6 February 2025

Australian Energy Market Commission

By email: submissions@aemc.gov.au

Dear Sir/ Madam

Re: Technical Access Standards Review schedule 5.2 and 5.3a – ElectraNet Comments

ElectraNet welcomes the opportunity to comment on the 2024 rule change draft around the technical standards for schedule 5.2 and 5.3a.

ElectraNet shares AEMO's view on the timeliness for AEMO to review technical requirements for connection to ensure they are fit for purpose as we see the rapid and ongoing changes to the NEM power system. However, ElectraNet has continuing reservations about progressing a number of the proposed rule drafting changes via the fast-tracked process due to potential impacts perceived to the connections process, impacting costs and timing that have not had suitable due diligence or impact assessment.

Comments

Inclusion of Synchronous Condensers in S5.2

In line with our previous comments (ElectraNet submission 30 August 2023) ElectraNet has obligations under the regulatory framework to comply with the technical requirements defined in NER S5.1 as a Network Service Provider (NSP). Devices such as Synchronous Condensers that are installed, owned and operated by NSP are the outcomes of regulated projects, which are undertaken with various drivers, including addressing system strength requirements.

It is acknowledged that NER S5.2 sets out the technical requirements for Generators and Integrated Resource Providers, it is appropriate that the inclusion of synchronous Condensers in S5.2 be only applied to individual market participant for the purpose of access standard negotiation and registration of the plant in the NEM.

ElectraNet agrees that there are benefits to defining technical performance obligations for synchronous condensers and therefore welcomes the approach of assessing technical

requirements in ensuring compliance with NER S5.1 but do not believe this need to be applied via the 5.2 process, sighting impacts to resources, increased delays in generator performance assessments and increased cost to those regulated project to meet system strength and security needs.

Proposed changes to S5.2.5.1

The access standard for S5.2.5.1 should be assessed on a case-by-case basis and network needs to determine efficient and sufficient levels of reactive power support. ElectraNet therefore is of the view that the current Automatic Access Standard should remain and that the introduction of a voltage dependent reactive power curve be considered in the negotiated access standard if appropriate.

Proposed changes to S5.2.5.13 (d)(2) and (d)(4) – simplifying standards for small connections

ElectraNet appreciates that simplifying standards for small connections would facilitate access standard assessment and negotiation for generating system of less than 30 MW, increased volume of connections of this size would create operational challenges, in particular voltage control and reactive power coordination in the system. ElectraNet is therefore not supportive of the proposed changes in the interest of power system security in the long run.

Proposed changes to S5.2.5.10 – PMU with access to phasor measurement for generating system > 100 MW

While ElectraNet supports the additional requirement for phasor measurement unit for larger system, the requirements under S5.2.5.10(3)(ii) needs to be further clarified, specifically: the information to be received by generators, and what actions are required if NSP is to be involved.

ElectraNet appreciates the opportunity to provide feedback on the draft 2024 AEMO review of technical requirements for connection. Should you have any queries, please contact Lucas Millmore in the first instance on (08) 8404 7255.

Manager Network Connections