

NER Clause	Task
<p><b>Clause 3.13.2(h) – Requirement to notify changes to submitted data</b>  <i>Clause 3.13.2(h) relevantly requires a Scheduled Generator or Market Participant to notify AEMO of any changes to submitted information within the times prescribed in the timetable.</i></p>	<p><input type="checkbox"/> Do you have systems, processes and personnel in place to ensure that AEMO is notified of any changes to submitted information as soon as possible?</p>
<p><b>Clause 3.7.3(e)(1) – Available capacity</b>  <i>Clause 3.7.3(e)(1) requires a Scheduled Generator or Market Participant to submit available capacity of each scheduled generating unit, wholesale demand response unit, scheduled load or scheduled network service for each 30-minute period under expected market conditions.</i>   <i>AEMO uses this information in reserve calculations.</i></p>	<p><input type="checkbox"/> Is the available capacity submission based on current intentions and best estimates?  <input type="checkbox"/> Have the available capacity values been provided 'under expected market conditions', including consideration of forecast weather conditions? Has a localised forecast been considered?  <input type="checkbox"/> Have the available capacity submissions been sculpted to fit the ambient condition profile across the trading day?  <input type="checkbox"/> Have forecast adverse ambient condition effects (e.g. air temperature, humidity, wind direction and speed, dust storms, solar irradiance, others?) been reflected in the capacity value consideration?  <input type="checkbox"/> Have any power improvement technologies (e.g. evaporative cooling, fogging) been considered in the capacity value consideration? Do your submissions reflect how you intend to use those technologies?  <input type="checkbox"/> Have other factors that can affect output (e.g. fuel quality, historic generator performance under similar conditions) been considered in the capacity value?  <input type="checkbox"/> For Demand Response Service Providers, are you monitoring factors such as spot price exposure and baseline compliance and submitting available capacity of zero when required?  <input type="checkbox"/> Have you assessed whether any relevant LOR notices have changed your incentives to operate such that you may wish to rebid to offer additional capacity?</p>
<p><b>Clause 3.7.3(e)(2) – PASA availability</b>  <i>Clause 3.7.3(e)(2) requires a Scheduled Generator or Market Participant to submit PASA availability of each scheduled generating unit, wholesale demand response unit, scheduled load or scheduled network service for each 30-minute period.</i>   <i>AEMO compares PASA availability to available capacity to help identify additional capacity to inform it of which units are or may be available for direction.</i>   <i>Note: this guidance may also be relevant for clause 3.7.2(d)(1) - MT PASA</i></p>	<p><input type="checkbox"/> Are the PASA availability values based on current intentions and best estimates?  <input type="checkbox"/> Does the submission represent what could be physically available on 24 hours' notice given the information at hand when the submission was made (regardless of cost)?  <input type="checkbox"/> Does the submission include capacity which relies on a reasonable expectation that fuel (and transport, if applicable) can be sourced on 24 hours' notice?  <input type="checkbox"/> Have any risks related to obtaining fuel been communicated to AEMO via the rebid reason field or direct contact with AEMO's control room?  <input type="checkbox"/> Have you assessed whether any relevant LOR notices have changed your decisions around your maintenance schedule and submitted accordingly?  <input type="checkbox"/> Is clarification of any MT PASA entry with AEMO required (if your situation cannot be otherwise accurately represented by standard processes) to allow AEMO to consider alternative methods of representation?</p>
<p><b>Clause 3.7.3(e)(4) – Daily energy availability for energy constrained plant</b>  <i>Clause 3.7.3(e)(4) requires a Scheduled Generator or Market Participant to submit projected daily energy availability for energy constrained scheduled generating units and energy constrained scheduled loads.</i>   <i>AEMO uses this information in reserve calculations.</i>   <i>Note: this guidance may also be relevant for clause 3.7.2(d)(2) - MT PASA</i></p>	<p><input type="checkbox"/> Does the portfolio include any scheduled generating units or scheduled loads that are energy constrained (i.e. being those that have fuel to run, but not at maximum capacity across the entire trading day)? If so, this obligation will need to be considered and declared regardless of fuel type or energy source.  <input type="checkbox"/> Is the daily energy availability submission based on current intentions and best estimates? Are any submissions based on what would reasonably be expected to occur given the current information and past experience? Did you submit a probability-weighted most likely view of fuel availability? Are the submissions consistent between ST PASA and MT PASA, recognising that these timeframes are linked?  <input type="checkbox"/> If fuel is limited or not available, have you submitted limits across the whole period where the limits is likely to continue? Do your submissions reflect how fuel will likely become available again (i.e., a step change or gradual return)?  <input type="checkbox"/> Is there a need provide AEMO with qualitative information relevant to energy limit submissions through the rebid reason field?  <input type="checkbox"/> For MT PASA, did you submit sustainable weekly limits that reflect the long-term capability of the plant and not a limit for the week considered in isolation?  <input type="checkbox"/> Are any unconstrained generating units represented by the submission of no value (a 'null entry') for the ST PASA daily energy limit? Are any generating units that are fully constrained by fuel (i.e. no fuel available) represented by the submission of a zero value for the ST PASA daily energy limit and the MT PASA weekly energy constraint? (Note: the approach for ST PASA has changed with the introduction of 5 minute settlement).  <input type="checkbox"/> Are any applicable environmental constraints accounted for in your submission?</p>
