

28 January 2025

Ms Anna Collyer
Level 15
60 Castlereagh Street
Sydney NSW 2000

Dear Ms Collyer,

AEMO submission to Improving the NEM access standards – Package 1 ERC0393

We are pleased to have this opportunity to submit on the AEMC’s draft rule to improve the National Electricity market (NEM) access standards.

AEMO supports the AEMC’s draft rule and its use of the fast-track consultation process. As articulated in our rule change proposal, we consider that the rule will:

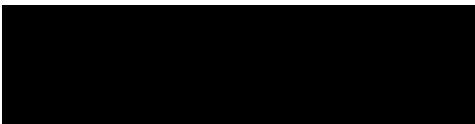
- Streamline the connection process – accelerating the connection of new generation necessary to deliver on targets to reduce Australia’s greenhouse gas emissions and bringing forward the benefits of new connections for electricity consumers.
- Improve the resilience of the NEM – reducing the risk of interruptions to electricity supply.
- Support efficient investment in and operation of the NEM – reducing the cost of electricity.
- Better accommodate new and evolving technologies – allowing the NEM to realise the benefits of these technologies.

We note that other processes are underway (including our reviews of large load standards and grid forming technologies) that may consider residual access standards issues, which cannot be readily addressed in this fast-track rule change process.

In the attached submission we propose some detailed changes to improve or clarify aspects of the AEMC’s draft rule.

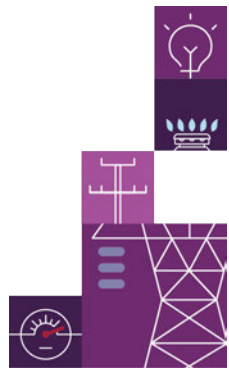
Please contact Hannah Heath at (hannah.heath@aemo.com.au) for any questions or clarifications.

Yours sincerely,



Violette Mouchaileh
Executive General Manager - Reform Delivery

Attachment: AEMO submission to Improving the NEM access standards – Package 1



Attachment: AEMO submission to Improving the NEM access standards – Package 1

AEMO welcomes the draft rule and the AEMC's decision to fast-track the consultation process for package 1. The AEMC's draft rule gives effect to AEMO's fast-track rule change request. AEMO supports the AEMC's draft rule, subject to some detailed adjustments set out in this submission. Part 1 of this submission outlines why AEMO supports the draft rule. Part 2 explains the detailed adjustments we consider should be made to the draft rule.

The technical access standards for connection to the power system will require regular review, particularly in periods when power system technologies are rapidly evolving. Whilst the draft rule makes much-needed updates to the access standards, AEMO recognises that further changes are desirable in the near future to better accommodate the capability of existing and emerging conditions and technologies. Due to the need for further information, analysis or consultation, it was not feasible to include fully worked proposals to address all these matters our fast-track rule change proposal. Other processes are under way (or are due to be initiated presently) to consider further changes, including:

- The second rule change proposal that AEMO submitted to the AEMC in April 2024 (package 2 - for consultation under a standard process).
- AEMO's review of access standards for large loads.
- AEMO's review of access standards for grid-forming (GFM) technology.

These other processes are summarised in part 3 of this submission and may address any residual concerns that stakeholders might raise in submissions to the draft rule.

1 Why AEMO supports the draft rule

1.1 Stakeholder engagement and fast-tracking

The AEMC's draft rule gives effect to AEMO's fast-track access standards rule change request, substantially as proposed. The proposed amendments were developed after extensive stakeholder consultation, to provide solutions, clarification, and consistency on a prioritised range of existing and emerging connection issues arising from aspects of the technical access standards. The issues, solutions, stakeholder perspectives and responses are set out in detail in the publications for AEMO's 2022-2023 access standards review,¹ which led directly to the package 1 and package 2 rule change proposals.

