

Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

**For the Attention of Mr James Hyatt**

**Reference code EPR0076**

7 May 2020

Dear Mr Hyatt,

**DISCUSSION PAPER – INVESTIGATION INTO SYSTEM STRENGTH FRAMEWORKS IN THE NEM**

Reach Solar energy ("Reach") is very pleased to provide its response to the discussion paper prepared by the Australian Energy Market Commission (AEMC) titled "Investigation into System Strength Frameworks in the NEM" dated 26 March 2020.

By way of background, the intent of Reach is to develop 1200MWac of large-scale solar photovoltaic (PV) by 2020/21. The driver for this new-build is the existing Renewable Energy Act legislation and a Reach target of structuring solar PV projects such that they can compete with wind, gas and black coal-fired generation without a government grant.

Reach management (see [www.reachsolarenergy.com.au](http://www.reachsolarenergy.com.au)) have a proven track record with operations, development and raising large-scale capital for both energy and infrastructure projects in South Australia, other States in Australia and internationally.

Firstly Reach welcomes the revisit by the AEMC into system strength frameworks put in place in 2017 and April 2018. In our response at that time Reach favored a least-cost solution procured by the TNSP charged to users through network connection charges. Reach reaffirms this preference what is termed in the discussion paper a 'centrally coordinated approach'.

Secondly Reach suggests plant system strength modelling during the connection application phase (in PS-CAD and PSS/E) encompass expected future network conditions. Current modelling is limited to present network conditions. Using the Integrated System Plan PS-CAD models, modelling the project operation in 2 years time (during commissioning), at 5years time, and 10 years time would give investors confidence the plant can operate reliably in the future and validate the system strength actions of the TNSP.



I hope this is of interest to AEMC and please do not hesitate to contact me if you have any questions on the same (0447 350 442 or [julian@reachsolarenergy.com.au](mailto:julian@reachsolarenergy.com.au)).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'JD', with a long horizontal line extending to the right.

Mr. Julian Dichiera