

Ms Tiffany O'Keefe
Australian Energy Market Commission

Submission made online at www.aemc.gov.au

07 May 2026

Dear Ms O'Keefe

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

SA Power Networks welcomes the opportunity to comment on the AEMC's draft determination for improving the NEM access standards – Package 2.

We broadly support the AEMC's direction, which focuses on addressing system security impacts of large inverter-based loads and improving the current access standards framework to address large loads.

Our key views detailed are summarised below:

1. Definition of a Large IBL

SA Power Networks supports the introduction of a clear, NER-embedded definition for a Large IBL (e.g., ≥ 30 MW), noting the threshold in the current System Strength Impact Assessment Guidelines (SSIAG) may be considered too low. We agree that large IBLs should no longer be classified solely through the SSIAG but instead clearly defined in the National Electricity Rules.

2. AEMO's Guidance on Modelling Requirements

We support AEMO's new mandate to provide guidance on modelling requirements for large loads under Section 2.3, noting that expectations must remain scalable and proportionate to the potential system impact of each project. However, modelling expectations must recognise the current maturity of the sector and avoid imposing obligations that are impractical for proponents or Original Equipment Manufacturers (OEM) to meet.

3. Ride-Through Requirements

The proposed ride-through requirements for voltage and frequency disturbances are supported, as they reduce the risk of large IBLs disconnecting during system events and improve overall power system security. However, we note a potential contradiction between the requirements for load availability to Under-Frequency Load Shedding (UFLS) (Section 4.3.5(a)) and the obligations under the draft rule S5.3.12 relating to response to frequency disturbances. These provisions could be interpreted as conflicting, as they appear to require loads to both automatically disconnect and remain connected during under-frequency conditions. In the South Australian context, all relevant loads are expected to be incorporated into UFLS schemes. Consequently, there is no operational requirement for these loads to remain connected when system frequency falls below the normal operating frequency band, as their intended function is to disconnect automatically to support system stabilisation. We agree, however, that maintaining ride-through capability for frequency disturbances above the upper bound of the normal operating range remains appropriate and necessary.

4. DNSP Determination of Technical Requirements

SA Power Networks agrees that DNSPs are best placed to determine technical requirements based on distribution-level constraints and local network conditions. However, allowing DNSP discretion for Tier 1 and Tier 2 connection requirements may result in inconsistent interpretation and application of the Rules across different jurisdictions. Further guidance is required on the scope, methodology and acceptance criteria that should be utilised to assess adverse impact on the quality and security of network services to other network users, especially for technical matters relating to broader bulk power system security implications.

5. Behavioural Response to Tier Thresholds

SA Power Networks has observed proponents sizing projects just below tiered thresholds (e.g., 4.95 MW projects under the Chapter 5A framework) to avoid step changes in technical requirements. This behaviour has system security implications and should be considered when designing tier-based thresholds to ensure they achieve the intended policy outcomes.

We look forward to continuing to engage with the AEMC to deliver a fit for purpose framework to enabling the energy transition. Should you have questions on any aspect of our submission, please contact me at [REDACTED].

Yours sincerely,

[REDACTED]

Andrew Lim
Connections Engineering Manager

