Ref. A5902975

1 July 2025

Mr Sebastien Henry
Director
Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2001

Dear Sebastien,

Ref ERC0402: Clarifying Registration for Non-Generating Units Providing System Security Services – Consultation Paper

Powerlink Queensland (Powerlink) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC's) Consultation Paper on Clarifying Registration for Non-Generating Units Providing System Security Services.

We understand the primary purpose of the proposed amendments to the National Electricity Rules (the Rules) is to fill a gap in the current Rules and establish an appropriate pathway for standalone synchronous condensers to register and participate in the National Electricity Market to provide essential system services, including for Transmission Network Service Providers (TNSPs).

Powerlink supports the overarching intent of this Rule change proposal to allow greater access to and opportunities for network support arrangements, particularly in the context of the overall energy transformation.

If these Rule changes could be finalised and implemented in a timely manner, such arrangements could facilitate and improve certainty for potential proponents to optimise and repurpose their energy infrastructure, including non-generating units, to be capable of delivering system security services. As a result, from a practical perspective, TNSPs could consider and access a broader suite of credible alternatives to network options that provide significant benefits for customers.

For these reasons, Powerlink encourages the AEMC to accommodate flexibility in the Rules to recognise the expanding range of emerging non-network solutions. This will promote competition, reduce costs and improve system security and grid reliability for customers.

If you have any questions in relation to this submission, please contact me at jenny.harris@powerlink.com.au.

Yours sincerely,

Signed by J Harris

Jennifer Harris
General Manager – Network Regulation