Fast-tracking the rule will bring forward the benefits of the rule change and recognises the significant input of stakeholders into AEMO's access standards review. This input included participation in workshops, public submissions and targeted engagement with particularly affected stakeholder groups such as network service providers (NSPs), generators, developers, original equipment manufacturers (OEMs) and large customer representatives. This constructive stakeholder input allowed AEMO to identify, prioritise and test alternative solutions for issues relating to the access standards, before submitting our rule change proposal, providing confidence that the proposed changes are necessary, robust and aligned with the national electricity objective.

¹ Conducted under clause 5.2.6A, published at: <https://aemo.com.au/consultations/current-and-closed-consultations/aemo-review-of-technical-requirements-for-connection>

1.2 The need for change

The energy transition is well underway, and the NEM needs to grow and change to continue delivering secure, reliable and affordable electricity to millions of Australians whilst achieving emissions reduction targets. AEMO's 2024 Integrated System Plan (ISP) optimal development path projects grid-scale variable renewable energy would need to triple by 2030 and increase six-fold by 2050.²

To successfully navigate the energy transition, further significant non-generating plant must also be added to the NEM, including high voltage direct current (HVDC) interconnectors, synchronous condensers and energy storage systems. These technologies are necessary to maintain the security of the NEM when coal-fired power stations exit the market and the AEMC's draft rule will facilitate their efficient and secure connection. We consider the draft rule, taken as a whole, will:

- Streamline the connection process – accelerating the connection of new generation necessary to deliver on targets to reduce Australia's greenhouse gas emissions and bringing forward the benefits of new connections for electricity consumers.
- Improve the resilience of the NEM – reducing the risk of interruptions to electricity supply.
- Support efficient investment in and operation of the NEM – reducing the cost of electricity.
- Better accommodate new and evolving technologies – allowing the NEM to realise the benefits of these technologies.

Ultimately, AEMO considers these changes are necessary to support the energy transition in a manner consistent with the national electricity objective.

1.3 The more preferable rule

Subject to the detailed comments in part 2 of this submission, AEMO is supportive of the additions and adjustments to AEMO's proposed drafting, as set out in the draft rule. In general, these changes improve the effectiveness of the rule to implement the intent of AEMO's rule change request, including by, incorporating transitional arrangements, making necessary consequential changes to the rules and improving clarity and specificity.

1.3.1 Transitional arrangements

The AEMC's draft rule specifies transitional arrangements outlining how the different versions of the rules will apply to connection applications currently in train, in summary:

- Having the old rules apply to connections for which the connection applicant has received an offer to connect.
- Having the new rules apply to connection enquiries where a connection application has not yet been made.
- For connections for which a connection application has been made but a connection offer has not been received, allowing the connection applicant to choose to negotiate standards in accordance with the old rules, subject to reasonable limits.

AEMO considers that, in principle, these transitional arrangements are appropriate for each stage of the connection negotiation process. However, AEMO suggests the draft rule could be refined to address

² AEMO, 2024 Integrated System Plan for the National Electricity Market, p 11, at <https://aemo.com.au/-/media/files/major-publications/isp/2024/2024-integrated-system-plan-isp.pdf?la=en>

issues that arise in practice with long-running connection applications, making it difficult to interpret or apply the 'old' or 'new' rules in a range of situations. AEMO's suggestions are included in part 2 of this submission.

AEMO also supports a 12-month transitional period for NSPs to document the performance of any plant within their networks meeting the criteria for coverage under the chapter 5 schedules. Additional clarification for existing network plant is also suggested in part 2 of this submission.

1.3.2 Necessary consequential amendments

The AEMC has updated other parts of the rules as necessary to give effect to the access standards rule change proposal. These amendments are necessary and include:

- Additional amendments for consistency with changes to the definition and usage of terms such as 'voltage', 'production system', 'schedule 5.2 participant', etc.
- Updating or deleting cross references in the rules as necessary to reflect the amendments.
- Amendments to reflect changes made to the rules after AEMO submitted the rule change request.

