17 June 2021

Ms Anna Collyer
Chair
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Electronic Submission – ERC0300

Draft Rule Determination – Efficient management of System Strength on the Power System

Dear Ms Collyer

Energy Networks Australia (ENA) welcomes the opportunity to provide a response to the Australian Energy Market Commission's (AEMC) Draft Rule Determination on the Efficient Management of System Strength on the Power System.

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

The purpose of the rule change request by TransGrid was to proactively plan the network to enable efficient levels of system strength to be made available in investment timeframes and streamline the new connections process to better meet the system strength requirements. The draft rules will see the National Electricity Market (NEM) move to a full unbundling of the system strength services from 1 July 2025.

ENA supports initiatives that aim to reduce total costs for customers. While ENA accepts the Energy Security Board's (ESB's) and AEMC's preference for unbundling of services where this is efficient, in practice this approach must be tested to ensure that the benefits of the final rule materially outweigh the costs.

The annual costs of providing system strength services may be material, volatile and difficult to forecast, as the Australian Energy Market Operator (AEMO) responds to real-time operational issues. The implications of the volatility of these costs on Transmission Network Service Providers (TNSPs) and customers' needs to be considered further.

ENA recognises that the AEMC has initiated this investigation alongside several related rule changes and that system strength services are also considered within the ESB's post 2025 reform program – Essential System Services (ESS) and Ahead Markets. As such, we expect that stakeholder thinking will continue to develop throughout this process as the various reforms and rule changes are explored further, and we encourage the AEMC to take an integrated approach to these issues. It will be important to understand the costs and timeframes to deliver other aspects of the ESS framework and implications for this rule change to ensure that system strength services are optimised and costs to customers minimised.

In summary, ENA:

- Supports the reasonable endeavors obligation on the TNSPs/AEMO, as the system strength service providers (SSSP), to meet the system strength standard in investment timeframes;
- Recommends that the system strength planning standard needs to provide sufficient headroom to ensure a secure power system under a range of normal foreseeable operational conditions, including maintenance to effectively operate and maintain the network, consistent with good electricity industry practice;
- Agrees with the AEMC, the SSSP obligation is not an obligation to meet at any cost, as recent experience has shown, nor is it an at all times and all circumstances obligation;
- Notes the implications of the full unbundling of energy and system strength services and requires that the cost implications for customers be carefully considered to ensure that the most efficient outcome is achieved, including the transition on 1 July 2025 and the consequential costs to customers in each region;
- Supports using the existing Regulatory Investment Test – Transmission (RIT-T) process to assess options to meet the proposed system strength standard and utilise the current regulatory cost recovery arrangements for contingent project applications, cost pass-through and network support arrangements;
- Recommends further consideration of whether the framework is fit for purpose in Victoria noting, for example, a competitive tendering process would need to follow the AEMO RIT-T process and any contracted assets would need to be commissioned within the 3 years;
- Supports the concept of the access standards proposed, including a Short Circuit Ratio (SCR) that should be no higher than 3, and ideally lower, noting jurisdictional standards are already in place;
- Welcomes more explicit acknowledgement that alternate technologies without provision of fault current can also be considered as a means of providing system strength;
- Where contract solutions are concerned, ENA would support a continuation of the existing approach (6A.7.2 and 6A.7.3) on an ongoing basis as a flexible and fit for purpose arrangement to enable the timely recovery of system strength contract payments that are triggered by an obligation to meet a system strength services standard by AEMO; and
- Supports explicit transitional arrangements to provide cost recovery for TNSPs that are within their regulatory period by including deemed contingent project triggers to meet the system strength standard obligations.

ENA has provided a more detailed response in Attachment 1 and drafting suggestions in Attachment 2.

ENA welcomes the ongoing constructive engagement with the AEMC on this rule change and would be pleased to provide further input as required. Should you have any queries on this response please feel free to contact Verity Watson, vwatson@energynetworks.com.au.