<p><b>Clauses 3.8.17, 3.8.18, 4.9.7(a) and 4.9.7(b) – Informing AEMO of self-commitment and self-decommitment decisions</b>  <i>Clauses 3.8.17, 3.8.18, 4.9.6 and 4.9.7 outline how and when a Scheduled Generator should inform AEMO of its intentions for self-commitment and self-decommitment of a scheduled generating unit.</i>   <i>Providing AEMO with the required notice, particularly for self decommitment, avoids situations where AEMO must direct generators to synchronise at short notice to meet system security requirements.</i></p>	<p><input type="checkbox"/> Have any Scheduled Generators with nameplate rating of 30 MW or more that are intended to self-commit and synchronise or self-decommit and de-synchronise, been immediately advised to AEMO through PASA and pre-dispatch by submitting an amended available capacity profile?  <input type="checkbox"/> Has an outline for self-commitment and self-decommitment been confirmed with AEMO advising the expected synchronising/de-synchronising time with at least one hour's notice?  <input type="checkbox"/> Has this advice been updated five minutes before synchronising/de-synchronising, or have other arrangements been agreed with AEMO?</p>
<p><b>Clause 3.8.20(g) – Pre-dispatch schedule and 4.9.8(b) – General responsibilities of Registered Participants</b>  <i>Clause 3.8.20(g) requires each Scheduled Generator, Demand Response Service Provider, Scheduled Network Service Provider and Market Customer (who has classified scheduled load) and Market Participant (who has classified an ancillary service generating unit or load) to ensure that it is able to dispatch the relevant plant as required under the pre-dispatch schedule and, if necessary to achieve this, is responsible for changing inputs via rebidding.</i>   <i>Clause 4.9.8(b) requires a Scheduled Generator to ensure that each of its scheduled generating units is at all times able to comply with the latest generation dispatch offer under Chapter 3 in respect of that generating unit.</i></p>	<p><input type="checkbox"/> Are traders seeking input from plant or load operations staff (as applicable) to inform the expected plant capability/availability before submitting dispatch offers?  <input type="checkbox"/> Are the current plant capabilities/availabilities being continually monitored and compared to the pre-dispatch schedule and the relevant dispatch targets from AEMO?  <input type="checkbox"/> If capabilities/availabilities are unlikely to meet the pre-dispatch schedule or dispatch target, have you informed AEMO of this through rebids, and if appropriate, by also contacting AEMO's control room directly?  <input type="checkbox"/> Are actual ambient temperatures being monitored and compared to the forecasts upon which offers were based, to determine whether offers for the remainder of the day should be updated?  <input type="checkbox"/> Are traders and operations staff communicating frequently during extreme weather events (when generation plant may be more likely to derate)?  <input type="checkbox"/> For Demand Response Service Providers, are you communicating dispatch targets to the relevant load operations staff and rebidding if required?  <input type="checkbox"/> Are there systems in place to monitor real-time generator/wholesale demand response unit output against targets and alert operations/trading staff where it is away from target?  <input type="checkbox"/> Are traders providing updated information to AEMO about current and anticipated plant capabilities?</p>
<p><b>Clause 3.8.8(b) – Validation of dispatch bids and offers</b>  <i>Clause 3.8.8(b) states that it is the responsibility of the Scheduled Generator or Market Participant to check that the data contained in its generation dispatch offer or market ancillary service offer, as received and to be used by AEMO in the central dispatch process, is correct.</i>   <b>Clauses 3.8.22(c) and 3.8.22(ca) – Rebidding</b>  <i>Clause 3.8.22(c) requires every rebid to be accompanied by a brief, verifiable and specific reason to AEMO, as well as the time when the generator became aware of the reason for the rebid.</i>  <i>Clause 3.8.22(ca) provides that a Scheduled Generator or Market Participant must make a contemporaneous record of a rebid made in the late rebidding period.</i>   <b>Clauses 3.8.22(a), 3.8.22(b) and 3.8.22(d) – Offers, bids and rebids must not be false or misleading</b>  <i>Clauses 3.8.22(a) requires that participants must not make a dispatch offer, dispatch bid or rebid that is false, misleading or likely to mislead.</i>  <i>3.8.22(b) provides that an offer/bid or rebid is taken to be false or misleading if the party making it does not have a genuine intention to honour, or does not have a reasonable basis for making, the representations contained within the offer.