1.3.3 Improving clarity and specificity

The draft rule also addresses some minor errors and omissions in the proposed rule and clarifies the application of new rights and obligations. For example, the draft rule:

- Adjusts clauses 5.2.1 and 5.2.2 to separate the obligations consistent with the existing designation of civil penalty provisions (subject to clarification on clause S5.2.3(b), noted in part 2 of this submission).
- Updates clause S5.2.5.4 to specify that active power requirements do not apply to synchronous condensers and improve the precision of the drafting that applies the different thresholds in S5.2.5.4(a).

AEMO considers these amendments improve the clarity and interpretation of the rules.

2 Clarifications and recommended improvements to the draft rule

2.1 Schedule 5.2 and Schedule 5.3 Participants

AEMO's proposal changed the application of each of the access standard schedules from registered participant categories to plant characteristics. It remains necessary for the rules to apply to an appropriate person in respect of that plant. AEMO therefore proposed new terms – 'Schedule 5.2 Participants', 'Schedule 5.3 Participants' and 'Schedule 5.3a Participants'. The draft rule incorporates those definitions as proposed by AEMO.

In schedules 5.2 and 5.3, AEMO proposed to use the existing defined term 'Connection Applicant' to replace references to registered participants³. Although this is a suitable substitute in circumstances where requirements apply in the context of a connection (or alteration) negotiation, some rights and obligations are intended to apply to connected schedule 5.2 or schedule 5.3 plant on an ongoing basis. In those circumstances, the plant owner or operator no longer meets the definition of a 'Connection Applicant'.

AEMO considers a simple way to correct this issue is to expand the definitions of a Schedule 5.2/5.3 Participant to include the party to a connection agreement with the NSP in respect of relevant plant. Suggested drafting is included in the appendix.

2.2 Transitional arrangements for in-progress connection applications

It has become common practice for transitional rules to allow connection applicants with a submitted application in progress on the effective date (but no formal connection offer) to continue negotiating on the basis of the access standards in effect when the application was submitted, often giving the applicant a right to choose the new or former standards. AEMO accepts this practice, but notes that the application of previous transitional rules has been challenging in some cases, for example where:

- A connection application remains open for an extended period, potentially years, during which time network conditions will change, and often also the proposed connected equipment and its configuration.
- Multiple separate rule changes have altered the NER access standards since submission of the connection application, each with transitional provisions grandfathering 'old' chapter 5' as in force immediately before the subject rule change.
- Transitional rules refer to the entirety of chapter 5 (old or new), which may create anomalies or undesirable inflexibility, or unnecessarily preserve 'old' provisions in other parts of chapter 5.

As the revised access standards in package 1 should provide greater certainty and flexibility for connection applicants, it is hoped that many will prefer to continue their connection application using the new standards. Where they elect to continue with the old standards, however, the draft rule limits the period within which access standards under the old provisions can be agreed. AEMO understands that the effect of this transitional clause is, in summary:

- If a connection applicant elects to continue under old chapter 5, the application progresses under chapter 5 as in effect immediately before commencement of the final rule, including the negotiation

³ The issue does not arise for the definition of a Schedule 5.3a Participant.

provisions and the access standards themselves, and excluding any derogations that may have applied to the application from previous transitional rules.⁴

- It is not possible to agree a mixture of old and new access standards.
- If all applicable access standards under old chapter 5 are 'agreed' within a transitional period (around 6 months) after rule commencement or agreed subject to conditions that are met within a further period that the NSP specifies, old chapter 5 continues to apply to the determination of access standards, ultimately becoming the performance standards in a connection agreement.
- If less than all access standards are agreed within the transitional period, or any condition (which could include execution of the connection agreement) is not met within the specified time, then all access standards must be negotiated under new chapter 5.

AEMO requests that the AEMC confirm in its final determination the intended application of these transitional rules to in-progress connection applications. We would also welcome further consideration of the transitional provisions to address practical issues and potential inefficiencies for extended connection applications. In particular:

- Allowing NSPs a discretion (in consultation with AEMO for AEMO advisory matters) to determine whether previously grandfathered access standards can continue to apply to the proposed connection, considering impacts on power system security and quality of service.
- Providing the flexibility for the applicant to elect which new access standards it wishes to proceed with (rather than all old or all new).
- At the end of the transitional period, or by the condition's fulfilment date, giving NSPs (in consultation with AEMO for AEMO advisory matters) a discretion to determine that one or more access standards can nevertheless continue to be negotiated under old chapter 5. This will minimise unnecessary cost and delay involved in renegotiation and potentially significant rework for performance capabilities that may not make a material difference to power system outcomes at the connection point.