Yours sincerely,

Jill Cainey
General Manager Networks

Attachment 1

Supply Side

Support the System Strength Service Provider (SSSP) using reasonable endeavours to procure system strength to meet the requirements in planning timeframes (T+3)

ENA welcomes the development by AEMO and publication by 31 August each year of an annual 10-year rolling forecast of the efficient levels of system strength. This provides a more proactive approach to ensuring the power system has the essential system strength levels needed by planning around three years in advance to meet the standard. ENA support this forward-looking and centrally coordinated approach between the TNSPs and AEMO as a significant improvement on the current approach, aligned with the original TransGrid rule change proposal.

The obligations on SSSPs are in two parts:

- Maintain the minimum three phase fault levels; and
- Achieve stable voltage waveforms for Inverter Based Resources (IBR).

The SSSP needs to use reasonable endeavours to plan, design, maintain and operate its transmission network or make system strength services available to AEMO to meet the specified requirements at the identified system strength nodes. ENA supports this approach.

ENA also recommends that the system strength planning standard needs to provide sufficient headroom to ensure a secure power system under a range of normal foreseeable operational conditions, including planned outages to effectively operate and maintain the network, consistent with good electricity industry practice. This should help minimise the need to impose deep constraints on IBR plant as a result of operational conditions. Furthermore, ENA suggests the rules or Guidelines incorporate deterministic criteria to deliver this headroom for normal operational conditions.

Importantly the AEMC notes that this is a *reasonable endeavours obligation*; it is not an obligation to be met at any cost, nor is it an obligation to meet the standard at all times and in all circumstances. The primary intent is that the network is planned in investment timeframes to ensure that there is sufficient system strength to cover normal operational conditions, including consideration of maintenance. This approach is also consistent with many of the rules in Schedule 5.1 to 'plan and design' to meet certain planning standards, but noting it is unusual to include the words 'maintain and operate' in this regard. ENA notes the Guidelines are expected to define the system strength standard for planning purposes; however, for clarity and consistency, ENA considers this should also be reflected in the rules.

The AEMC considers it in the long-term interest of customers that AEMO might constrain off (or down) some IBR plant if stable voltage waveform is not able to be achieved through the investments made by a SSSP at all times and in all circumstances, rather than have potential over-investment by the SSSP. Certainly, AEMO appears better placed to make this choice in operational timeframes and to recover any associated costs via the market.

Procuring to ensure an efficient level of system strength, accounting for state policy and connection contracted resources

The SSSP is required to coordinate procurement of a portfolio of solutions to satisfy the system strength standard. The AEMC states that the SSSP cannot rely on system strength services which are coincidentally provided by synchronous generators as a result of the generator being dispatched in the energy market[1]. The implication is that these system strength services that have previously not been valued will now need to be valued and assessed against the cost of network and other non-network options, with customers ultimately bearing the costs.

The cost to the TNSP as SSSP will no longer be to meet the minimum shortfall of system strength or to provide additional levels of system strength to an efficient level (i.e. to address the 'gap') but rather to meet the full costs of the essential levels of system strength. The AEMC is making a decision to fully unbundle system strength, hence it is extremely important that the standard is set appropriately and the SSSP has sufficient time to consider a range of options in investment timeframes.

In determining the system strength requirements at each system strength node AEMO will need to project the size, type and operational profile of facilities connecting near each system strength node and their contribution to the system strength requirements. In developing its Integrated System Plan (ISP) AEMO will need to anticipate the likely impacts of state policy in determining the system strength requirements of each SSSP to ensure an appropriate standard is set, which results in the most efficient cost of these services to customers.

Implications of energy providers becoming system strength providers need to be well understood

ENA remains concerned that there may be limited negotiating power in non-network contracts[2] and TNSPs may be exposed to significant volatility based on higher than expected contract usage by AEMO. In the first instance, the SSSP faces the payment volatility under the service contract. As the framework is currently drafted, these costs form part of the residual service costs recovered via transmission use of system charges from customers over subsequent years.

