

## 1. Comments: System Strength Impact Assessment Guidelines

Section	Energex and Ergon Energy Comments
General	<p>Energex and Ergon Energy recommend that a review of the Guidelines should be undertaken by AEMO twelve months after commencement to ensure they are fit-for-purpose and to address any issues identified by AEMO, Network Service Providers (NSPs) and Proponents in their application.</p> <hr/> <p>Energex and Ergon Energy recommend that consideration is given to transitional arrangements for existing projects that are already significantly progressed as at commencement of the new Guidelines.</p> <hr/> <p>It remains unclear from the Guidelines as to how a proponent will tune their plant adequately before the NSP completes a Full Impact Assessment. Experience in Queensland has shown that considering another generator's plant can have a major impact on an Applicant's tuning. Energex and Ergon Energy are therefore of the view that it would be inefficient for a Proponent to wait until an issue emerges in the Full Impact Assessment before requesting the full models to refine their tuning.</p> <p>Consequently, Energex and Ergon Energy suggest that Proponents should have the ability to negotiate the provision of models prior to the NSP undertaking a Full Impact Assessment (particularly in scenarios where the NSP and Proponent are of the opinion that interactions are likely).</p>
1.2.1	<p>Energex and Ergon Energy recommend that the definition of "committed" in Table 1 should be further as follows:</p> <p style="padding-left: 40px;">"In respect of an Applicant's proposed connection:</p> <ul style="list-style-type: none"> <li>• AEMO has issued a letter to the connecting NSP under clause 5.3.4A of the NER indicating that AEMO is satisfied that each specified access standard meets the requirements applicable to a negotiated access standard under the NER; and</li> <li>• AEMO and the connecting NSP have accepted that a detailed PSCAD™/EMTDC™ model provided by or on behalf of the Applicant representing the Applicant's proposed connection meets the requirements of the Power System Model Guidelines.</li> <li>• <u>The Applicant has signed an Offer for Connection with the connecting NSP.</u></li> </ul> <p style="padding-left: 40px;">In respect of another proposed connection:</p> <ul style="list-style-type: none"> <li>• AEMO has issued a letter to the connecting NSP under clause 5.3.4A of the NER indicating that AEMO is satisfied that each specified access standard meets the requirements applicable to a negotiated access standard under the NER;</li> </ul>

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	<ul style="list-style-type: none"> <li>• AEMO and the connecting NSP for that other proposed connection have accepted a detailed PSCAD™/EMTDC™ model provided by or on behalf of the Connection Applicant of that proposed connection meets the requirements of the Power System Model Guidelines;</li> <li>• any proposed system strength remediation schemes or system strength connection works in respect of that other proposed connection have been agreed between the relevant parties, or determined by a dispute resolution panel; and</li> <li>• there is no reasonable basis to conclude that the model previously provided is materially inaccurate, including following commissioning of the connection.</li> <li>• <u>the proposed system has a signed Offer for Connection with the connecting NSP.</u>”</li> </ul>
2.4.1	<p>It is recommended that the following obligation should be included:</p> <p>“The Applicant is required to undertake and provide all simulations and studies necessary to enable the NSP to assess whether their connecting generator will ‘do no harm’ and can operate within stability limits.”</p>
4.1.5(d)	<p>Energex and Ergon Energy recommend that section 4.1.5(d) should be deleted.</p> <p>This amendment is necessary due to the fact that detailed information required to undertake an assessment of adequacy may not be known or available at the Preliminary Assessment stage.</p>

## 2. Comments: Power System Model Guidelines

Section	Energex and Ergon Energy Comments
General	<p>Energex and Ergon Energy recommend that a review of the Guidelines should be undertaken by AEMO twelve months after commencement to ensure they are fit-for-purpose and to address any issues identified by Network Service Providers (NSPs) and Proponents in their application.</p> <hr/> <p>Energex and Ergon Energy recommend that consideration is given to transitional arrangements for existing projects that are already significantly progressed as at commencement of the new Guidelines.</p>
1.2.1	<p>Energex and Ergon Energy recommend that the definition of “committed” in Table 1 should be further as follows:</p> <p>“In respect of an Applicant’s proposed connection:</p> <ul style="list-style-type: none"> <li>• AEMO has issued a letter to the connecting NSP under clause 5.3.4A of the NER indicating that AEMO is satisfied that each specified access standard meets the requirements applicable to a negotiated access standard under the NER; and</li> <li>• AEMO and the connecting NSP have accepted that a detailed PSCAD™/EMTDC™ model provided by or on behalf of the Applicant representing the Applicant’s proposed connection meets the requirements of the Power System Model Guidelines.</li> <li>• <u>The Applicant has signed an Offer for Connection with the connecting NSP.</u></li> </ul> <p>In respect of another proposed connection:</p> <ul style="list-style-type: none"> <li>• AEMO has issued a letter to the connecting NSP under clause 5.3.4A of the NER indicating that AEMO is satisfied that each specified access standard meets the requirements applicable to a negotiated access standard under the NER;</li> <li>• AEMO and the connecting NSP for that other proposed connection have accepted a detailed PSCAD™/EMTDC™ model provided by or on behalf of the Connection Applicant of that proposed connection meets the requirements of the Power System Model Guidelines;</li> <li>• any proposed system strength remediation schemes or system strength connection works in respect of that other proposed connection have been agreed between the relevant parties, or determined by a dispute resolution panel; and</li> <li>• there is no reasonable basis to conclude that the model previously provided is materially inaccurate, including following commissioning of the connection.</li> </ul>

Section	Energex and Ergon Energy Comments
	<ul style="list-style-type: none"> <li>• <u>the proposed system has a signed Offer for Connection with the connecting NSP.</u></li> </ul>
2.1, 2.2, 2.3 and 2.4	The tables provided in these sections need to be amended to include provision of model data to be requested by NSPs.
7.4.1	<p>Section 7.4.1 is unclear. Further clarification is required as to whether AEMO and the NSP can share models with proponents.</p> <p>In addition, Table 6 references sections 7.3.2, 7.3.3 and 7.3.4, but it is unclear in which document these sections are located.</p>