



19 June 2025

Australian Energy Market Commission (AEMC)

Via AEMC website: www.aemc.gov.au

Improving the NEM Access Standards - Package 2

Alinta Energy welcomes the opportunity to provide feedback on the proposed changes towards improving the NEM access standards.

Alinta Energy is broadly supportive of the three rule change requests proposed by the Australian Energy Market Operator (AEMO) and Rod Hughes Consulting; however, we would like to make the following recommendations for the AEMC's consideration.

System strength

We are supportive of the proposed measures to allow HVDC links to procure system strength from third parties and consider this will ultimately lead to competitive and efficient remediation services for these assets.¹

Noting this, we have concerns regarding unintended consequences that may arise from limiting short circuit ratio requirements for customer loads to inverter based resources (IBRs) and the proposed introduction of flexibility to the access standard.² We recommend that the AEMC consider whether large inverter-based loads (IBLs) should be required to either: self-remediate, engage third parties for system strength services, or pay the system strength remediation charge – rather than be granted flexibility in short circuit ratio requirements. This could support consistency with the treatment of large IBRs under the current rules and avoid the potential impact of consumers or generators incurring costs to remediate this.

Clarification of credible contingency definition for disturbance ride through

We are supportive of the proposal³ to amend the NER to clarify the types of contingency events that a schedule 5.2 plant must be able to ride through. Specification in the NER of what constitutes credible and non-credible contingency events will provide better guidance for establishing and complying with a performance standard.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please get in touch with Isidora Stefanovic at isidora.stefanovic@alintaenergy.com.au.

Yours sincerely,

Isidora Stefanovic
Regulatory Affairs Specialist

¹ Question 3 in the Consultation paper.

² Question 4 in the Consultation paper.

³ Question 11 in the Consultation paper.