The intent of the rule change request by TransGrid was to proactively plan the network to enable efficient levels of system strength and streamline the new connections process in a forward-looking approach. This is in contrast to the reactive backward-looking arrangements currently in the rules under which TNSPs are required to fill declared shortfalls or gaps of system strength.

The draft determination reflects an unbundling of system strength services from energy. In the market today synchronous generators provide system strength and inertia as part of the energy dispatched and there is no additional payment. The implications of the full unbundling of energy and system strength and the cost implications to customers need to be carefully considered to ensure the most efficient outcome is achieved.

As more renewables enter the market, synchronous generators can be expected to operate less and less and at some stage exit the market. However, if the synchronous generator is required to run to meet

[1] AEMC Draft determination, Efficient Management of System Strength, 29 April 2021, p75

[2] In the long run the price of contracts can be expected to be capped at the cost of installing network equipment to address system strength requirements.

requirements under a system strength services contract, then the full cost to run is likely to be reflected in the service price. In other words, the costs to run in synchronous mode and participate in the energy market as an energy service provider could be quite different from the costs to run as a synchronous services provider with energy as the by-product. The full implications of this transition on 1 July 2025 need to be considered for customers in each region.

From the discussion in the ESB's Post 2025 Options Paper, it is evident that the efficient provision of system strength services is likely to be achieved by:

- TNSPs planning and designing to meet the specified system strength services standard through an appropriately designed investment framework; and
- AEMO procuring and scheduling system strength services as required in an operational timeframe.

AEMO's system strength dispatch task would be greatly assisted by scheduling and procurement tools that determine how best to combine the available services procured by TNSPs and the operational services that may be procured by AEMO. The market design elements of the unit commitment scheduler and system security mechanism, the associated costs and the timeframe to implement also need to be considered in this current rule change.

Rules should cater for technological innovation

ENA considers the rules relating to system strength should cater for technological innovation and reflect that there is no direct or ideal metric available to define system strength. Drafting the rules in too prescriptive a manner may unduly constrain how SSSPs mitigate system strength requirements, thereby imposing additional costs on new generation assets seeking to connect to the network and on customers.

For instance, under clause 5.3.4B(h), ENA considers it unnecessary to require connection applicants to specify ratings of the proposed plant in MVA as it assumes that remediation can only be achieved by new synchronous plant. Removal of this specification will recognise that system strength remediation can be achieved by re-tuning inverters, as was done recently in North Queensland, or through other technological solutions.

Employ the RIT-T to assess options

ENA supports using the existing RIT-T process to assess options to meet the proposed system strength standard and utilize the current regulatory cost-recovery arrangements, including both contingent projects once these are in the revenue determinations and cost pass-through arrangements and network support arrangements where applicable.

These arrangements support delivery of system strength services within planning and investment timeframes and are not well suited to deliver on short notice additional needs.

It is therefore important that the 3-year notice period prior to the relevant year is maintained. System strength is a locational requirement and as such it will be important to assess all feasible options such as re-tuning inverters, seeking system strength services from generators where they are able to meet the requirements at the system strength node and to consider network options.

Importantly, the regulatory arrangements require consideration of all options and for the most cost-effective option to be selected. In Western Victoria and North Queensland, shortfall requirements

were met by generator re-tuning, while an agreement was reached with a hydroelectric generator for services to meet the shortfall in Tasmania. In South Australia, given the scale and urgency of the system strength requirements, a network solution has been deployed as the least-cost option.

There may be limited options available to the SSSP to seek additional procurement of services in timeframes of less than three years and regulatory cost recovery arrangements may not support this more urgent need. AEMO procurement of short notice contracted resources or non-contracted resources is therefore likely to be a more cost-effective option in shorter operational timeframes as discussed above.

Support forward-looking projection on needed system strength nodes beyond three years

ENA welcomes the forward planning of system strength requirements and the integration of this process in the regulatory framework. The SSSP would assess network and non-network options under the RIT-T as a Reliability Corrective Action and procure the most cost-effective, reliable solution.

