

# Addendum to draft report Stakeholder feedback template:

## AEMO Review of technical requirements for connection (NER 5.2.6A)

Stakeholders making a submission on the recommendations set out in the addendum to the draft report may use the below template to provide feedback. Feedback on the **addendum** is due to AEMO by **5:00 pm, 23 May 2023** (please note the earlier submission date for feedback on the primary draft report).

Please consider the confidentiality disclaimer at the end of this document.

### Stakeholder: TasNetworks

#### Schedule 5.3 Conditions for Connection of Customers

| Issue                                                                         | Schedule 5.3 Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>Policy positions</b>                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Recognition of different load technologies                                    | TasNetworks supports the premise that loads be required to support network stability as much as they are technically capable of. It is understood that inverter based loads ( <b>IBL</b> ) have some additional capabilities over “traditional” loads. This greater flexibility in voltage and frequency control should be recognised in their connection standards so these capabilities are provided to the system. However, the rules should not prevent other load types that have capability from also being required to participate if required. TasNetworks would want the ability to negotiate solutions with parties regardless of the technology type as appropriate. TasNetworks therefore supports option 2. |
| Size and technology-based thresholds for ride through capability requirements | TasNetworks supports the view that any inherent capability to remain in operation for a disturbance of some limited magnitude and duration should be required to be provided to the extent reasonably possible. It is critical this ability is able to be tailored to local requirements as this is most likely to see a positive cost benefit to consumers. It is expected that ensuring contingency requirements are reduced would ensure the overall objectives of the National Electricity Objective ( <b>NEO</b> ) are met. TasNetworks support options 2 and 3.                                                                                                                                                    |
| Treatment of different load technologies within a load facility               | TasNetworks supports option 2, to accommodate different load technologies within a load facility.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Continuous uninterrupted operation (CUO) requirements                         | TasNetworks supports option 2, the application of a light-handed approach to CUO that includes part (d) of the CUO definition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Treatment of loads with uninterruptible power supplies                        | TasNetworks support option 1, treating large loads with uninterruptible power supplies ( <b>UPS</b> ) in the same way as other large loads. Regardless of whether a load has UPS the effect on the network of it islanding is the same as it disconnecting. We acknowledge that some UPS type installations may support the network through a disturbance. However, as AEMO points out, these will be addressed through the new Integrated Resource Provider category.                                                                                                                                                                                                                                                   |
| AEMO advisory matters                                                         | TasNetworks supports option 2, prescribing load access standards that relate to AEMO’s system security functions under the National Electricity Law ( <b>NEL</b> ) to be AEMO advisory matters. This will assist in negotiations with proponents who may seek to align standards between regions.                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>New definitions – for use with ride-through requirements</b>               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Single facility load                                                          | TasNetworks supports option 1. It will provide added clarity to the threshold for assessment under Schedule 5.3. The flexibility for the local network service provider to adjust the threshold to account for local conditions is important.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Issue                                                         | Schedule 5.3 Recommendations                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Large single facility load                                    | TasNetworks supports defining “large single facility load” as a “single facility load” equal to or greater than a size threshold that is the minimum of the regional maximum load contingency size. The presumption is that each discrete load component is treated separately in an analogous way that a generating system can be made up of multiple generating units each below the threshold.                         |
| Large single facility inverter-based load                     | TasNetworks supports AEMO’s recommended definition.                                                                                                                                                                                                                                                                                                                                                                       |
| <b>New/amended clauses for ride-through requirements</b>      |                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Operation of large loads during frequency disturbances        | TasNetworks supports AEMO’s recommended action and with AEMO advisory being applied.                                                                                                                                                                                                                                                                                                                                      |
| Operation of large loads during contingency events            | TasNetworks supports AEMO’s recommended action and with AEMO advisory being applied.                                                                                                                                                                                                                                                                                                                                      |
| Operation of large loads during voltage disturbances          | TasNetworks supports AEMO’s recommended action and with AEMO advisory being applied.                                                                                                                                                                                                                                                                                                                                      |
| <b>NER S5.3.3 – protection systems and settings</b>           |                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Link to ‘ride through’ requirements and maximising protection | TasNetworks supports AEMO’s recommended action.                                                                                                                                                                                                                                                                                                                                                                           |
| <b>NER S5.3.10 – Load shedding facilities</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Emergency Under-frequency ramp down of large loads            | TasNetworks recommends the threshold be maintained at 10MW, with loads proposing how they can meet the requirement. The proposed solution must meet the requirements of the service being provided. For example, a ramp in output must be provided when required and not delayed to when it is more convenient to the plant. This obligation should remain for load connections and not be commercialised as a “service”. |
| <b>New clause for instability monitoring and prevention</b>   |                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Stability of IBL – monitoring, protection and performance     | TasNetworks supports AEMO’s recommended action and with AEMO advisory being applied.                                                                                                                                                                                                                                                                                                                                      |

## Confidentiality disclaimer

Under clause 5.2.6A(d)(2), AEMO is required to publish all submissions received about this Review on its website. Please identify any part of your submission that is confidential, which you do not wish to be published. Please note that if material identified as confidential cannot be shared and validated with other interested persons, then it may be accorded less weight in AEMO’s decision-making process than published material. AEMO prefers that submissions be forwarded in electronic format.