



10 January 2025

Australian Energy Market Commission (AEMC)

Lodged online: www.aemc.gov.au

Dear AEMC,

Improving the NEM access standards – Package 1

Trina Projects Holding Australia Pty Ltd (Trina) welcomes the opportunity to provide comment on the Australian Energy Market Commission's (AEMC) draft determination and draft rule to improve the National Electricity Market (NEM) access standards.

As a part of the multinational Trinasolar group and the Trinasolar group's International Systems Business Unit (ISBU) Trina is a utility-scale solar power and battery storage solutions developer committed to being a global leader in the development and management of smart renewable energy solutions.

Trina welcomes AEMC's initiative to improve the NEM access standards. In order to support AEMC meet the aim of this proposed rule change to lower connection costs and promote faster connections Trina proposes the following modifications to clause S5.2.5.13 in regards to the power oscillation damping capability for asynchronous production units:

It is proposed that clause S5.2.5.13 (b) 4 (vii) (B) be modified as follows:

- (B) demonstrates an opposition to all voltage modulated frequencies as defined by AEMO for oscillation rejection testing for the range of system impedances nominated by the Network Service Provider under paragraph (m).

This modified sub clause (B) should allow for compliance to be met by asynchronous production units through the performance of oscillation rejection tests in lieu of the installation of a dedicated power system stabiliser, which does not come standard with most asynchronous production units, and in lieu of the publishing of dedicated asynchronous production unit characteristics by AEMO. This modification to the rules will provide certainty and clarity for the increasing number of asynchronous inverter-based resources in the NEM. It will negate the constant need to negotiate on this particular performance standard due to the lack of a dedicated power system stabiliser.

For more details or to discuss any aspect of this submission please contact the below signed at craig.aumuller@trinasolar.com.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Craig Aumuller

Grid Connection Manager