An urgent system strength shortfall was declared in South Australia in October 2017. ElectraNet investigated options through an economic assessment process and is now commissioning equipment to meet the requirements. The requirement to complete the regulatory process and implement solutions in a three-year timeframe is tight based on current experience.

ENA acknowledges that AEMO will prepare a system strength requirements methodology by 30 September 2022 which will outline the system strength nodes and the process for declaring them. ENA welcomes this methodology and broader consideration of system strength nodes so that there is transparency of system strength tracking at potential new nodes in the yearly report so that the SSSP (and the potential market for non-network options) is better prepared when the three-year compliance obligation is triggered.

Meeting the generator performance standard still requires detailed technical analysis

The AEMC has noted in the past that it is not its intention to limit the technical analysis TNSPs undertake for connection requests. ENA is concerned that the drafting of clause 5.3.4B (a2)(3)(ii) could cause confusion, as it gives the impression that detailed Electromagnetic Transient (EMT) analysis is not required if a proponent agrees to pay for the system strength charges.

It will still be necessary for TNSPs to conduct this detailed technical analysis as part of establishing generator performance standards. Proponents will still need to provide appropriate models to support this analysis and the drafting of clause 5.3.4B (a2)(3)(ii) could lead to confusion on this point.

ENA considers the AEMC should revisit this issue to clarify the intent of this provision.

Are the arrangements fit for purpose in Victoria?

AEMO is the Victorian jurisdictional planner and has the SSSP role in Victoria with the system strength obligations. Similarly, AEMO as the SSSP will need to undertake a RIT-T and assess options to meet the system strength requirements. In addition, AEMO will also need to undertake a competitive tender process for the preferred option once the RIT-T is completed, noting this may further limit the time available to deliver solutions. ENA queries whether the three-year timeframe and framework in Victoria

is fit for purpose to enable compliance with the obligations and recommends further consideration of these implications.

Demand Side

ENA supports the concept of the access standards applying to specified new connections and connection alterations including the capability to have a minimum SCR. ENA believes the SCR should be set no higher than 3.0, and ideally lower, noting jurisdictional standards already in place. For example, the SCR connection standard has been set at 1.5[3] in South Australia under jurisdictional licensing requirements for several years.

ENA recognises the difficulties in defining system strength which is a complex concept and there is no direct or ideal metric available. While the AEMC considers that the system strength standard can evolve and adapt over time and that AEMO could publish the changes in the system strength requirements methodology, the SCR requirements should remain for the specified new connections/alterations.

ENA would also welcome more explicit acknowledgement that alternate technologies without provision of fault current can also be considered. As an example, if a system strength node had sufficient fault current to ensure correct operation of protection systems, but a (relatively) soft voltage waveform was precipitating an inter-plant controller instability problem, adopting a synchronous condenser solution to meet the fault current standard may not be cost effective. Other emerging solutions which provide less fault current compared to synchronous condensers may be a better solution in this situation. Innovative emerging solutions such as virtual synchronous machines and grid-forming batteries can be deployed and can be incrementally expanded, retuned to offer different benefits and maintained through modular replacement parts. These should not be precluded as options on either the supply or demand side.

ENA also notes that the AEMC may be considering issues relating to network service provider connected batteries in the Integrating Energy Storage Systems into the NEM Rule change currently under consideration. Rules should not preclude NSP provided batteries where these may be a more cost-effective outcome to meet system strength requirements.

Cost recovery for TNSPs

The draft rules do not include any transitional provisions relating to revenue allowances for TNSPs who are SSSPs. The AEMC considers that this is not necessary, because TNSPs part way through a regulatory period can either:

1) "subsume" costs within an existing revenue allowance; or

2) submit a contingent project application; or

3) rely on the cost pass through rules.

