19th June 2025

Project Lead
Australian Energy Market Commission (AEMC)
Level 15/60 Castlereagh St, Sydney NSW 2000

Re: Improving the NEM access standards – Package 2 (ERC0394) – Response to consultation paper

To whom it may concern,

gridmo welcomes the opportunity to provide comments on the Commission's consultation paper for *Improving the NEM access standards – Package 2* (ERC0394).

gridmo is a software platform that provides engineers with access to fast and accurate power system studies. Our software platform is actively supporting over 30 GW of generation projects throughout the world.

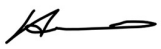
As part of our platform, we also provide standardised templates to help accelerate the connection of renewable energy to the grid – such as our AEMO GPS template available at: https://docs.gridmo.io/docs/templates/au_aemo_gps/.

We commend the efforts of the Commission, AEMO and the wider industry on the work completed to revise the Rules, so the NER can continue to evolve to meet the needs of the rapidly changing Australian electricity network.

Please refer overleaf for our comments on the consultation paper.

Our comments reflect our opinion on the proposed rule change, specifically only those regarding power systems modelling.

Yours sincerely,



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1. S5.3.3(c) | Box 3 | Question 8.2 requiring a load to maximise ride-through capability goes against the NER's access standard framework

We note that AEMO and the Commission is proposing that new large loads are now required to:

"...maximise the *schedule 5.3 plant's* capability to remain in operation for abnormal *power system* conditions for which the *plant* is not required to *disconnect* under any *performance standard*, while maintaining safe and stable operation of the *plant* within safety margins consistent with *good electricity industry practice*."

This means even if a large load is fully compliant with the Automatic Access Standard of this clause, the reviewing party can commence negotiations of not enough capability being offered or require further verification if the load could offer more capability. It also brings into question the ability for a load to disconnect from the network if they believe the network is unstable and may impact their business operations.

We believe this requirement could lead to unnecessary additional negotiation and slow down the connection process.

We believe that if additional capability is necessary, it should be clearly stated and included in the automatic access standard – not up to subjective negotiation.

2. S5.2.5.5 | Question 11 – we acknowledge the issue, but we're unclear on the amendment's intention

We acknowledge that clauses 4.2.3A(g) and S5.2.5.1(c)(1) could be interpreted as to require a generating system to ride through any possible network fault - if AEMO has reclassified the event as credible. However, this interpretation could be very difficult to enforce as no generator can offer unbounded fault ride-through performance.

We are unclear on the intention of this proposed amendment. We believe there are two mutually exclusive possible objectives:

Objective 1 – The rule change requester wants to remove the implied requirement for unbounded fault capability

If the rule change's intention is to remove the implied requirement for unbounded fault capability, this can be achieved by:

- Adding the proposed reference to S5.1.2.1 in S5.2.5.5(c)(1); and
- Not adding the proposed second requirement in S5.2.5.5(c)(1) regarding non-credible contingencies.

We support this objective and the changes referenced above. It aligns the faults a connecting generator is investigating with the same suite of faults the reviewing NSP uses for their own network planning activities. This in turn will help streamline the grid connection process, in line with the NEO.

Objective 2 – The rule change proponent wants to force a generator to ride-through a subset of non-credible contingencies

If the rule change proponent's intention is to force a generator to ride-through a non-credible contingency event that has been reclassified (which appears to be the intention of the new requirement), we query:

1. How the Commission expects to capture in the generator's agreed performance standard what routinely reclassified non-credible contingencies the generator can and cannot ride through?
2. How the Commission expects a generator to comply with a new routinely re-classified non-contingency event that didn't exist (or wasn't routinely re-classified) when the generator's agreed performance standard was implemented?
3. How the Commission expects, with regards to a future generator which must meet this requirement:
    a. How is that generator notified of an event that meets the definition of "routinely reclassified"? Is this via the existing AEMO market notices or some new system?
    b. Who completes power system modelling to identify that generator's capability to ride-through a reclassified event after re-classification?
    c. If that generator does not ride-through this new event, is this considered a trigger for a 5.3.9 amendment?

We do not support this proposed new requirement.

We disagree with the Commission's opinion that it will "*improve the transparency of what constitutes credible contingency in relation to the disturbance ride-through capability requirement for schedule 5.2 plant*" [1].

The proposed new clause is highly subjective ("*reasonably anticipated*", "*routinely expected*" and "*likely to cause*") and we believe it does not clarify the obligations for generators.

3. S5.2.6A | Question 13.4 – the proposed rule does not cap the time extension

The proposed amendment does not cap the additional time of the extension and could be used several times for arbitrary extensions. We acknowledge the pace of grid connection requirements in Australia, but question if changing from 12 months to 18 months, including a reference to publish "as soon as practicable" could be a more practical way to incentivise acceleration of the energy transition?

[1] ERC0394 Consultation Paper, page 48