2.3 Documentation of performance standards for relevant existing network plant

As proposed by AEMO, clause 5.2.3(c1) of the draft rule incorporates a requirement for NSPs to document and advise AEMO of the performance standards for items of network plant for which access standards are specified in schedule 5.2 or 5.3a. The AEMC has proposed a transitional rule allowing 12 months to comply with this requirement.

AEMO considers this requirement is necessary to promote visibility and certainty of the operation and capabilities of network plant such as synchronous condensers, to support secure power system operation. However, on reviewing the drafting, additional provisions may be needed to clarify that the performance standards of legacy plant are not required to conform to the new access standards, recognising that current and future access standards may not have been applicable to the assets at the time they were committed.

To clarify the position, AEMO suggests that clause 11.[xxx].2 should require NSPs to document and advise AEMO of performance standards for existing or committed plant with reference to the new access standards, but only to the extent of the plant's actual capabilities. Suggested drafting is included in the appendix.

⁴ e.g. 11.143.9(b)(1)

2.4 NSP civil penalty provision

Consistent with AEMO's proposal, the draft rule markup indicates the AEMC will recommend that the NSP requirement in clause 5.2.3(b) to comply with the schedule 5.1 standards no longer be classified as a civil penalty provision. However, AEMO originally suggested this on the basis that a revised clause 5.2.1 - to provide, maintain and operate facilities in accordance with the rules – would be a civil penalty provision. As that is not the case in the draft rule, AEMO considers the existing civil penalty must be retained for clause 5.2.3(b).

2.5 Transitional provisions for procedures

The AEMC has made additional, necessary changes to clause S5.5.7(b1), as the power system model guidelines need to extend to schedule 5 participants who may not also be registered participants. These amendments will require AEMO to make minor consequential changes to those guidelines. AEMO suggests a transitional provision would be appropriate to allow AEMO to comply with the applicable consultation procedures to formalise those changes. Interim provisions could be considered that provide for relevant schedule 5.2, 5.3 or 5.3a participants to comply with the guidelines as expressed to apply to generators, customers/network users or market network service providers respectively. Suggested drafting is included in the appendix.

2.6 Other minor drafting suggestions

AEMO has identified other minor drafting corrections or proposed improvements, listed in the appendix for the AEMC's consideration. These include omissions from AEMO's proposal as well as inconsistencies arising from adjustments made in the draft rule.

3 Ongoing access standards rule changes and reviews

Given the input received as part of the review undertaken there is a need for regular and ongoing review of the NEM's access standards. As such, it may be impractical to make all desired amendments to the access standards raised in submissions as part of a single rule change process. To this end, AEMO has several other processes that have been initiated, or will be initiated, to identify further desirable updates to the access standards. In this section we outline these processes.

3.1 Pending access standards rule change request

In addition to this fast-track rule change, AEMO has proposed a second rule change request (Improving the NEM access standards – package 2) covering issues or solutions that may not have been fully canvassed in the 2022-23 access standards review and are likely to benefit from an additional stage of consultation by the AEMC. The proposed rule amendments in that request include:

- Clarifying what constitutes a credible contingency event for disturbance ride-through capability requirements (clause S5.2.5.5).
- Apply additional light-handed requirements to the access standards for load connections to improve visibility and management of the capabilities and behaviour of prospective large load connections (with a particular focus on large inverter-based loads).