Option 1 and 2 are not feasible for TNSPs who are also the SSSP, and who have already submitted their revenue proposals and have not had an opportunity to identify the needed contingent project trigger in

[3] Noting that this requirement applies at the equipment terminals and is roughly equivalent to a SCR at the point of connection of 2, in comparison with the proposed SCR in the draft rule of 3.

their proposal. The rules require that a contingent project and associated trigger events must be approved in the revenue determination for the applicable regulatory period.

ENA also queries the reliance on option 3, as the applicable cost pass-through trigger event is not clear. In particular is it unclear what the relevant regulatory change event would be if this pass-through category were to be relied upon: the rule itself being made, the AEMO annual system strength report commencing in 2022 which triggers an obligation in 3 years, or the date the SSSP needs to meet the new service standard set out in S5.1.14. To qualify as a regulatory change event, the event needs to fall within the definition of a regulatory obligation or requirements in section 2D of the National Electricity Law (NEL).

SSSPs are likely to incur costs before the first compliance obligation in 2025. Therefore, on the latter view TNSPs would not be afforded revenue for the costs incurred. It is important that the relevant regulatory change event is clear given the specified time period under the Rules (90 business days) for any cost pass-through application to be made to the Australian Energy Regulator (AER). ENA notes that the change of rules itself may constitute a regulatory change event. However the system strength requirements for system strength nodes are not yet known and the regulatory processes have not yet assessed the options and costs, making this an unsuitable trigger event for the purposes of cost pass through.

If none of these options are feasible for a given regulatory year, TNSPs will be left in a situation where they are unable to recover these SSS costs through their approved maximum allowed revenue. This is not consistent with the revenue and pricing principles in the NEL that transmission businesses should be provided with a reasonable opportunity to recover the efficient costs associated with the system strength service.

ENA suggests that the relevant regulatory change event be linked to the specific system service standard obligations triggered in the AEMO annual system strength reports. TNSPs would need to make a cost pass-through application to the AER for the occurrence of a change event on a forward-looking basis. For contract solutions, TNSPs may later need to come back to the AER to true up for actual costs incurred on a backward-looking basis as annual contract payments are settled.

The existing system strength cost pass-through arrangements under the Rules operate such that:

- A fault level shortfall event is provided as a separate category of pass-through event under clause 6A.7.3 and is defined to occur where a TNSP is required to provide, or cease providing, system strength services, and meeting this requirement materially increases or materially decreases the TNSP's costs of providing prescribed transmission services. This allows up front recovery of forecast costs.
- Payments made to third parties under system strength services agreements (i.e. system strength service payments) are defined to be a type of network support payment and differences in the forecast amount of network support payments for a regulatory year and the actual network support payments in that regulatory year can be passed through to customers under the network support pass through in clause 6A.7.2 of the rules. This allows for the annual true-up of actual system strength service payments incurred.
- In this way, as intended by the AEMC's 2017 system strength rule, a transmission business is able to use a combination of forward-looking cost pass-through fault level shortfall event provisions under clause 6A.7.3 of the Rules and the backward-looking network support pass through provisions

under clause 6A.7.2 to recover in a timely manner the actual costs incurred during a regulatory control period in order to meet a system strength shortfall.[4]

Where contract solutions are concerned, ENA would support a continuation of this existing approach on an ongoing basis as a flexible and fit for purpose arrangement to enable the timely recovery of system strength contract payments, noting the need to ensure that the initial trigger event is suitably linked to the commencement of a system strength service obligation identified by AEMO at the point in time at which a cost estimate is available.

ENA would be happy to assist with the drafting if this would be helpful for the AEMC.

Where capital investment solutions are concerned, ENA also supports the flexibility to have appropriate contingent project triggers to meet the system strength standard obligations, as this will be crucial for revenue proposals in the transitional period. A specific transitional provision to deem such contingent project triggers to apply for the purposes of existing revenue determinations at the time the new Rule takes effect should therefore be considered, consistent with the intent of the AEMC for TNSPs to have access to this cost recovery mechanism. ENA has proposed indicative drafting in Attachment 2 for consideration.

