



Dr Achint Jain
Senior Adviser & Project Leader
Australian Energy Market Commission

Lodged online: <https://www.aemc.gov.au>

30 January 2025

Dear Dr Jain,

Improving the National Electricity Market access standards (Package 1) – Draft determination

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) draft determination for improving National Electricity Market (NEM) access standards.

Origin supports the proposed amendments to the NEM access standards in Chapter 5 of the National Electricity Rules (NER), which aim to enhance power system performance, streamline the connections process, bolster system resilience, and support efficient investment. We do, however, outline some recommendations below that would further improve the efficiency of the framework.

Clause S5.2.5.10 – Detection and response to unstable operation

Proposed amendments to clause S5.2.5.10 introduce new requirements for instability detection and response that generators will have to comply with. To enhance power system security and prevent unnecessary generation unit disconnections, greater prescription is needed for implementing and testing protection systems to meet S5.2.5.10 requirements. This would help ensure consistent application by transmission network service providers (TNSPs) across jurisdictions and the Australian Energy Market Operator (AEMO), supporting effective outcomes.

Additionally, instability detection devices and processes should be used solely for monitoring by AEMO, rather than for automatically disconnecting plant, as this could cause equipment damage. Plant disconnections should be coordinated between AEMO, the connecting TNSP and plant operators in response to instability issues, allowing generators to follow safe shutdown procedures.

If you wish to discuss any aspect of this submission further, please contact me at megan.findlay@originenergy.com.au.

Yours faithfully,



Shaun Cole
Group Manager, Regulatory Policy