- Allowing AEMO to extend the timeframe for future access standard reviews under clause 5.2.6A if considered necessary due to complexity or a material change in circumstances, on publication of a notice with reasons.
- Modify clause S5.3a.7 to allow high-voltage direct current links to procure system strength under a third-party arrangement if they are otherwise unable to operate stably and remain connected at a short circuit ratio of 3.0 or lower.
- Extending some testing and commissioning provisions to apply to non-registered participants whose plant may have a material impact on other power system equipment and are therefore 'Schedule 5 Participants'.

3.2 Large loads access standards review

AEMO has initiated a review into the access standards for large loads. For further information on this review, including how to participate, please see AEMO's website.⁵ The objectives for AEMO's review of large loads are to:

- Incorporate impact and capability of large loads into technical requirements – to accommodate the anticipated growth of large inverter-based loads (for example, large hydrogen electrolyzers and data centres), ensuring they have appropriate standards to support their operation as part of the energy transition.
- Support efficient investment and operation – to promote more efficient investment and efficient operation in the NEM, consistent with the NEO. For some technical standards there would be a trade-off between capital expenditure or operating expenditure and the resulting technical performance. In some situations, the required performance may be beyond that which is useful or usable or could be provided more cost-effectively in another way.
- Efficient negotiation of performance standards – this review will likely recommend an increase in the scope of schedule 5.3 and the associated load performance standards. Therefore, the additional technical requirements for large loads should be clearly expressed to effectively manage the high volume of connections anticipated in the future without compromising power system security.
- Improve power system resilience – to orient the technical standards towards more resilient performance under abnormal power system conditions, or where system strength may be low. As the NEM generation mix changes, system strength will be a key challenge with the retirement of synchronous generation. A lack of system strength can have adverse consequences for power system stability, especially when the system is under stress during multiple contingency events. The technical standards can support resilient operation of the power system by focusing standards related to riding through and supporting the system's operation during system disturbances.

The scope of the large loads review will be limited to reviewing the access standards for large loads (and any consequential rule amendments that may be required to give effect to updated access standards). This excludes the rules that govern how large loads participate in the market and obligations on large loads beyond the access standards.

⁵ <https://aemo.com.au/consultations/current-and-closed-consultations/aemo-review-of-technical-requirements-for-connection#:~:text=Under%20clause%205.2.6A%20%28a%29%20of%20the%20National%20Electricity,to%20as%20sess%20whether%20those%20requirements%20should%20be%20amended.>

3.3 Grid forming technology access standards review

AEMO considers that there is potential, through changing the access standards, to facilitate more efficient integration and application of GFM inverters to support the secure operation of the NEM, as the number of inverter-based resources (IBR) increases and synchronous generation decreases. AEMO acknowledges that the current technical standards for asynchronous generating systems in schedule 5.2 may require improvements to better capture the unique capabilities and limitations of schedule 5.2 plant with GFM technology.

Further information please see AEMO's website.⁶ The objectives of the review are to:

- Appropriately define GFM technology to ensure that GFM-specific access standards are correctly applied.
- Update access standards for generating systems with GFM technology to ensure that access standards appropriately reflect the capabilities and limitations of GFM technology without creating unnecessary barriers to their connection.

As for large loads, the scope of AEMO's review will focus on the access standards and will not consider the broader treatment of GFM technology under the rules.

3.4 The next access standards review

Regular reviews of the access standards are necessary to ensure that access standards remain fit for purpose in a modern and rapidly transforming power system. To this end, the rules require AEMO to review the NEM's access standards at least once every five years having regard to:

1. the national electricity objective;
2. the need to achieve and maintain power system security;
3. changes in power system conditions; and
4. changes in technology and capabilities of facilities and plant.⁷

Given the pace of change and the complexity of the issues involved, AEMO may decide to initiate the next access standards review earlier than the scheduled 5-year interval.

⁶ <https://aemo.com.au/consultations/current-and-closed-consultations/aemo-review-of-technical-requirements-for-connection#:~:text=Under%20clause%205.2.6A%20%28a%29%20of%20the%20National%20Electricity,to%20as sess%20whether%20those%20requirements%20should%20be%20amended.>

⁷ Clause 5.2.6A.