</i></p>	<p><input type="checkbox"/> Do you have systems and personnel in place to monitor operational and commercial factors that affect your offers, bids and rebids? Did you consider LOR notices as an input to your offers, bids and rebids?  <input type="checkbox"/> Are your bids, offers and rebids made with genuine intention on a reasonable basis? Do you have systems and personnel in place to ensure the bids, offers and rebids submitted reflect your commercial intention?  <input type="checkbox"/> Do you have systems and personnel in place to actively monitor the accuracy of offers, bids and rebids and to update AEMO if they are no longer accurate?  <input type="checkbox"/> Where you have automated systems in place, have you rostered technical and operational staff in a 24/7/365 fashion to maintain adequate manual oversight to ensure that the generating unit or load can comply with the latest market offer at all times? Do you have relevant personnel available to actively monitor generator output, offers and correct input of bid/rebid reasons and plant availability information?  <input type="checkbox"/> Are you familiar with the AER's Rebidding and Technical Parameters Guideline? Do you have processes and personnel in place to ensure technical parameters are bid in accordance with the Rules?  <input type="checkbox"/> Do you have systems and personnel in place to maintain relevant records such as rebid reasons and contemporaneous records in accordance with the relevant NER requirements?</p>
<p><b>Clauses 3.8.7A and 4.9.8(d) – Compliance with market ancillary offers</b>  <i>Clause 3.8.7A(k) requires an Ancillary Service Provider that submits a market ancillary service offer to ensure that the ancillary service generating unit or ancillary service load, as the case may be, is at all times capable of responding in the manner contemplated by the Market Ancillary Service Specification ( MASS ).</i>   <i>Clause 3.8.7A(l) requires the values in a market ancillary service offer to represent the technical characteristics of the ancillary service generating unit or ancillary service load.</i>   <i>Clause 3.8.7A(m) requires rebids of the values in a market ancillary service offer to represent technical characteristics at the time of dispatch.</i>   <i>Clause 4.9.8(d) requires a Market Participant which has classified a generating unit or load as an ancillary service generating unit or an ancillary service load, as the case may be, must ensure that the ancillary service generating unit or ancillary service load is at all times able to comply with the latest market ancillary service offer for the relevant trading interval.</i></p>	<p><input type="checkbox"/> Are any enabled FCAS services able to be delivered when required (as they are a key factor in ensuring AEMO can meet and maintain power system security)? Do you have the appropriate personnel and electronic facilities to support this delivery?  <input type="checkbox"/> Do you have systems and processes in place to monitor relevant plant settings and ensure high quality communication between traders and plant operators to ensure offers reflect actual capabilities at all times?  <input type="checkbox"/> Has your equipment been appropriately tested to ensure it is capable of meeting AEMO's MASS when your contingency FCAS offer is called upon?   <input type="checkbox"/> Is it necessary to test individual elements of control systems or processes in isolation to provide a reasonable level of assurance that the overall response is likely to perform effectively when required?  <input type="checkbox"/> Have there been any changes to plant, and if so, do these changes have the potential to impact on the ability to provide the services for which there is a commitment to provide? Do you have sound change management processes for any significant or non-routine plant changes that may affect contingency FCAS performance?  <input type="checkbox"/> Have you regularly assessed the actual frequency response of relevant plant that AEMO has enabled to provide contingency FCAS whenever the system frequency deviates from the normal operating frequency band, or otherwise specified in the MASS? Have learnings from those assessments been incorporated into your systems and processes?  <input type="checkbox"/> Have any identified issues been self-reported to the AEMO and/or the AER in a timely manner?  <input type="checkbox"/> Can you promptly comply with a request from AEMO to demonstrate the relevant plant's capability to provide the market ancillary service to the satisfaction of AEMO according to standard test procedures?  <input type="checkbox"/> Do you have systems and processes in place to ensure compliance with FCAS obligations when engaging contractors or business partners?  <input type="checkbox"/> Have you familiarised yourself with the requirements of the MASS and any relevant conditions and technical parameters agreed in your individual generator performance standards?  <input type="checkbox"/> Where you provide FCAS, have you reviewed your relevant FCAS obligations? The AER encourages participants to familiarise themselves with the AER's Contingency FCAS compliance bulletin which outlines our expectations regarding compliance with a number of critical obligations.</p>
