Tasmanian Networks Pty Ltd
ABN 24 167 357 299
PO Box 606, Moonah, TAS, 7009

29 January 2025

Achint Jain
Project Leader
Australian Energy Market Commission
Achint.Jain@aemc.gov.au

Dear Mr Jain,

Re: Improving the National Electricity Market (NEM) Access Standards – Package 1 Draft Determination

TasNetworks welcomes the opportunity to provide a submission to the Australian Energy Market Commission (**AEMC**) regarding the Improving the NEM Access Standards Rule Change. As the transmission and distribution network service provider (**NSP**) in Tasmania, TasNetworks is responsible for the operation and maintenance of the electricity networks. This role involves extensive assessment of network capability and impacts caused by new connection applications from generation and load customers.

TasNetworks recognises the significant amount of consultation undertaken during AEMO's review of technical requirements for connection and supports the AEMC's decision to fast-track this rule change request.

The existing connection framework determined in Chapter 5 of the National Electricity Rule's (**NER**) could be improved upon for NSPs and connecting customers. Refinement to the Minimum and Automatic Access Standards may reduce the extent to which negotiation must occur for a range of technical requirements. However, it is crucial that an appropriate balance is struck between simplicity of the connection process and the robustness of analysis undertaken to ensure the safe and efficient long-term operation of the electricity network.

TasNetworks is supportive of most of the changes proposed in the draft rule change. However, we wish to provide feedback regarding the proposed change to *relax the continuous uninterrupted operation requirement for fault level below minimum for which the plant is tuned.*

The draft rule requires NSP's to specify the minimum fault level for tuning to be the higher of:

- the three-phase fault level derived from the short circuit ratio recorded for clause S5.2.5.15, and

Tasmanian Networks Pty Ltd
ABN 24 167 357 299
PO Box 606, Moonah, TAS, 7009

- the minimum fault level at the electrically closest system strength node combined with the single network element outage that would most reduce the fault level at the connection point.

The proposed requirements to determine the fault level may result in tuning to a value that is less optimal for the long-term operation of the system. It also does not take into consideration the connection of existing and future plant that may be sharing the system strength at that location. Additionally, the electrically closest system strength node may be a electrically distant from the connection point – and therefore the fault level at the nearest node may not be appropriate to use. TasNetworks suggests minimum fault levels should be able to be negotiated between NSPs and connecting parties. This would provide the ability to tune connecting assets to a fault level optimised for the network at the connection point.

The inclusion of a third option that the minimum fault level can be negotiated based on actual fault level and capability of the existing plant would improve the flexibility of this technical requirement and result in better management of fault level requirements across the network moving forwards.

If you have any questions regarding this letter, please contact Sam Riewoldt, Senior Regulatory Analyst sam.riewoldt@tasnetworks.com.au

Yours sincerely

Chantal Hopwood
Head of Regulation