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Australian Energy Market Commission
60 Castlereagh Street
Sydney NSW 2000

Rule change ERC0394 — Improving the NEM access standards (Package 2)

Supplementary submission: frequency and RoCoF ride-through (S5.3.12) and load-shedding (S5.3.10)

Syncline Energy made a submission to the draft determination on 6 May 2026.

We appreciate that submissions closed on 7 May 2026, but we wanted to offer this short supplementary note for the Commission's consideration ahead of the final determination and would be grateful if it could be received on the record and, if possible, published on the website.

We write to clarify one aspect of our submission — our rate-of-change-of-frequency (**RoCoF**) recommendation — and to put forward a constructive alternative.

1. Our RoCoF bands were expressed in magnitude terms and should have clarified that data-centre load flexibility is only relevant to under-frequency excursions - that is, to reduce data-centre demand when generation is short and thereby complement the under-frequency load-shedding framework. Our intent was to add staged resilience between 1 Hz/s and the *must-not-disconnect* envelopes at ± 3 Hz/s and ± 4 Hz/s.
2. However, an autonomous facility-level IT load reduction armed on RoCoF could shed too much load and overshoot the frequency response. That would cause an instability in the opposite direction.
3. An AEMO-coordinated response to under-frequency is the appropriate basis for any load response, and we therefore support S5.3.12 as drafted and offer our fast under-frequency capability through S5.3.10.

Syncline notes that a load of VAIH's scale already carries the automatic under-frequency interruptible-load obligation in NER 4.3.5, and that clause 4.3.5(c) permits capability enabled as a market ancillary service to count toward it.

Syncline proposes to make the Victorian AI Hub's fast under-frequency demand-reduction capability available as an armed, AEMO-coordinated service under S5.3.10 — for example as a contingency-FCAS or fast-frequency-response product. And we would hope to work with AEMO to determine the MW size and triggers for that service.

Because the facility's co-located grid-forming STATCOMs (with synchronous-condenser support) absorb the reactive surplus and voltage rise that a fast active-power reduction produces, the facility can provide this service without creating the voltage or reactive-power instability (relevant to S5.3.14) that an equivalent unsupported load reduction would cause.

This keeps the access standard undiluted while making the flexibility available to the system as a controlled, dispatchable resource - consistent with our position that a facility with co-located firming and grid-forming support should be recognised and rewarded as net system-strength positive.

We would welcome the opportunity to develop the S5.3.10 service concept further through the technical working group. Please contact the undersigned with any questions.

Yours sincerely

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