Appendix

The following is AEMO's list of suggested drafting corrections and improvements, relative to the AEMC's draft amending rule on improving the NEM access standards – package 1.

We also noted some inconsistencies between the draft amending rule and markup formats. Given the amending rule format is the authoritative version, we have not listed these here.

Clause	Description	AEMO proposed change
5.1.2(d)	Minor correction	In item 6 of the table, move the word ' <i>plant</i> ' from the end of the first line to the start of the first dot point.
5.2.3(b)	Unintended result of drafting changes	Retain this paragraph as a civil penalty provision.
5.2.3(c)	Minor correction	Reverse the omitted and substituted phrases, i.e. 'the' should become 'a <i>connection agreement</i> '.
5.3.1A(c)(4)	Minor correction	Delete 'a' before 'person'.
5.3.4A(b)(1A)	Alignment with R1 rule	In the 4 th line, replace 'is less onerous than' with 'is below'. In the 6 th line, delete 'as' between 'otherwise' and 'agreed'.
5.3.9(a)	Minor correction	In the second line, reinsert 'or a <i>schedule 5.2 plant</i> ' after 'a <i>connected schedule 5.2 plant</i> '.
S5.2.1(b)	Align definition with obligations	In the 1 st line of subparas (1), (2) and (3), insert after ' <i>Connection Applicant</i> ': 'or the party to a <i>connection agreement</i> with the <i>Network Service Provider</i> '.
S5.2.5.1(f)	Formatting	In the note, italicise 'network' before 'support'.
S5.2.5.3(a)	Formatting	Sub-paragraph numbering to be sequential.
S5.2.5.4(b)	Consistency	Clarifications of the ranges added in the AAS are also needed in the MAS, i.e. 'over...up to and including...' in subparas (1) and (2), and 'below...down to and including' in subparas (4) and (5).
S5.2.5.5A(c)(1)	Cross-reference	'(ed)' should be '(d)'.
S5.2.5.8(a1)(2)	Punctuation	Replace the semicolon at the end with a comma.
S5.2.5.11(b)(2)	Minor correction	In the initial paragraph, change 'automatically provides' to 'automatically provide'. Indent the last paragraph.
S5.2.5.15(c)	Minor correction	After 'performance standards must', replace 'accord' with 'record'.
S5.2.8(a)(3)	Minor correction	After ' <i>production units</i> ', replace 'and' with 'or'.
S5.3.1a(a1)	Align definition with obligations	In the 1 st line of subparas (1) and (2), insert after ' <i>Connection Applicant</i> ': 'or the party to a <i>connection agreement</i> with the <i>Network Service Provider</i> '.
Schedule 5.5	Consequential amendments	These technical details are relevant to all connected plant covered by the chapter 5 schedules, including plant that may not be owned/operated by a registered participant. The draft rule amends some, but not all, references to registered participants. Further amendments are suggested in the rows below.
S5.5.1	Consequential amendment	In the first line, replace 'that <i>Registered Participants</i> ' with ' <i>Schedule 5 Participants</i> to'.
S5.5.2	Consequential amendment	In the paragraphs headed 'Registered system planning data' and 'Registered data', replace ' <i>Registered Participant</i> ' with ' <i>Schedule 5 Participant</i> '.
S5.5.3	Consequential amendment	Replace the first instance of ' <i>Registered Participant</i> ' with ' <i>Schedule 5 Participant</i> '. Delete the last paragraph as it inaccurately summarises information provisions elsewhere in the rules.
S5.5.4(b)	Consequential amendment	Replace paragraph (b) in the draft rule with: 'The applicable documents and schedules are: (1) <i>Schedule 5.2 Participants</i> : the <i>Power System Model Guidelines</i> , <i>Power System Design Data Sheet</i> and <i>Power System Setting Data Sheet</i> ; (2) <i>Schedule 5.3 Participants</i> and <i>Network Service Providers</i> : Schedules 5.5.3, 5.5.4 and the <i>Power System Model Guidelines</i> , <i>Power System Design Data Sheet</i> and <i>Power System Setting Data Sheet</i> ; (3) <i>Schedule 5.3 Participants</i> : Schedule 5.5.5 and the <i>Power System Model Guidelines</i> , <i>Power System Design Data Sheet</i> and <i>Power System Setting Data Sheet</i> ; and (4) <i>Schedule 5.3a Participants</i> : Schedules 5.5.3, 5.5.4 and the <i>Power System Model Guidelines</i> , <i>Power System Design Data Sheet</i> and <i>Power System Setting Data Sheet</i> .'