<p><b>Clauses 3.11.2(f) and (h) – Market ancillary services</b>  <i>Clause 3.11.2(f) requires a Market Participant which has classified a generating unit as an ancillary service generating unit or a load as an ancillary service load to install and maintain, in accordance with standards developed by AEMO, monitoring equipment to monitor and record the response of the relevant unit or load to changes in the frequency of the power system.</i>   <i>Clause 3.11.2(h) states AEMO may request a report on how the relevant facility responded to a particular change in the frequency of the power system, and the Market Participant must provide this report promptly, but no more than 20 business days after AEMO's request.</i></p>	<p><input type="checkbox"/> Is a functioning data system in place to ensure the capture and 12 month retention of relevant ancillary service data in a form able to be provided to AEMO if requested?  <input type="checkbox"/> Is an audit of these systems required to confirm that they capture the required data in a manner that could be provided to AEMO if requested?  <input type="checkbox"/> Is the data system's storage capacity adequate to capture all of the required information?  <input type="checkbox"/> Is compliance with the market ancillary services offer supported by an appropriate testing and compliance program?</p>
<p><b>Clause 4.8.1 – advising AEMO of threats to the secure operation of the power system or equipment</b>  <i>A Registered Participant must promptly advise AEMO or a relevant System Operator at the time that the Registered Participant becomes aware, of any circumstance which could be expected to adversely affect the secure operation of the power system or any equipment owned or under the control of the Registered Participant or a Network Service Provider.</i></p>	<p><input type="checkbox"/> Have any identified risks (such as the potential to reduce output or go out of service), including those which you consider may have only a limited impact on power system security, been promptly communicated to AEMO so it may form a comprehensive understanding of any potential impacts on the power system?  <input type="checkbox"/> Do you have established systems and processes to remain informed of circumstances which could be expected to pose risks to equipment (primary and secondary, such as protection and control systems) or power system security? Do you monitor broader communications (e.g. market notices) and factor this information in to your decision making?  <input type="checkbox"/> Is training for operators and traders flexible to allow them to adapt to emerging risks within the power system security and communicate these risks to AEMO? Is training reviewed regularly and updated if required?  <input type="checkbox"/> Are you maintaining a holistic awareness of risks to equipment (primary and secondary) and power system security, even if you have contracted some of your functions to third parties?  <input type="checkbox"/> Do your procedures and guidelines for assessing risks to equipment (primary and secondary) and power system security consider AEMO's procedures, including the Power System Security Guidelines?  <input type="checkbox"/> Do you have up-to-date procedures and communication protocols to identify and communicate plant or equipment issues that have occurred or are likely to occur. This includes alarm/alert prioritisation processes, internal communication protocols and joint communication protocols between generators and NSPs.</p>
<p><b>Clause 4.9.9 – Scheduled Generator Plant Changes</b>  <i>A Scheduled Generator must, without delay, notify AEMO of any event which has changed or is likely to change the operational availability of any of its scheduled generating units, whether the relevant generating unit is synchronised or not, as soon as the Scheduled Generator becomes aware of the event.</i></p>	<p><input type="checkbox"/> Have any changes or possible changes in operational availability (whether the unit is synchronised or not) been promptly advised to AEMO?  <input type="checkbox"/> Are systems and processes in place to actively monitor the factors that affect the operational availability of plant allowing you to promptly notify AEMO of any changes or possible changes to plant (rather than relying on AEMO to make contact)?  <input type="checkbox"/> Has any event already changed the operational availability of the scheduled generating unit (including fuel constraint parameters, if appropriate), thereby requiring rebid(s) to AEMO updating offers or PASA to reflect the revised capability of the unit (including during the pre-dispatch period)?  <input type="checkbox"/> Does any event have implications (realised or potential) for the operational availability of a generating unit on an ongoing basis, such as a long term outage or impairment of a unit, that requires discussion with AEMO?</p>
