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By online Submission

Melbourne, 21. May 2024

Dear Ms. York,

**Re: System Strength Impact Assessment Guidelines amendment consultation**

Vestas welcomes the opportunity to provide our feedback on AEMO's Draft System Strength Impact Assessment Guidelines (SSIAG), shared on 22 April 2024.

Vestas has a vision to become the global leader in sustainable energy solutions, and everything we do revolves around the development and deployment of sustainable energy solutions.

We would like to express our general support to AEMO's Draft SSIAG under consultation, in response to AEMC's National Electricity Amendment (Calculation of system strength quantity) Rule 2024.

Vestas also supports the recommendations to improve the system strength framework expressed on the Clean Energy Council's Discussion Paper 'Fixing the system strength frameworks' ([Systems-Strength-Report\\_2024.pdf \(cleanenergycouncil.org.au\)](#)) released in March 2024.

The SSIAG was designed to address the NER 4.6.6 clause and the system strength quantity (SSQ) is part of this comprehensive and complex document. AEMO is also proposing minor changes to the Guidelines, and we understand there are other improvements that AEMO should consider, as highlighted in the Appendix.

Should you wish to discuss any aspect of our comments, please contact Marco Aurelio Lenzi Castro via [mlzto@vestas.com](mailto:mlzto@vestas.com) or 0488 152 925, or the undersigned.

Yours sincerely

**Vestas - Australian Wind Technology Pty. Ltd.**



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## Appendix: Comments on specific items

### General comments:

- The use of general terms such as ‘*as soon as practicable*’, ‘*upon receipt*’, ‘*reasonable opinion*’, and ‘*reasonable advice*’ should be avoided in all AEMO’s Guidelines because they lead to different interpretations and ambiguity among NSPs, AEMO and connection applicants.
- AEMO should include a new section to reflect the transitional rules (NER clauses 11.163.1 to 11.163.6) for applicants that are part-way through a connection process or have already commenced paying the charge under the current arrangements.

### 2.3 Plant alterations

#### 2.3.1 Generating system alterations under NER 5.3.9

- In the version 209 of the NER, released on 4 April 2024, the Clause 5.3.9 does not have the subclauses (a)(1)(ii) and (a)(2)(ii) mentioned on the SSIAG Draft, 2.3.1 (a). The correct reference should be 5.3.9(a)(1) and 5.3.9(a)(2).
- The SSIAG should clearly state that AEMO will provide the written technical justification on why in its opinion the proposed alteration will have a general system strength impact.

### 5.1 System strength remediation schemes

#### 5.1.2 Acceptable SSRs

- The SSIAG allows the use of system strength remediation schemes (SSRs) only behind the connection point. However, the NER 4.6.6 does not restrict the location for such scheme. Therefore, the SSIAG should not prevent connection applicants to propose self remediation solutions in front of the connection point, as highlighted in CEC’s Discussion Paper ‘*Fixing the system strength frameworks*’.

#### 5.1.5 Consultation with AEMO

- It’s important to establish a clear timeline for NSP to consult with AEMO after receiving the proposed SSR and not relying on general expressions such as ‘*as soon as practicable*’. Therefore, we suggest 5 business days as the time limit for NSP to submit such consultation to AEMO (5.1.5 (a)).

#### 5.1.6 Rejection of proposed SSR

- According to 5.1.6(a)(i), the NSP must reject the SSR proposal that ‘*is not reasonably likely to avoid or remediate the general system strength impact of the 4.6.6 Connection.*’ However, the SSIAG should state that NSP will provide the written technical justification for rejecting the SSR proposal, including the criteria applied to assess it.
- The same principle should be applied when NSP rejects the SSR proposal based on its ‘*reasonable opinion*’, that would adversely affect the quality of supply for other Network Users (5.1.6(a)(ii)) and when it would affect the power system security on AEMO’s advice (5.1.6(a)(iii)).

### 6.1 System strength locational factor

#### 6.1.2 Timing

- The SSIAG must establish clear timelines for NSP to initiate and conclude the SSLF calculation after receiving the connection enquiry.
- The same principle should be applied to 6.1.2(b) and 6.1.2(c).

#### 6.1.4 Methodology for undertaking SSLF calculation

- According to 6.1.4(b), *'it is recommended that the applicable SSN is the nearest SSN that is located within the same region as the electrical location of the 4.6.6 Connection.'* However, connection applicants should be able to choose the system strength node (SSN) that minimises the overall system strength cost and not only the node with the lowest system strength locational factor (SSLF), because the current limitation might lead to higher costs for connection applicants to address the same issue, as underlined in CEC's Discussion Paper *'Fixing the system strength frameworks'*.
- The same principle should be applied to 6.1.4(c).
- In addition, connection applicants should have information on all system strength nodes available for selection and their associated system strength charges.

### 6.2 System Strength Quantity

#### 6.2.2 Timing

- The SSIAG must establish clear timelines for NSP to initiate and conclude the calculation of the indicative system strength quantity (SSQ) after receiving the connection enquiry (6.2.2(a)), a request for a Preliminary Assessment (6.2.2(b)) or a request to provide a revised indicative SSQ (6.2.2(c)).

### 8. Stability Assessment

#### 8.2 Timing

- The SSIAG must establish clear timelines for NSP to initiate and conclude the Stability Assessment after receiving an application to connect, or a submission under NER 5.3.9(b) or 5.3.12(b), that includes an election to pay the system strength charge.