

19 August 2022



Part of Energy Queensland

Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Submitted via email to planning@aemo.com.au

Dear Mr Westerman

System Strength Requirements Methodology and Power System Stability Guidelines amendments consultation

Ergon Energy Corporation Limited (Ergon Energy) and Energex Limited (Energex) welcome the opportunity to provide comments to the Australian Energy Market Operator (AEMO) on its Draft Report and Determination for amendments to the System Strength Requirements Methodology and System Strength Impact Assessment Guidelines.

Ergon Energy and Energex recognise the importance of this work to achieve a more holistic view of managing system strength across the electricity network. Given system strength is highly locational, we consider that close joint workings and ongoing collaboration is essential. We also consider that evaluation of the requirements and impacts of small-scale distributed generation is a key area of future work as these inverter-based resources are exposed to changes in historical system strength levels.

Ergon Energy and Energex look forward to the release of the updated System Strength Impact Assessment Guidelines (SSIAG) so that we can efficiently prepare for implementation of the *National Electricity Amendment (Efficient management of system strength on the power system) Rule 2021 No. 11* on 1 December 2022 and 15 March 2023. We would appreciate advice on the expected dates for publication for the SSIAG as we expect a number of proponents currently progressing through the Enquiry stage may be affected by the implementation date in 2023.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact me on 0438 021 254 or Peter Wall on 0436 423 112.

Yours sincerely

A handwritten signature in black ink that reads 'C. G. Martin'.

Charmain Martin
Acting Manager Regulation

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