



Ref: A5292004

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Ms Merryn York  
Executive General Manager, System Design  
Australian Energy Market Operator  
GPO Box 2008  
MELBOURNE VIC 3001

*Via email: [contact.connections@aemo.com.au](mailto:contact.connections@aemo.com.au)*

Dear Ms York

### **AEMO REVIEW OF TECHNICAL REQUIREMENTS FOR CONNECTION**

Powerlink Queensland (Powerlink) welcomes the opportunity to provide input on the Australian Energy Market Operator's (AEMO's) Draft Recommendations Update Report (Part 1) (Update Report) for its review of technical requirements for connection. This submission reflects our commitment to continue to provide safe, secure, reliable and cost-effective transmission services to more than five million Queenslanders.

To ensure technical requirements for connection remain appropriate during the energy system's transformation we recommend that AEMO:

- adopt a less prescriptive approach to the specification of technical requirements in the National Electricity Rules (the Rules) to accommodate the evolution of generation technologies and knowledge of power system engineering over time. Some of the proposed changes which we consider inappropriate in the Rules include guidance for engineering judgements. We consider that improvements to overall performance of the power system in the interests of consumers is best supported by an adaptive approach where market participants, Network Service Providers (NSPs) and AEMO apply engineering knowledge and make judgements that can reflect a connecting plant's specific circumstances and attributes;
- reassess the desirability of increasing the complexity of automatic access standard requirements for generating systems. We consider this approach may not achieve the intended outcomes and instead favour an approach that encourages proponents to discuss their particular requirements with NSPs under the negotiated access standards;
- apply caution when contemplating carve-outs in the Rules for when generating units are offline or not producing energy. For example, we consider the current draft amendments could allow a solar farm not to clear 33kV reticulation faults at night-time; and
- not recommend the Rule change is fast-tracked, given two rounds of consultation would be prudent to ensure all relevant impacts are captured in amendments to the Rules.

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These points and responses to specific questions raised in AEMO's Update Report are discussed in more detail in Attachment A.

We look forward to working with the team at AEMO on this review of technical requirements for connection. If you have any questions or require further clarification in relation to this submission, please contact Sachin Goyal.

Yours sincerely,



Stewart Bell  
Executive General Manager, Network and Business Development

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**Attachment A – Feedback for AEMO Review of Technical Requirements for Connection**