



Ref. A5290911

28 August 2023

Ms Elisabeth Coroneo
Project Leader
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Sent via email

Dear Ms Coroneo,

MINOR CHANGES 1 2023 RULE CHANGE PROPOSAL

Powerlink Queensland (Powerlink) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC's) of its July 2023 self-initiated Minor Changes 1 2023 Rule change proposal.

We acknowledge the AEMC's suggestion to amend clause 11.159.4 of the National Electricity Rules (the Rules) to clarify the applicable access standards for an application to connect. This transitional arrangement relates to the *Efficient reactive current access standards for inverter-based resources* Rule change completed in April 2023.

Powerlink understood the intent of the new reactive current minimum access standard was that the new standard should apply to all asynchronous generator connection enquiries and applications to connect for which an offer to connect had not yet been received. Furthermore, we also understood that adoption of the new minimum access standard for reactive current injection during a fault would not affect a connecting party's eligibility to proceed with system strength mitigation under the former do no harm framework or the new evolved framework that applies to new applications to connect from 15 March 2023.

We consider the current drafting of clause 11.159.4(b)(2) implies a proponent who submitted an application to connect before 15 March 2023 cannot use the flexibility of the new reactive current minimum access standard and continue to connect under the former system strength framework. This reflects that clause 11.159.4(b)(2) currently states that an existing application to connect will come under the new Chapter 5 with respect to the proposed plant. We consider this was an oversight with the drafting and not consistent with the intended outcomes as outlined in the *Efficient reactive current access standards for inverter-based resources* Final Determination.

As part of this Rule change process, we request the AEMC amend clause 11.159.4 to clarify that proponents who submitted an application to connect before 15 March 2023 can continue

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the connection process under the former system strength framework and can adopt the new reactive current minimum access standard.

We appreciate the engagement with AEMC staff members on this matter to date.

If you have any questions regarding this submission or would like to meet with Powerlink to discuss this matter further, please contact Mr Sachin Goyal (Manager, Power System Performance and Connections) on (07) 3866 1119 or email sachin.goyal@powerlink.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'P. Ascione', written in a cursive style.

Paul Ascione
GENERAL MANAGER, ASSET STRATEGIES AND PLANNING