Investigation into system strength frameworks in the NEM

stakeholder SUBMISSION template

The template below has been developed to enable stakeholders to provide their feedback on specific questions that the Commission is interested in due to the discussion paper. It is designed to assist stakeholders provide valuable input on those questions the Commission is interested in. However, it is not meant to restrict any other issues that strakeholders would like to provide feedback on.

SUBMITTER DETAILS

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| **ORGANISATION:** | |  |
| **CONTACT** | **NAME:** |  |
| **EMAIL:** |  |
| **PHONE:** |  |

**CHAPTER 2** – key issues with the current system strength frameworks

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| **Section 2.3 – Key issues of the minimum system strength framework** | |
| 1. Do stakeholders agree with the AEMC’s assessment of the issues of the minimum system strength framework? |  |
| 1. Have stakeholders identified any other significant issues as a result of the minimum system strength framework? |  |
| **Section 2.4 – Key issues of the “do no harm” framework** | |
| 1. Do stakeholders agree with this assessment of the issues of "do no harm" framework? |  |
| 1. Have stakeholders identified any other significant issues as a result of the "do no harm" framework? |  |
| **Section 2.7 – Conclusion** | |
| 1. What are stakeholders views on the Commission's proposal to consider evolving the framework to a more integrated approach for system strength in the NEM? |  |

**CHAPTER 3** – Considerations for provision of system strength

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| **Section 3.1 - What is system strength?** | |
| 1. Do stakeholders agree with the Commission’s characterisation of system strength? |  |
| 1. Has the Commission set out all the necessary considerations for defining a system strength service? If not, what additional considerations could be included? |  |
| 1. Do stakeholders consider the regulatory definition of system strength should be updated/changed? If not, why not? If so, how could this be done? |  |
| 1. Do stakeholders consider that the system strength definition should recognise active and passive system strength procurement? If not, why not? If so, how could this be done? |  |
| 1. Do stakeholders agree that clarifying the NER system strength service definition is likely to contribute to more/broader options for the system strength provision? |  |
| 1. Are there any additional sources of fault current in the NEM that can contribute to meeting system strength needs? |  |
| 1. Are there any other technologies in the NEM that can contribute to meeting system strength needs that should be consideredi? |  |
| **Section 3.2 - Why is system strength needed?** | |
| 1. Do stakeholders agree with why system strength is needed? |  |
| 1. Are there any additional reasons for why system strength is needed in a power system? |  |
| 1. Do stakeholders agree with the characterisation of the impact of inverter-based generation on system strength? |  |
| 1. Are there any additional impacts on system strength that should be taken into account? |  |
| **Section 3.3 - The provision of system strength in the NEM** | |
| 1. Do stakeholders agree that with the characterisation of system strength thresholds? |  |
| 1. Are there any additional thresholds or alternative characterisations that might be included in the investigation? |  |
| **Section 3.4 - The provision of system strength in the NEM** | |
| 1. Do stakeholders agree with the system strength attributes? |  |
| 1. Are there any additional attributes of system strength that the Commission should be aware of? |  |

**CHAPTER 4** – Evolving system strength frameworks

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| **Section 4.1 - Approach to developing a new framework** | |
| 1. Do stakeholders agree with approach (Plan, Procure, Price, Pay) to developing a new framework for system strength? Are there additional steps/concepts that should be explored? |  |
| **Section 4.2 - Models for delivering system strength** | |
| 1. Do stakeholders agree with the summary of the potential capabilities of each system strength model in Table 4.1? |  |
| **Section 4.3 - Model 1: Centrally Coordinated** | |
| 1. Do stakeholders agree with the characterisation and assessment of a centrally coordinated model? Are there any other advantages and/or challenges? |  |
| **Section 4.4 - Model 2: Market based decentralised** | |
| 1. Do stakeholders agree with the characterisation and assessment of a market based decentralised model? Are there any other advantages and/or challenges? |  |
| **Section 4.5 - Model 3: Mandatroy service provision** | |
| 1. Do stakeholders agree with the characterisation and assessment of a mandatory service provision model? Are there any other advantages and/or challenges? |  |
| **Section 4.6 - Model 4: Access standard** | |
| 1. Do stakeholders agree with the characterisation and assessment of an access standard model? Are there any other advantages and/or challenges? |  |
| **Chapter 4 - General** | |
| 1. Are there other model(s) stakeholders think should be explored? |  |
| 1. What combiantions of models (i.e. hybrids) should be explored further? |  |
| 1. Do stakeholders have any suggestions as to how any/all the models set out could be implemented or modified? Please comment on any and all models possible. |  |

**CHAPTER 5** – System strength in distribution Networks

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| 1. What factors make system strength provision in distribution networks unique from transmission networks? |  |
| 1. What are the key issues for system strength in distribution networks, including the magnitude and urgency of system strength issues in distribution networks? |  |
| 1. How should any system strength issues in distribution networks be addressed? Are any model(s) from Chapter 4 appropriate to address system strength provision in distribution networks? |  |