<p><b>Clause 4.9.2(d) – Personnel to receive and immediately act upon dispatch instructions</b>  <i>A Scheduled Generator or Semi-Scheduled Generator must, with respect to its generating units that have an availability offer of greater than 0 MW (whether synchronised or not), ensure that appropriate personnel are available at all times to receive and immediately act upon dispatch instructions issued by AEMO to the relevant Generator.</i></p>	<p><input type="checkbox"/> Are sufficient resources available to control and direct generating units to meet dispatch instructions and to satisfy this obligation 'at all times'?  <input type="checkbox"/> If generation assets are being operated by third parties under contract, are there sufficient agreements between the parties to ensure these obligations are met?  <input type="checkbox"/> When preparing for market events, do you consider whether additional personnel will be required and plan accordingly?  <input type="checkbox"/> Do you have contingency plans in place to have extra personnel available to provide additional support if required to respond to market events?  <input type="checkbox"/> Are roles and responsibilities for equipment operation in response to AEMO dispatch instructions defined and agreed, including any agreements that exist between third parties?  <input type="checkbox"/> Have you considered making provisions to record telephone conversations with AEMO?</p>
<p><b>Clause 4.11.3 – Power system voice/data operational communication facilities</b>  <i>A Network Service Provider, System Operator, Distribution System Operator, Generator or Market Participant must advise AEMO of each nominated person for the purposes of giving or receiving operational communications in relation to each of its facilities.</i></p>	<p><input type="checkbox"/> Have you advised AEMO of each nominated person for the purposes of giving or receiving operation communications in relation to each of your facilities and provided the required details for each person?  <input type="checkbox"/> Do the nominated persons have the technical capability to receive instructions concerning the arrangements for, and actual operation of, the power system in accordance with the Electricity Rules and to carry out the relevant actions provided in section 116 of the National Electricity Law?  <input type="checkbox"/> Are the nominated persons still the best contact for AEMO and are the contact details provided to AEMO still current? Do you review these contact details regularly?  <input type="checkbox"/> Do you have systems and processes in place to ensure that communications systems are maintained and repaired within required timeframes?</p>
<p><b>Clause 4.15 – Compliance with generator performance standards</b>  <i>Generators are required to implement and maintain specific compliance programs in accordance with clause 4.15 of the Electricity Rules.</i></p>	<p><input type="checkbox"/> Has there been a breach or likely breach of a performance standard, requiring an immediate clause 4.15(f) Notice of Non-compliance with Registered Performance Standards to AEMO?  <input type="checkbox"/> Do you have systems, processes and personnel in place to ensure you rectify GPS related non compliance in a timely manner and in accordance with the rectification periods notified by AEMO?  <input type="checkbox"/> Are your ongoing generator performance standards compliance validation programs fully effective and up to date, notably during times of impending high demand or other adverse conditions?  <input type="checkbox"/> Are compliance programs and associated documentation up to date and prepared according to the current Reliability Panel template?  <input type="checkbox"/> Have you reviewed your testing requirements and, where possible, prioritised testing ahead of peak periods?  <input type="checkbox"/> Do you evaluate the effectiveness of your testing processes and procedures on an ongoing basis and update them when potential improvements are identified?</p>
<p><b>Good industry practice for trading and operational staff</b></p>	<p><input type="checkbox"/> Do you have an operational/trading manual for spot traders?  <input type="checkbox"/> Do you provide appropriate and sufficient induction training for new traders prior to them commencing operations? Does it provide information on the relevant support systems that your traders have access to for key information? For example, do they have timely access to a senior staff member if a contingency event occurs?  <input type="checkbox"/> Do you regularly conduct refresher training, internal reviews and de-briefs following market events or observed non-compliances with your trading and operational staff?  <input type="checkbox"/> Are your traders provided with relevant AER reference material such as the FCAS Compliance Bulletin and NEM Readiness Guide and required to familiarise themselves with these documents? Are they also provided relevant AEMO Procedures and guidelines? Do you keep up to date with changes made to these documents and update internal documents/training accordingly?  <input type="checkbox"/> Have you conducted contingency planning for trading and operational staff? Do you conduct simulated market event training to ensure that your staff understand their roles, obligations and appropriate rectifying responses in a range of scenarios? This should include common scenarios such as AEMO directions, or market event scenarios such as administered price caps and other possible contingency events.  <input type="checkbox"/> Do you verify that your staff understand and are familiar with the relevant internal and external communication protocols with key operational personnel and the AEMO control room? This may include contacts of key personnel, where to acquire key information to provide to AEMO in a contingency event and how to contact senior staff if required.</p>
<p><b>This information is provided as guidance only and is not an exhaustive list that guarantees compliance. Market participants will have to make a commercial decision about how best to operate, guided by private legal advice, where appropriate.</b></p>	