Tesla Motors Australia, Pty. Ltd.
546 Gardeners Rd
Alexandria NSW 2015

Rainer Korte
Reliability Panel Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

22nd January 2026

Dear Mr Korte,

RE: Tesla's Response to the Compliance Template Review 2026 Issues Paper

Tesla Motors Australia, Pty Ltd (Tesla) welcomes the opportunity to provide feedback to the Issues Paper for the Compliance Template Review 2026 (the Review).

The Review offers an opportunity to refresh the Template to be appropriate to the broadened range of plant types, technologies and technical access standards. Tesla's primary recommendation for the Review is that table 1 'Table to assist development of generator compliance programs' should be specified as two separate tables, with recommendations for demonstrating plant capability during a testing phase (such as Hold Point commissioning) separate from ongoing monitoring and compliance once a plant is operational.

Additionally, Tesla recommends that where possible, real time monitoring should be encouraged over routine testing for greater efficiency. For inverter-based resources such as BESS, whose settings are tuned once and then kept constant, there is no benefit from completing routine testing to validate the settings, such as for Reactive Power Capability, which is recommended to be tested every three years (in addition to after changes), especially as this can be validated through evaluating availability from real time monitoring. Further test-specific recommendations include:

'Response to Voltage Disturbances'	Remove test to avoid duplication, as the outcomes of this are already proven through the 'Voltage and Reactive Power Control System' test.
'Protection from Power System Disturbances' Method 3	Remove annual verification of the database registered protection settings.
'Protection Systems that Impact on Power System Security'	Increase frequency of testing for circuit breaker opening times to be the sooner of either every five years or after a certain number of opening times (in addition to after a relevant plant change). This is due to the number of times that the circuit breaker has operated having impacts on its mechanical integrity.
'Frequency Control and/or Governor Stability' Method 4	Remove the suggested frequency of testing for the governor or other control years to be every four years and keep for only after relevant plant changes.

Other considerations for the Review could include greater consideration for how Hardware-in-the-Loop testing may be able to facilitate Compliance programs. Tesla also welcomes clarification on what specifically would be required if a plant is requested to share evidence of monitoring after

an event. Tesla's preference would be that sharing the relevant raw data, such as from an Elspec meter as being sufficient, rather than the plant being required to produce a full report.

Although not detailed in this consultation response, Tesla looks forward to sharing feedback for designing appropriate monitoring approaches for new access standard requirements for short circuit ratio and voltage phase angle shift in the technical workshop and subsequent engagement opportunities.

Tesla welcomes continued engagement with the Panel and actively participating in ongoing discussions on the amending the Template.

Kind regards,

Tesla Energy Policy Team
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