

**Table 1. Response to the First stage of System Strength Rules Consultation**

No.	Consultation questions	SA Power Networks' Comment
3	In the context of clause S5.1a.9 of the Amending Rule, what are stakeholders' views on the inclusion or exclusion of existing and forecast IBR in the assumptions for determining minimum fault level requirements?	Inclusion of existing and forecast IBR in the assumptions for determining minimum fault level requirements are advised. Although there should be a minimum synchronous fault level requirement which is independent on connection of different IBRs.
4	What are stakeholders' views on how protection equipment requirements for minimum fault level can be assessed, both now and for the coming decade?	AEMO, TNSP and DNSP to collaborate more frequently to ensure protection settings are taken into consideration for minimum fault level requirements. Also, it should be noted that protection equipment needs to have appropriate measurement accuracy to be able to differentiate between normal load current and low fault level current, which could potentially differ by tens of Amps in certain low fault level areas.
10	Do stakeholders have specific proposals for how to assess how distributed PV impact available fault levels considering their sparsity, uncertainty and visibility?	It should be noted that DNSP connected distributed PV or BESS generating systems can have an impact on the Transmission defined system strength nodes if considered as one lumped generating system. Should DNSP connected unregistered generating system be subjected to system strength charges to address this? If so there should be something in the updated guidelines about how and who will be responsible to enforce this.
14	What do stakeholders consider to be the pros and cons of the three proposed options for assessing future voltage waveform stability? Should any other options be considered? If so, what options?	It is understood that for option 3 (AFL), a negative AFL will indicate insufficient system strength. For option 3 (sensitivity coefficients) <b>larger values</b> would represent higher sensitivity and therefore low system strength in the conventional sense. However, it is not clear which value would be considered larger or if there is a threshold. A combination of both options (2 and 3) can be utilized for assessing stable voltage waveform in the future.
20	Do stakeholders have specific suggestions for how DNSP-connected generation plant could be incorporated, given that the ISP predominantly considers transmission-connected plant?	Could consider DNSPs being able to create their own System strength nodes based on minimum fault level requirements at TNSP-defined SSNs. Also, DNSPs should be able to charge embedded generators a flat fee as a system strength charge which can be passed on to TNSP for system strength remediation schemes.

<b>25</b>	Do you consider that the proposed selection criteria will allow for an appropriate set of system strength nodes to be selected? If not, please provide specific alternatives or additions.	From DNSP point of view, we think that there also should be a set of system strength nodes in the distribution network. If AEMO is not going to formally define these nodes then DNSPs should be given authority to define and manage their own minimum system strength levels on the distribution network.
<b>30</b>	Are there any other issues relevant to the general system strength impact that AEMO ought to take into account?	Have AEMO considered a collective impact from DNPS connected generating systems on the TNSP defined system strength nodes?