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Hamburg, September 30<sup>th</sup> 2020

**Project Reference Code: ERC0312**  
**Submission to the Rule Changes on Simplification of NER definitions**

Dear Sir or Madam,

We welcome the opportunity to provide our comments on the simplification of NER definitions rule changes.

About us:

The Nordex Group is one of the world's leading suppliers of wind turbines based on DFIG technology with 35 years experience in the harnessing of wind energy. The joint company Nordex and Acciona Windpower combine decades of experience in designing, constructing and operating wind turbines, delivering more than 29 GW of sustainable energy worldwide.

**Comments on Simplification of NER definitions**

With regards to simplification of NER definitions we would kindly like to ask you to shift requirements from the glossary to the corresponding chapter or clause. The reading and analyzing of NER would be simplified and more transparent if no further requirements need to be expected in the glossary. Definitions are expected to be a help for understanding of certain terms and to specify terms and definitions. Therefore, the entering of further requirements in the glossary might be misleading. Furthermore, some requirements of the glossary seem to give a large range for interpretation. It's important to define:

- when a requirement has to be considered
- when a requirement is judged as met or violated by defining clear tolerances

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To underline the statement above an example is considered in the following. The definition for "*continuous uninterrupted operation*" includes the following requirement under clause (d):

"not exacerbating or prolonging the disturbance or causing a subsequent disturbance for other connected plant, except as required or permitted by its performance standards,"

The words "exacerbating" and "prolonging" are not further defined and can be interpreted differently in dependence of a subjective evaluation. From manufacturer point of view this is rated as a big risk.

We would like to suggest to shift relevant passages to the corresponding clause (for this example S5.2.5.5) and to define the requirements more precise e.g. What behaviour in reactive current infeed and active power contribution must be met to avoid that the behaviour is rated as "exacerbating" or "prolonging"? When is a behaviour judged as "exacerbating" and "prolonging" e.g. when the voltage and frequency of the grid, measured at PoC, is impacted negatively (negatively=abbreviation contrary towards nominal values) by  $< 0.01$  of nominal voltage, frequency respectively.

Is this clause also applicable for fault clearance? E.g. if clause (c) is met:

"after clearance of any electrical fault that caused the disturbance, only substantially varying its active power and reactive power as required or permitted by its performance standards established under clauses S5.2.5.5, S5.2.5.11, S5.2.5.13 and S5.2.5.14; and"

Can the performance of the generating system or unit still be judged as "exacerbating" or "prolonging"?

It would accelerate processes and lower risks by improving the definition and requirements to make them as transparent as possible.

Nordex would like to thank you in advance for considering the suggestions above. Please, don't hesitate to contact us in case of any questions and please keep us informed about updates regarding the rule change request.

Yours sincerely,

Nordex Energy GmbH  
Grid Integration (EGI)

A handwritten signature in blue ink, appearing to read 'Malte Laubrock', with a long horizontal flourish extending to the right.

Malte Laubrock  
Head of Grid Integration

A handwritten signature in blue ink, appearing to read 'i.A. I. Neumann', with a long horizontal flourish extending to the right.

Ina Neumann  
Senior Engineer