

4 April 2018

By email: SystemStrengthGuidelines@aemo.com.au

re: Submission in response to Notice of First Stage of Rules Consultation: System Strength Impact Assessment Guidelines

ElectraNet welcomes the opportunity to provide this submission to the System Strength Impact Assessment Guidelines (referred to as the Guidelines in this submission) public consultation.

Generally, ElectraNet supports the Guidelines, and it is noted that, while drafting the Guidelines, AEMO sought input from the Power System Modelling Reference Group which includes ElectraNet representation. Notwithstanding this, ElectraNet wishes to provide the following comments for consideration under the consultation process.

Threshold for inclusion of other generator proposals

Under Section 4 of the Guidelines, System Strength Impact Assessment Process, it is stated that NSPs must take into account *all proposed generating units or generating systems or proposed market network service facilities where an application to connect has been submitted*. ElectraNet submits that this requirement is a notable shift from that published under the Interim Guidelines and considers that this presents a threshold that is too low with respect to which prospective projects must be included when conducting impact assessments.

While the Guidelines require that such projects must have submitted proposed performance standards, it is noted that there are no requirements specified as to the validity or acceptability of these proposed performance standards. ElectraNet considers that it is more appropriate that a project achieve at least a provisional committed status, as defined by acceptance of proposed Generator Performance Standards by the NSP and AEMO, and for a Connection Agreement to be in place with the local NSP, before it is required to be included in the assumed projects for impact assessments of other newly proposed generators. It is also noted that the availability of a site specific and vendor specific EMT model is a key requirement to enable Full Impact Assessments to take into account any particular generator proposal.

Establishment of a register of included projects

To enable NSPs to conduct the required system strength impact assessments for proposed non-synchronous generation projects, records of projects to be included in these studies must be maintained to ensure that the assumptions feeding these studies are appropriate. Given the high level of activity on generation connection projects currently in the NEM and the importance of maintaining the sequence at which projects are required to be considered in impact assessments for other proposals, the importance of such information cannot be overstated. This information would also be highly useful to proponents in considering the relative complexity of a particular region for further non-synchronous generation development.

Given the numerous interfaces between NSPs and the potential for projects to cause adverse system impacts across NEM jurisdictional borders, we consider that a single register should be maintained. It would be more efficient for a single organisation to maintain such a register instead of the alternative where all NSPs would be required to develop new processes and coordinate and maintain their own records. We note that the NER already requires NSPs to advise AEMO when a project achieves committed status and, in its role in managing the OPDMS and providing models and information to participants for committed projects, AEMO already performs a similar role. Therefore, it is considered that there would be minimal additional activities required for AEMO to maintain such a single register. While noting that this does not detract from NSPs' obligations to conduct joint planning, ElectraNet submit that a register should be created that lists projects required to be included in system strength impact assessments and that AEMO would be in the best position to maintain such a register.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'H. Klingenberg', written in a cursive style.

Hugo Klingenberg
Senior Manager Network Development