From: Submissions
To: [redacted]
Subject: FW: Submission Received
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From: DoNot Reply [redacted]
Sent: Thursday, 7 May 2026 9:14 AM
To: Submissions <[redacted]>
Subject: Submission Received

The below submission has been lodged and confirmed on the AEMC Web site.

Submission Type: Rule Change

Reference: Improving the NEM access standards – Package 2

Organisation: VicGrid

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Comments: Overall, we have reviewed the draft determination alongside the current VicGrid (VG) guidelines to identify key differences and potential gaps. Our intent is to identify areas where a tighter requirement may be beneficial to ensure the draft rules work effectively in practice, given our experience with implementing new technical guidelines for IBL.
For distribution connections, while the proposed three tier MW based classification approach appears intended to simplify the process for smaller connections, we note the potential risks associated with connection location and network characteristics, fault level, and the cumulative impact of multiple IBL connections. These factors may not always be adequately captured through an MW classification approach and may warrant further consideration.
In addition, it appears there may be scope for reduced modelling and performance requirements for Tier 1 and Tier 2 connections subject to NSP discretion; this may warrant further specificity.

1. Risk of negotiated disconnection below 0.9pu
Also, can you please explain the rationale behind the 0.7pu threshold and whether it can be reduced?
The AEMC draft rules allow data centres to negotiate for disconnection or reducing active power by any amount under 0.9pu from MAS, and the AAS is 0.7pu (No other thresholds under 0.7pu). This creates uncertainties in how large IBLs will behave during moderate to deep faults, since each UPS may trigger disconnection at different voltages that are below 0.9pu, potentially amplifying a disturbance rather than containing it.

2. Has there been any consideration to include a requirement for active power ramping?
The draft rule doesn't include any requirements on active power ramping.
IBLs, including the growing development of AI loads, will be free to impose fast changes in power demand on the grid. AI loads in particular are characterised by abrupt power swings. If these fluctuations are passed directly to the grid without any explicit control, they can create sudden frequency deviations, local voltage variations, and sharp reactive power swings.

3. Has there been any consideration to include a ride through requirement for angle shifts?
There might be risk here because the power system can experience rapid angle changes. If loads are not explicitly required to tolerate these angle shifts, their control systems may lose track on the grid angle.

4. Missing requirements for anti-islanding and re-synchronisation.
This allows IBLs to disconnect and operate in islanded mode without any obligation to return to the grid in a coordinated way.

5. Modelling requirements.
The draft rules do not strictly require OEM specific EMT models or detailed UPS control logic, NSPs and AEMO have far less visibility into how large IBLs will actually behave during large disturbances. Critical dynamic behaviours such as current limiting, UPS control logics, and ride through capabilities, may be inaccurately modelled in studies.

6. Three-tier MW-based classification framework.
Recognising the rationale behind the tiering approach, but we would like to highlight the risks because MW size does not always correlate with system security impact. We also need to consider system strength, fault level and network topology which also contribute to system security. On top of that, multiple small IBLs may aggregate to produce disturbances equivalent to a single large load. Also, Tier 2 connections are not automatically required to meet the MAS/AAS performance requirements. They are only subject to those requirements if the NSP chooses to apply them.

7. The AEMC proposed a hybrid of MW thresholds and impact based assessment for modelling/performance requirements.
However, no standardise methodology has been proposed for this impact-based assessment. In addition, this approach relies heavily on NSP discretion, two identical IBLs in different states may face different modelling and performance requirements, creating NEM wide inconsistencies.

8. No mandatory requirements for multiple fault ride through
Although the draft rule prohibits protection based on fault counting, it does not require IBLs to ride through multiple successive disturbances. Multiple fault events are increasingly common in low SCR areas, and without such requirements, IBLs may sequentially trip after each disturbance, creating cascading outages.

9. Transitional rule - new standards apply immediately on final rule publication. Ongoing projects get up to 6 months to continue under old rules.
This creates a risk for last minute submission of connection applications attempting to get grandfathering.

10. Draft rules mention nothing around 5.3.12
we note that many data centre proponents are not locked into a specific OEM or finalised capacity during R0. In practice, it is common for capacities, technology, and OEM selections to change at R1 or through 5.3.12. The draft determination does not appear to address how the proposed three tier MW based classification framework would interact with or be applied through the 5.3.12 process, including the associated modelling and performance requirements that may change along with the capacity or OEM upgrades.

URL: https://www.aemc.gov.au/admin/structure/contact/messages/29817