

03 July 2025

Australian Energy Market Commission (AEMC)

Via AEMC website: [www.aemc.gov.au](http://www.aemc.gov.au)

### Clarifying registration for non-generating units providing system security services

Alinta Energy welcomes the opportunity to provide feedback on the proposed changes towards clarifying registration arrangements for non-generating units, particularly standalone synchronous condensers, providing system security services.

#### **The proposed rule change addresses a substantive problem<sup>1</sup>**

We are supportive of CS Energy's proposal to ensure a non-generating system service providers are able to register to provide system security services.

We agree that by allowing repurposed synchronous generators as standalone synchronous condensers to register as NEM participants, this will result in a more efficient and cost-effective manner to provide system services, positively contributing to the NEO<sup>2</sup>.

Additionally, a clarification on this matter would serve to resolve the current ambiguity in the existing market registration categories, as defined in NER chapter 2.

#### **The solution to categorisation should be discrete and simple<sup>3</sup>**

We support an option that:

- Provides the least confusion for participants registering a non-generating unit;
- Does not create the impetus for further review of all registration categories (at this stage) and avoids significant consequential changes to the NER as far as practicable;
- Has the least cost or administrative impact on AEMO and to market participants.

Noting this, we believe Option 1, as proposed by CS Energy, best addresses the above.

In supporting Option 1, we would expect that: Participants providing system security services through generating units, including those with synchronous condenser mode, would continue to be registered as generators under existing NER definitions, as outlined in the CS Energy Proposal<sup>4</sup>.

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<sup>1</sup> Question 1 in the Consultation paper.

<sup>2</sup> Question 2 and 5 in the Consultation paper.

<sup>3</sup> Question 4 in the Consultation paper.

<sup>4</sup> 3.1 in the Consultation paper; CS Energy, rule change request, p.5.

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](mailto:isidora.stefanovic@alintaenergy.com.au).

Yours sincerely,

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