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22 January 2026

Reliability Panel

Australian Energy Market Commission

Level 15, 60 Castlereagh Street

Sydney NSW 2000

Submission on AEMC's Compliance Template Review 2026

TotalEnergies Renewables Australia welcomes the opportunity to provide this submission to the Reliability Panel's review of the Template for Compliance Programs. TotalEnergies Renewables Australia is a subsidiary of TotalEnergies. TotalEnergies is a major multi-energy company, operating in more than 130 countries. TotalEnergies has more than 105,000 employees and covers all renewables technologies, all major regions (Americas, Europe, Asia, Africa) and all stages (development, construction, operation, and maintenance). From 300 MW of installed operational renewable capacity in 2017, TotalEnergies has now more than 10 GW of operational renewable assets. TotalEnergies' ambition is to be one of the world's top 5 renewable energy players by 2030 by reaching 100 GW gross capacity.

TotalEnergies Renewables Australia operates the 200 MW Kiamal Solar Farm and 190 MVA Kiamal synchronous condenser located near Ouyen, Victoria, with a further 2GW of projects in the development pipeline across both solar, storage and wind.

Question 1: Effectiveness of the Template in providing guidance for compliance programs What are stakeholders' experiences of using the Template? Does the current Template provide useful guidance to help parties with their obligations under the NER? What opportunities are there to improve the Template to provide better guidance in relation to compliance with NER technical performance standards?

> For the Kiamal Solar Farm and Synchronous Condenser we used the existing template to create our own monitoring program. Practically, it would have been more efficient to have the template in a readily editable format (e.g. Word or Excel) rather than pdf format. However, for the creation of a program and a general understanding of our obligations, it was very useful. We have also engaged a third party contractor to further develop and administer our compliance monitoring program.
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> We note that the existing Template is not overly prescriptive and we support this existing principle as it allows operators more flexibility in managing their compliance.

Question 2: Proposed assessment principles and rationale Do you agree with the proposed high level assessment criteria? Are there additional criteria the Panel should consider or criteria included here that are not relevant?

We feel that the Template does not need to be largely re-written. The existing methods for compliance demonstration appear to be comprehensive for synchronous generation but could be improved for inverter-based generation. This is somewhat to be expected given the historic dominance of synchronous generation. However, as there are now more inverter-based generators than synchronous generators the template should evolve accordingly. Additionally, as inverter-based generators are newer, the operators are typically less experienced and operating procedures are less well established.

Therefore, we suggest that the 2026 review of the template should focus on what has changed in the generation fleet since 2019 in addition to those three criteria.

Question 3: Proposed revised compliance principles Do you agree with the revised compliance principles? Are there any key concepts that are not currently outlined in the compliance principles, that should be included?

No comments on current principles.

Question 4: Structure and form of the Template Do stakeholders support the Panel's proposed approach to revise the Template structure based on plant type to include schedule 5.2, schedule 5.3 and schedule 5.3a plant? Do stakeholders have any suggestions for how the Template should provide guidance to different plant types? Do stakeholders propose any alternative approaches to revising the Template structure to accommodate additional plant types and align with the revised NER?

We have no issue with structuring the template to schedule 5.2, schedule 5.3 and schedule 5.3a plant. Since we operate (and develop) schedule 5.2 plant, our feedback is tailored to this plant. As stated already, the larger number of inverter-based generators in the NEM should be the focus of the updates to the Template. Both synchronous and inverter-based generators are schedule 5.2 plant. To have a more accessible Template, the panel may wish to split these out noting the vast difference between the technologies.

Question 5: Testing and monitoring regimes for schedule 5.3 plant and schedule 5.3a plant In general terms, what kinds of tests and monitoring regimes are included in existing compliance programs for schedule 5.3 plant (certain loads and distribution networks) and schedule 5.3a plant (HVDC links)? Is there a consistent structure for these programs that can be leveraged for the Template? Are there any existing methodologies in the Template that would be appropriate to apply for new plant types? Are there any specific testing or monitoring methodologies that are unique to a specific plant type that the Panel should consider including in the Template?

Since we operate (and develop) schedule 5.2 plant, we'll focus on that and won't comment on regimes for schedule 5.3 and schedule 5.3a plant.

Question 6: Appropriateness of existing testing and monitoring regimes Despite the extensive changes to the technical requirements in Schedule 5.2, which existing testing and monitoring regimes in the Template are likely to remain suitable for new plant? Are there any specific details about existing testing or monitoring regimes in the Template that should be amended to account for the rule changes listed above? For example, should the suggested frequency of testing of particular methodologies be amended for more effective compliance programs?

We feel that the suggested frequency of testing could be clearer and more consistent in the Template. For Kiamal Solar Farm, the protection at the point of connection and the main 33 kV buses are located within the Kiamal Terminal Station which is operated and maintained by our Network Service Provider. The Template appears to have inconsistencies with regards to the frequency of testing for protection systems, at times stating, "at least every 5 years" but in other areas stating, "as appropriate to the technology". This makes conversations with our Network Service Provider regarding their maintenance schedules more difficult as we do not have a clear guide for activities such as calibration of transducers or secondary injection tests for relays. For example, a search for the word "transducer" in the existing Template yields a frequency of testing of either 3 years, 5 years or "following plant changes" in different sections of the Template.

Question 7: Suggestions for new testing or monitoring regimes Are stakeholders aware of any new testing or monitoring regimes that could contribute to making more effective compliance programs for performance standards made under the amended access standards? Are there any commonly used regimes that are not currently listed in the Template?

We suggest that testing for alternative means of receiving dispatch instructions is added to the Template. For example, if the primary method of receiving dispatch instructions is via AEMO FTP and SCADA is back-up then the SCADA implementation should be routinely tested.

Question 8: Reflecting changes in technology and cost in the Template Does the current Template appropriately consider all technology types? If not, how can the Template be amended to better reflect newer technologies? Have the costs of the compliance methods listed in the Template changed significantly? What changes, if any, could be made to the Template to reflect updated information on the costs of testing and compliance regimes.

Our compliance methods are implemented either internally, using our third party contractor or via our Network Service Provider. We would be happy to discuss the cost implications with the panel or working group representatives directly.

If you have any questions on this submission, please feel free to contact Trevor Lim via trevor.lim@totalenergies.com.

Yours sincerely,

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Trevor Lim
Head of Grid & Markets

Submitted on behalf of TotalEnergies Renewables Australia Pty Ltd