

1 October 2021

Ms Victoria Mollard
Executive General Manager
Australian Energy Market Commission
PO Box A2449
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By email submission

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Dear Ms Mollard

Efficient Management of System Strength on the Power System Rule – Timeframes for Annual System Strength Assessment Report

AEMO has reviewed the Draft Rule Determination implementation and ongoing delivery dates for the new system strength framework. AEMO requests that the first (and all subsequent) system strength reports be published by 1 December each year.

This is necessary due to the sequential set of data inputs and power system analysis, that is needed to perform the 5-year system strength assessment and produce the annual system strength report. The inputs and analysis needed for the system strength assessment and report are derived from the following:

- Latest demand forecasts (in particular, minimum demand projections, which are highly relevant for system strength assessments as they influence projected future operation of synchronous generation);
- ISP projections of future inverter-based resource developments, and including network augmentations that are expected to complete in the 5-year outlook period (as network augmentations can improve system strength); and
- Detailed time sequential modelling from the ISP, updated for latest demand forecasts as needed, as this determines projections of future minimum numbers of synchronous generation which is relevant to system strength assessments.

Typically, these processes only are able to provide sufficiently robust information by the end of October. The requisite system strength analysis then takes these inputs and includes detailed power system and EMT modelling, which is undertaken in November. The outcomes are then presented in AEMO's system strength report. Hence AEMO requests that the Final Rule is amended so that the first (and all subsequent) system strength reports are required to be published by 1 December each year.

Should you have any questions, please contact Samantha Christie, Manager Network Planning at Samantha.christie@aemo.com.au

Yours sincerely



Kevin Ly

Group Manager - Regulation