



Ref. A6281285

7 May 2026

Tiffany O'Keefe
Project Lead
Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2001

Dear Ms O'Keefe

Reference ERC0394
AEMC Draft Determination - Improving the NEM Access Standards – Package 2

Powerlink Queensland (Powerlink) welcomes the opportunity to provide input to the Australian Energy Market Commission's (AEMC's) Draft Determination on the *National Electricity Amendment (Improving the NEM access standards – Package 2) Rule* published on 12 March 2026.

Much of the National Electricity Market (NEM) continues to experience growing interest in the connection of large loads supplied through converter-based technologies, including large Inverter-Based Loads (IBLs). Powerlink agrees that targeted updates to access standards that reflect the technical impacts of large IBLs are necessary to maintain a secure and reliable power system while avoiding unnecessary technical requirements and compliance costs.

As such, Powerlink supports the Draft Determination and has provided additional feedback below on specific aspects of the proposed amendments.

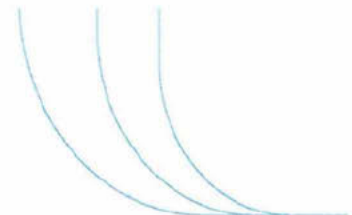
Short circuit ratio

Powerlink considers that explicit provisions should be made for facilities with hybrid loads (i.e. a combination of IBLs and non-IBLs at a single site), and that clarity is required on how Schedule 5.3.11 (Short circuit ratio) of the National Electricity Rules (the Rules) applies to the IBL component of the overall load. This should include an agreed value at which the plant has capability sufficient to operate stably and remain connected to the transmission network.

We support the use of the System Strength Impact Assessment Guidelines (SSIAG) as the appropriate vehicle for providing more detailed guidance on the methodologies and test procedures applicable to different plant configurations, including hybrid loads. The SSIAG however, should be updated to provide clear guidance on the adjustments required by the Australian Energy Market Operator (AEMO) where assessments or tests consider only the IBL component of a hybrid facility's total load.

Response to voltage disturbances

Powerlink considers it necessary to introduce NEM performance standards in the Rules to provide uniform guidance to proponents on expected responses to voltage disturbances in support of power system security. Embedding these requirements in the Rules will promote a consistent approach across the NEM for IBLs similar to that applied to generators.



While Powerlink agrees with a pragmatic approach, requirements that are materially less stringent than those applied internationally may discourage Original Equipment Manufacturers (OEMs) and developers from configuring plant to utilise its full technical capability for NEM applications. Powerlink recommends that the Automatic Access Standards be aligned with internationally proven, in-service capabilities. This would allow negotiation of performance between AEMO, Transmission Network Service Providers and connecting parties above the Minimum Access Standards and provide a pathway to manage any project-specific technical challenges that arise in the NEM.

If you have any questions or require further clarification in relation to this submission, please contact me at

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Yours sincerely

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Jennifer Harris
General Manager, Network Regulation

