

Merryn York
EGM System Design
Australian Energy Market Operator
Level 12, 171 Collins Street
Melbourne VIC 3000

15 May 2025

RE: Response to the Consultation for the Registration Information Resource and Guidelines (RIRG)

Dear Ms York,

Tesla Motors Australia, Pty Ltd (Tesla) welcomes the opportunity to provide the Australian Energy Market Operator (AEMO) with feedback on the Consultation Paper for the Registration Information Resource and Guidelines (RIRG). Tesla is generally supportive of the RIRG and the broader workstream within the Connection Reform Initiative to streamline challenges in the R1 process.

Tesla strongly endorses the proposal in section 4.2 of the RIRG that 'for large alterations, only those performance standards impacted by the alteration would be renegotiated.' Tesla sees this having enormous benefits in improving the efficiency and timeliness of the connection process. A clarification within this recommendation is defining what is deemed as a large alteration – for instance, Tesla suggests that this could be applied for a change exceeding 5% of the plant's active or reactive power rating.

A second area of clarification is on the exact timing for the Connection Applicant to complete the R1 Capability Assessment Request Form between receiving the 5.3.4A letter and registration. While the draft guidelines suggest that this should be completed immediately prior to registration, within the form, there is a field to 'identify any known changes that have not yet been incorporated into the models or settings.' However, Tesla's interpretation of the RIRG suggest that any changes should have already been incorporated because the form is submitted just before applying for R1.

Tesla notes a section of proposed requirements in the form that are likely to add onerous reporting while not supporting the objectives of the RIRG. In the field, 'Dynamic model changes', the first bullet point on requiring all OEM model version histories and change logs will be burdensome given there are frequently updates to the model that do not affect a specific project or GPS. Tesla suggests that the second bullet point, on detailing model changes that could impact the plant's performance standards, will provide enough information for the NSP and AEMO.

Additionally, Tesla finds the 'identify any specific known issues' field as redundant, as known issues must be resolved for registration to be completed. Finally, Tesla encourages revising section 3.2.1's ability to request additional simulation studies in the RIRG, adding to the to the existing comprehensive connection process modelling requirements, as this may delay the process, countering streamlining objectives.

Tesla looks forward to continued engagement and actively participating in ongoing discussions to streamline the R1 process. We welcome a workshop with AEMO to discuss any items raised above or more broadly on this topic.

Kind regards,

Tesla Energy Policy Team
energypolicyau@tesla.com