Clause	Description	AEMO proposed change
S5.5.6A	Consequential amendment	Replace ' <i>Integrated Resource Provider</i> ' with ' <i>Schedule 5.2 Participant</i> '
S5.5.7(b1)	Minor correction	In subparagraphs (iv) and (iv) ' <i>Customer</i> ', ' <i>Schedule 5.3 Participant</i> ' and ' <i>Schedule 5.3a Participant</i> ' should all be plural.
S5.5.7(c)(1)	Consequential amendment	Delete the words ' <i>by Registered Participants</i> '.
Sch 5.5.3	Consequential amendments	Under the heading ' <i>Short Circuit Infeed to the Network</i> ': <ul style="list-style-type: none"> Replace '<i>production units connected to the Registered Participant's system</i>' with '<i>connected production units</i>'. For the last two items, replace '<i>Registered Participant's network</i>' with '<i>the network</i>'.
Sch 5.6 Part A	Consequential amendment	In paragraphs (c1) and (g1), replace ' <i>Connection Applicant</i> ' with ' <i>Schedule 5 Participant</i> '. In paragraph (g), replace ' <i>Registered Participant</i> ' with ' <i>Schedule 5 Participant</i> '.
<i>power transfer</i> definition	Formatting	Italicise the last word ('networks').
<i>short circuit fault</i> definition	Consequential amendment	A short circuit fault need not necessarily have a metallic conducting path. This is consistent with the deletion of S5.2.5.5(a).
11.[xxx].2	Clarification	Delete the words ' <i>for existing plant</i> ' in the heading. Amend paragraph (b) and add paragraph (c) as follows: (b) For relevant <i>plant</i> in existence or <i>considered projects</i> as at the commencement date, the <i>Network Service Provider</i> must: (1) document <i>performance standards</i> for each applicable technical requirement by reference to the <i>access standards</i> under the new chapter 5, but only to the extent consistent with the actual capability of the <i>plant</i> in respect of each such requirement when the <i>plant</i> is operated in accordance with <i>good electricity industry practice</i> ; and (2) advise AEMO of those <i>performance standards</i> within [12 months] of the commencement date. (c) A <i>performance standard</i> established in accordance with paragraph (b)(1) may be below the <i>minimum access standard</i> applicable to the relevant technical requirement.
11.[xxx].4	Clarification	See section 2.4 of this submission for discussion of additional clarification and flexibility that may be desirable. In the initial paragraph of (e), before ' <i>AEMO</i> ', insert ' <i>(for AEMO advisory matters)</i> ' In the initial paragraph of (f)(6), after ' <i>AEMO</i> ' insert ' <i>for AEMO advisory matters</i> '.
11 [new]	Additional transitional clause	(a) By [4 months after the commencement date] AEMO must amend and publish the <i>Power System Model Guidelines</i> to take into account the Amending Rule. (b) Between the commencement date and the publication of amended <i>Power System Model Guidelines</i> in accordance with paragraph (a), references in those guidelines to: (1) a <i>Generator</i> or <i>Integrated Service Provider</i> are taken to include any <i>Schedule 5.2 Participant</i> to the extent applicable to its <i>schedule 5.2 plant</i> ; (2) a <i>Network User</i> or <i>Customer</i> are taken to include any <i>Schedule 5.3 Participant</i> to the extent applicable to its <i>schedule 5.3 plant</i> ; and (3) a <i>Market Network Service Provider</i> are taken to include any <i>Schedule 5.3a Participant</i> to the extent applicable to its <i>schedule 5.3a plant</i> .