

20 April 2023

Australian Energy Market Operator  
Level 22  
530 Collins Street  
Melbourne VIC 3000

Via email: [contact.connections@aemo.com.au](mailto:contact.connections@aemo.com.au)

AEMO Connections team,

**Feedback on AEMO review of technical requirements for connection (NER clause 5.2.6A)**

We refer to the published document “Draft report - AEMO review of technical requirements for connection under Schedules 5.2, 5.3 and 5.3a of the National Electricity Rules” on AEMO’s consultation page<sup>1</sup> and the invitation to provide feedback.

Founded in 2012, Total Eren is the dedicated renewable energy subsidiary of EREN Groupe. Total Eren is an Independent Power Producer (IPP), which develops, finances, invests in, builds and operates renewable energy power plants worldwide for the long-term. Since December 2017, TotalEnergies, a key player in the energy sector, has been a shareholder of Total Eren.

Total Eren Australia developed and now operate the 200 MW Kiamal Solar Farm and 190 MVA Kiamal synchronous condenser located in north-west Victoria. Since 2021, we have been actively developing multiple large scale solar farms either combined with AC or DC-coupled storage. These developments represent close to 2 billion dollars of investment with a target construction commencement date in 2023 to 2025.

We welcome AEMO’s review of technical requirements for connection, which address some long-standing concerns. Broadly, Total Eren considers these modifications as a significant improvement. We also acknowledge that there is further work to be done regarding certain clauses but believe that the more complex discussions should not delay the implementation of non-contentious improvements.

We believe the current assessment practices and interpretation of S5.2.5.1 and S5.2.5.4 result in an inefficient outcome for new connecting renewable generators or established generators going through a 5.3.9 process. In our experience, the connecting Network Service Provider (NSP) is rarely willing to agree to negotiate a standard for S5.2.5.1, even when

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<sup>1</sup> <https://aemo.com.au/consultations/current-and-closed-consultations/aemo-review-of-technical-requirements-for-connection>

a conservative solar farm design is proposed (including a significant amount of apparent power headroom, even as high as 20% more MVA capacity than MW). The proposal presented by AEMO to amend the automatic access standard and remove unrealistic operating conditions from the assessment is welcomed by Total Eren.

Similarly, we view the proposals to amend S5.2.5.2, S5.2.5.7 and S5.2.5.13, as relatively non-contentious and could be progressed quickly as incremental Rule changes. However, we understand a longer consultation may be required for more complex clauses (e.g. S5.2.5.5, S5.2.5.8 and S5.2.5.10). Total Eren wishes to see continued momentum and incremental improvements to the connection process and we would be happy to meet with AEMO to offer our experience and views.

If you have any questions on this submission, please feel free to contact either Trevor Lim on 0432 848 768 / [trevor.lim@total-eren.com](mailto:trevor.lim@total-eren.com) or Fabian Spescha on 0403 017 018 / [fabian.spescha@total-eren.com](mailto:fabian.spescha@total-eren.com)

Yours sincerely,

A handwritten signature in black ink, appearing to be "F. Spescha".

Fabian Spescha  
Grid Connection Manager, Markets & Grid

**Submitted on behalf of Total Eren Australia Pty Ltd**