrew Dillon

Interim Chief Executive Officer

