Akaysha Head Office,
Level 7, 22 Gordon Street
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Australian Energy Market Commission

Submitted via AEMC Webportal

11 May 2026

Dear AEMC team

ERC0394: Improving the NEM access standards – Package 2 Draft Determination

Akaysha Energy (Akaysha) appreciates the opportunity to provide the Australian Energy Market Commission (AEMC) with a response to the Draft Determination on the NEM Access Standards Package 2.

We appreciate the large, multi-phased, work program that AEMO had previously undertaken in consulting with industry to inform the recommendations and specific rule changes proposed in the Draft Determination and Draft Rule. Akaysha was deeply engaged in the Package 1 consultation, and has remained engaged throughout Package 2 – particularly in respect of the changes that impact on generation and bidirectional units as well as on large inverter-based loads. Akaysha appreciates the role that large load play in the secure operation of the power system. We acknowledge that the size of load has been categorised based on the potential impact to the system and the technical requirements are based around a tiered approach.

We have provided brief comments on a number of the sections below. We also note the AEMC decision to not progress with additional changes to generator protection systems, which we support.

Akaysha looks forward to continuing to engage with the AEMC on this Rule Change, and we would welcome the opportunity for a follow-up discussion in respect of the proposed changes to credible contingency definitions. For more information on this submission please contact Emma Fagan at [redacted].

Kind regards

Emma Fagan

General Manager – Policy and Regulatory Affairs

akaysha

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Review of proposed changes

NER Clause	Relevant change	Akaysha comments
S5.2.5.5(u)	Disturbance ride-through capability	NSP would need to develop a list of non-credible contingencies that are likely to be classified as credible and will need to administer this list going forward. We note that this point appears to revisit recommendations made in Package 1. In our response to the Package 1 Draft Rule, Akaysha opposed this requirement, and we still maintain those concerns. Due to future changes network changes, non-credible contingencies may become more likely, and therefore require generators with already agreed performance to ride through the reclassified events. The AEMC needs to consider in consultation with the NSPs and AEMO how the list of reclassified non-credible contingencies will be administered and how existing projects will be required to meet non-credible contingencies that become more likely. Where an existing participant was previously unable (and not required) to ride through a newly classified event the GPS may need to be alter from AAS to NAS. Akaysha and a number of other stakeholders raised concerns with AEMO during their targeted consultation process on the application of this requirement, and the risks of it resulting in multiple rounds of modelling requests by network service providers (NSPs) for all possible variations of fault scenarios. We do not think that the updated wording proposed by AEMO in the draft Rule fully mitigates these concerns. As outlined by the AEMC in the Draft Determination, the intent of the new clause S5.2.5.5(r2) is to "include, where agreed by the NSP and AEMO, a specified plant limitation for which the plant is not required to remain in continuous uninterrupted operation for a specified combination of power system disturbances or associated conditions. The required response of the plant for such combinations of power system disturbances or associated conditions must also be specified, to be as close to continuous uninterrupted operation as reasonably practicable." Our interpretation of this text in the Draft Determination, as well as the drafting in the Draft Rule, is that AEMO and the NSPs will determine limits for when the plant is not required to remain in continuous uninterrupted operation; while still determining a

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		range of scenarios where continuous uninterrupted operation is expected. Our concern is with the latter. The current wording risks: • NSPs developing myriad scenarios – with OEMs being unwilling or unable to round multiple rounds of tests for scenarios that may be extremely fringe. • Connection standards being delayed by months or years to account for modelling a larger range of scenarios. An alternative would be for S5.2.5.5(r2) to just require NSPs and AEMO to establish the scenarios in which continuous uninterrupted operation would not be required and assume that in all other scenarios it would be required.
S5.3.1a (2)	Application of the schedule	Akaysha supports the introduction of a tier approach to performance requirements that reflects the participation a load may have on system security. If the burden of compliance becomes too onerous, load applicants may begin to split into multiple connections just under the tier threshold, this may present as a risk to system performance.