



7 May 2026

Anna Collyer
Chair
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Ms Collyer,

Improving the National Electricity Market access standards (Package 2) – Draft determination

Origin Energy Limited (Origin) welcomes the opportunity to comment on the Australian Energy Market Commission's (AEMC) draft determination for Improving the National Electricity Market (NEM) access standards – Package 2.

Origin supports the broad intent of the draft rule to modernise the NEM access standards in Chapter 5 of the National Electricity Rules (NER). In particular, Origin supports efforts to improve the clarity and consistency of technical requirements, support the efficient connection of emerging technologies such as large inverter-based loads, and maintain power system security and resilience as the generation and load mix continues to evolve.

However, Origin has concerns with aspects of the draft rule that may introduce unnecessary uncertainty, complexity and burden for connection applicants. Origin's comments focus on the proposed treatment of reclassified non-credible contingency events in the automatic access standard, and on ensuring the proposed compliance and testing reforms are implemented in a clear and proportionate manner.

Automatic access standard should not be expanded to include reclassified non-credible contingency events

Origin does not support the proposed amendments to clause S5.2.5.5 that would require Schedule 5.2 plant, under the automatic access standard, to ride through non-credible contingency events that are likely to be reclassified as credible under clause 4.2.3A and likely to cause a significant disturbance at the connection point.

Origin does not consider that the current drafting of clause S5.2.5.5 creates material uncertainty that requires amendment. The existing framework appropriately links disturbance ride-through obligations to credible contingency events, while managing non-credible contingencies and reclassified events through separate planning and operational mechanisms. This distinction remains appropriate.

Reclassified events are, by their nature, operational and dynamic. They arise from changing system conditions and are managed through AEMO's reclassification processes, system constraints, network advice and public reporting. Where a non-credible contingency may present a material risk to power system security, the existing planning framework also provides mechanisms for that risk to be considered and managed.

In particular, clause S5.1.8 already requires NSPs, when planning a network, to consider non-credible contingency events that could potentially endanger power system stability. Where the consequences to a network or Schedule 5 Participant are likely to be severe, the clause requires the NSP and/or Schedule 5 Participant, in consultation with AEMO, to install, maintain and upgrade emergency controls within the NSP's system, the Schedule 5 Participant's system, or both, as necessary.

This framework already recognises that non-credible contingency risks may need to be managed through a combination of network and participant-side measures, depending on the nature of the risk. That is more appropriate than converting a broad and evolving class of potential future reclassified events into standing automatic access standard obligations for connecting plant.

Origin is concerned that the proposed approach may disproportionately place responsibility for managing these risks on connection applicants. Generators and other Schedule 5 Participants may have a role in managing some risks, including through emergency controls or agreed operational measures. However, embedding future reclassified events in the automatic access standard could be overly onerous, particularly where the occurrence, classification and operational management of those events are largely outside the control of connection applicants.

It would also risk creating greater uncertainty than the proposed amendment is intended to resolve. The automatic access standard should provide a clear and reasonably certain benchmark that can be assessed at the time of connection. The proposed drafting would instead introduce a category of events that may change over the operating life of a plant as the network, asset condition, outage environment and broader system conditions evolve.

A published list of likely reclassified events would not fully resolve this issue. Such a list may improve transparency, but it is unlikely to provide a complete or enduring basis for assessing performance standards. Events that are relevant at the time of connection may change, and new risks may emerge after a plant has been designed, assessed and commissioned. This could expose applicants to evolving performance expectations or compliance risk for events that were not sufficiently defined during the connection process.

The proposed change could therefore increase modelling complexity, broaden the scope of technical studies and prolong performance standard negotiations without materially improving the management of non-credible contingency risks.

Origin considers that the more proportionate approach is to retain the current distinction between credible contingency ride-through obligations under clause S5.2.5.5 and the operational management of non-credible and reclassified events under the existing framework. Greater transparency around reclassification risks may be useful, but this should be pursued through guidance, operational publications and targeted engagement between AEMO, NSPs and proponents, rather than by expanding the automatic access standard to include uncertain future events.

If the Commission considers further transparency is required, Origin would support measures that improve visibility of the types of events that may be relevant to reclassification decisions, provided those measures do not create new automatic access standard obligations. Any consideration of reclassified non-credible contingency events should remain capable of being managed through negotiated performance standards, targeted mitigation measures and operational arrangements.

Narrower minimum access standard does not resolve concerns with including reclassified non-credible contingency events in the automatic access standard

Origin acknowledges that, under the draft rule, the minimum access standard would remain limited to credible contingency events used by the NSP for network planning. However, this does not resolve the concerns outlined above, because potential future reclassified non-credible contingency events would still be included in the automatic access standard.

The automatic access standard is the key benchmark for connection applicants. It provides the pathway to access without needing to negotiate a lower standard and, in practice, NSPs will generally seek performance standards as close as reasonably practicable to that benchmark. Where an applicant

cannot meet the automatic access standard, it must justify a negotiated access standard, which can add time, complexity and uncertainty to the connection process.

As a result, including potential future reclassified non-credible contingency events in the automatic access standard could still materially affect connection applications, even if the minimum access standard is narrower. Applicants may still be expected to assess, model and explain their capability to ride through those events, or justify why a negotiated standard is appropriate.

A narrower minimum access standard therefore does not address Origin's concern with embedding these events in the automatic access standard. That standard should remain a clear and reasonably certain benchmark that can be assessed at the time of connection. Potential future reclassified non-credible contingency events do not provide that level of certainty. Origin therefore reiterates that it does not support the proposed amendments to clause S5.2.5.5 and considers that reclassified non-credible contingency events should instead be managed through negotiated performance standards, targeted mitigation measures or operational arrangements.

Compliance and testing changes should be clear, proportionate and supported by guidance

Origin supports, in principle, the proposed amendments to clauses 5.7.2 and 5.7.3 to improve visibility of performance standards and support effective compliance with technical requirements. This includes the proposed changes relating to requests for testing or assessment, evidence of compliance, AEMO-directed compliance testing and directions for suspected non-compliant plant. These reforms are important as the number and type of Schedule 5 Participants connecting to the NEM continues to evolve.

However, the proposed compliance and testing changes could create additional regulatory and practical burden for connecting customers, particularly where they extend obligations or testing rights to a broader range of Schedule 5 plant and participants that may not have previously been subject to equivalent requirements.

Origin therefore considers it important that these powers are clear, proportionate and supported by guidance on when and how they are expected to be used. This would help ensure the framework supports compliance and system security outcomes without creating unnecessary uncertainty or administrative burden for connecting customers.

In particular, guidance should clarify the circumstances in which testing or assessment may be requested, the type of evidence that may be required, how materiality and proportionality will be considered, and how AEMO and NSPs will coordinate the use of these powers. This would improve predictability for connection applicants and support more efficient implementation of the proposed changes.

If you wish to discuss any aspect of this submission further, please contact Megan Findlay at

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Yours sincerely,

[REDACTED]

Sarah-Jane Derby
Group Manager, Regulatory Policy