



# MAJOR ELECTRICITY USERS' GROUP

31 July 2013

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Project Manager  
System Operator

By email to [Justin.Blass@transpower.co.nz](mailto:Justin.Blass@transpower.co.nz)

Dear Justin

## AUFLS Framework

1. Thank you for the discussion with the Major Electricity Users' Group (MEUG) Executive Committee on 24<sup>th</sup> July on the System Operator Update Paper<sup>1</sup> "Automatic Under-Frequency Load Shedding (AUFLS) Framework" dated 30<sup>th</sup> June 2013. Members of MEUG have been consulted in the preparation of this submission. This submission is not confidential.
2. Responses to questions in the update paper follow:

Question	MEUG response
1. Do you agree that the proposed coordinated approach is likely to deliver better security and cost outcomes than the current "one-size-fits-all" obligation approach?	Agree the shift to 5 yearly reviews of new AUFLS standard, pre-event compliance requirements, more flexibility in how AUFLS is sourced and the proposed co-ordinated approach is likely to be an improvement on the status quo. The final technical design will need to fit with how procurement is decided by the EA.
2. Do you have any view on the types of criteria that could help achieve such outcomes?	The Update paper suggests no criteria though perhaps the question is about whether the proposed technical solution reduces the inefficiencies listed on page 9. A major inefficiency not listed is that the current regime eliminates load that is better used, from a national benefit point of view, for IL.

<sup>1</sup> [http://www.systemoperator.co.nz/f5573.84053156/20130630\\_AUFLS\\_update\\_Jun\\_2013.pdf](http://www.systemoperator.co.nz/f5573.84053156/20130630_AUFLS_update_Jun_2013.pdf) found at <http://www.systemoperator.co.nz/aufsls>

Question	MEUG response
3. Do you have any view on how load could be prioritized into the four proposed blocks, noting the operational differences between networks (incl. size and flexibility) as well as the different operational requirements for non-conforming load?	This needs to be considered by use of market mechanisms to ensure lowest cost provision as part of the EA Efficient Procurement of Extended Reserves work.
4. The AUFLS requirement has been designed on the assumption that all parties directly connected to the transmission network will share the obligation to allocate load to AUFLS. If this were to change, do you have a view on how the system requirement could be shared, noting the system's need for geographical diversity per island?	This should be considered as part of the EA Efficient Procurement of Extended Reserves work cognisant of the system operator's technical requirement for an optimal level of geographical spread.
5. In introducing the AUFLS framework, do you agree with the proposed introduction of an obligation on the System Operator to manage the AUFLS framework being specified in the Policy Statement?	This seems reasonable.
6. Do you agree with the proposal that the details of the AUFLS framework (the % requirement and AUFLS scheme) being included in an "AUFLS Policy"?	This seems reasonable.
7. Noting that the System Operator sees this as an incremental step in improving the AUFLS framework, do you have any views on what the future development of AUFLS should include?	It would be useful to have a better understanding of the timeline for integrating the EA work on Efficient Procurement of Extended Reserves and the opportunity to evolve towards (refer p 13) use of real-time monitoring of all AUFLS provided across an island and remote control of AUFLS relay setting (arm/disarm). We do not want to implement changes now only to find that is inconsistent with those longer term options.

3. We look forward to the System Operator publishing the supporting detailed technical paper.

Yours sincerely



Ralph Matthes  
Executive Director