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Thursday, 9 December 2021

Samantha Christie
Manager Network Planning
Australian Energy Market Operator
GPO Box 2008
Melbourne VC 3000

Dear Samantha

RE: Network Support and Control Ancillary Services Description and Quantity Procedure Review

Transgrid welcomes the opportunity to respond to the Australian Energy Market Operator's (AEMO) consultation on Network Support and Control Ancillary Service (NSCAS) Description and Quantity Procedure Review.

Transgrid is the planner, operator and manager of the high voltage transmission network connecting electricity generators, distributors and major end users in New South Wales and the Australian Capital Territory. Transgrid's network is also interconnected to Queensland and Victoria, and is instrumental to an electricity system that facilitates competitive low cost electricity supply for consumers.

Australia is in the midst of an energy transition. This is primarily driven by changing community expectations and choices, advances in renewable energy technologies, retirement of existing generation, and the adjustments required in Australia's economy to meet our international climate change commitments. These changes raise complex issues in relation to the design and operation of the NEM, including over-voltage management issues across many areas of the transmission network due to continued reduction of operational demand.

Transgrid is in agreement with AEMO on the planning assumption that no transmission line may be switched out of service before a credible contingency event in order to meet system security and reliability obligations, such as addressing high voltage levels when conducting the NSCAS review.

Transgrid considers that this is necessary given the rapidly evolving network and the lead times for network investment. Transgrid strongly believes that it would be unreasonable to rely on line switching in planning studies. Line switching would be a viable option when operating the network; for example, to address multiple contingency events or multiple reactors out of service at the same time. Assuming line switching in planning studies will basically remove real-time options when the system evolves beyond the forecast. Transgrid believes that line switching should be considered only as a temporary measure while waiting for the implementation of an identified NSCAS need.

Transgrid appreciates the opportunity to comment on this consultation. If you would like to discuss this submission, please contact Jahan Peiris on 02 9620 0884.

Yours faithfully



John Howland
Acting Head of Network Planning