



BayWa r.e. Projects Australia Pty Ltd

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To whom it may concern,

Subject: SSAIG Minor amendment - Calculating system strength quantities in the NEM

BayWa r.e Projects Australia Pty Ltd (BayWa) welcomes the opportunity to comment on AEMO's proposed minor amendment to the System Strength Impact Assessment Guidelines (SSIAG) published on 11 May 2023.

BayWa is a global renewable energy development company active in 30 countries. In Australia we own and operate grid connected generators totalling 180MW in the National Electricity Market (NEM) and have a development pipeline of more than 5GW throughout New South Wales, Queensland and Victoria.

BayWa acknowledges the extensive work done on coordinating the system strength requirement in the NEM and we support AEMO's proposed amendment. In our view, the amendment more accurately reflects the amount of system strength that a project would need to procure to ensure stable network operation with addition of new generators. Specifically, BayWa agrees that applying the SSQ formula in the NER, without adjustment, could significantly overstate the quantity of system strength required to support each connection. This may result in a situation where connecting parties are over-charged for more system strength than is technically required to be procured. In our view this would result in unfair liability and increased risk for new projects connecting to the NEM.

We welcome the opportunity to provide further input or advice on this matter.

Yours sincerely,

Matt Clifton-Smith

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