

19 June 2025
ERC0394
Australian Energy Market Commission
Level 15
60 Castlereagh Street
Sydney NSW 2000

TE H2 – Response to Improving the NEM access standards – Package 2

TE H2 welcomes the opportunity to provide feedback on the consultation paper relating to the *National Electricity Amendment (Improving NEM access standards – Package 2) Rule 2025*.

TE H2 is a joint venture dedicated to the development and investment into multi-energy projects which are globally impactful in delivering more energy competitively with fewer emissions. The joint-venture is owned by:

1. **TotalEnergies** (80%): a global integrated energy company that produces and markets energies: oil and biofuels, natural gas and green gases, renewables and electricity. With over 100,000 employees TotalEnergies is active across 120 countries and is committed to provide as many people as possible with energy that is more reliable, more affordable and more sustainable – including existing fleet of 24 GW of renewable energy assets and commitment to achieve 100 TWh of electricity production by 2030; and
2. **Eren Groupe** (20%): a company dedicated to natural resources efficiency with investments across renewable energy and clean technologies.

In Australia, TotalEnergies has been present for over 60 years with investments across Gladstone LNG (operated by Santos) and Ichthys LNG (operated by INPEX) in Gladstone and Darwin region, respectively, a 256 MWp operating solar farm in Victoria and as energy storage systems provider through its subsidiary SAFT.

TE H2's long-term ambition to provide competitive dispatchable renewable energy and complementary green molecules to its industrial partners to achieve Net Zero with society by 2050.

Our responses below have only targeted the questions where we felt TE H2's input would be most useful. Our interest in this rule change relates to connecting new Hydrogen electrolyzers and data centres in the NEM.

Question 1: Defining large loads in the context of this rule change request

TE H2 are supportive of defining *large loads* in the NER. We expect this would provide greater clarity on the requirements for loads through the development process and what requirements there might be to connect and operate a large load in the NEM. We support the method propose by AEMO to use a 10% of maximum credible contingency size on the mainland or in Tasmania as a baseline for what is considered a large load (75 MW in the NEM and 14.4 MW in Tasmania). Drawing the line based on credible contingencies presents a method that is simple, can be applied consistently and is technology agnostic.

Question 2: Amending the NER to address the influx of large loads

TE H2 agree that the growth of large loads in an uncoordinated manner with generation considerations may present a risk to power system security. Continued growth in loads will place an increased emphasis on the construction of new transmission assets and other supporting infrastructure, such as system strength units. As we are seeing significant delays and cost increases to the development of new transmission, the development of new loads in certain locations such as regional hubs could be incentivised to provide system support and reduce the extreme minimum system loads that are becoming more prevalent in the NEM while creating more resilient transmission networks by having multiple hubs which balances generation and load outside of city centres.

Question 4: Limiting short circuit ratio requirements for customer loads to IBR, and introducing flexibility to the access standard

TE H2 believe that SCR requirements should apply to all load sizes, without exception. As generators are required to meet certain requirements, we encourage the same requirements be shared with large loads to ensure power system security which could ultimately assist in underwriting a more resilient solution to enhance power system security..

Question 7: Provision of information on ride-through capability

TE H2 supports the requirement of large loads to provide information on ride-through capability to the TNSPs. Without this information it makes it harder to operate the power system safely and efficiently. If loads can provide information to TNSPs regarding their capability to ride-through contingency events this may go some way to improve the signals received in spot market operation. We request that the information requested by TNSPs is transparent to prospective connections and is similar across state jurisdictions.

Question 8: Protection settings to maximise ride-through performance

We support the suggestion to foster greater cooperation between NSPs and network users to design protection systems and settings to maximise the ride-through performance of new loads. We encourage this collaboration to meet a set standard that is common across all new network loads.

Question 9: New access standard for detection and response to instability

TE H2 do not support the new access standard as set out in Box 4. Whilst the sector is developing at the moment the items proposed in Box 4 will likely create significant cost for new network connections and pose uncertainty for the path forward. Any proposed change to access standards should be clear and simple to implement.

Should you require any additional information please do not hesitate to contact me.

Sincerely,



Kam Ho
Managing Director
TE H2 Australia Pty Ltd