Pricing Methodology and Pricing Methodology Guideline

Proposed clauses 6A.23.3A(a) and 6A.23.3A(b) refer to a 'forecast' for year t-1 in price setting whereas this would typically be referred to as an 'estimate' as the TNSP would have some actual information on hand at this time. The use of the term 'forecast' for year t is appropriate as a forecast is typically entirely forward looking. We note this would require consequential changes to 6A.23.3A(c).

We note that proposed clause 6A.25.1(i) provides for the AER pricing methodology guideline to include "principles for determining forecast annual system strength revenue and forecast actual annual system strength revenue." As TNSPs are routinely required to establish forecast elements and actuals for annual pricing it is not clear that specific guidance is required for system strength related revenue. TNSPs are best placed to understand the level and timing of new connections being commissioned and potentially using the SSSPs system strength service. It is therefore recommended that this be removed as an unnecessary level of prescription which could result in inconsistency.

Workable timeframes to reflect system strength activities in the Transmission Annual Planning Report (TAPR)

Rule 11.xx.2 currently requires the initial publication by AEMO of the system strength requirements methodology and the first annual system strength report by 30 September 2022.

Rule 5.12.2 (c) (13) commences on 30 September 2022 and requires the 31 October 2022 TAPR to include the system strength locational factors, yet at this stage there can be no connections who are utilising the system strength locational factors as the charges are only published in March 2023 and the connections process also changes. Rule 5.12.2 (c) (8) (ii) also requires the TAPR to provide information on activities to meet the standard in clause S5.1.14 at the system strength nodes. Rule 5.20C.3 (f) also requires the TAPR

[4] AEMC, *Rule Determination, National Electricity Amendment (Managing power system fault levels) Rule 2017*, 19 September 2017, p.49.

to include certain information on planned activities to be undertaken to meet obligations at system strength nodes.

ENA considers that one month between the first annual system strength report (30 September 2022 under Rule 11.xx.2) and the requirement to provide information on activities to meet the requirements in the 2022 TAPR (31 October under the rules above) is insufficient. The transitional arrangements in the Draft Determination appear to suggest that the TAPR requirements commence in October 2023. The proposed dates in the transitional rules and the proposed commencement date of Schedule 2 appear inconsistent with the draft determination. ENA note that the transitional arrangements in Rule 11.xx.12 (b) clarify that the first TAPR to pick up the new system requirements is the Oct 2023 TAPR, yet the drafting does not include 5.12.2 (c) (8) (ii). ENA welcomes further clarification from the AEMC on this matter.

TNSPs faced a similar issue in the development of the actionable ISP rules framework with the timing of the ISP publication and the fixed timing in the rules for publications of TAPRs. A new clause was therefore added in the joint planning requirements in 5.14.4 (c) to enable AEMO to provide near final regional demand forecasts by no later than 30 June each year for consideration in TAPRs. Use of a similar approach would enable AEMO to finalise publication of its key documents whilst TNSPs are afforded the system strength requirements and data they need to consider the information and activities needed in the October TAPR.

ENA therefore suggests that a practical solution would be to provide a similar clause, after the proposed 5.14.4 (d) so AEMO must provide the system service standard requirements for each system strength node and the system strength standard specification expected to be in the annual system strength report by no later than 30 June each year. ENA has proposed drafting in Attachment 2. ENA note that if this drafting is adopted in Schedule 2 which commences on 30 September 2022, this provides suitable notification for future years and a similar clause would still be required in the transitional schedule to cater for early notification in June 2022.

Similarly, the AEMC may also need to consider earlier timing of system strength node declarations.

An alternative approach could be to amend the transitionals to require the first system strength report by 30 June 2022, which means that subsequent annual system strength reports would also be required by that date. The timing of the node declarations may also need to change.

Attachment 2

Clause reference	Issue
5.14.4 (e) – joint planning early notice of system strength requirements for Oct TAPR	As noted in Attachment 1 it is important to provide the TNSP with early notification of the system strength requirements and nodes. ENA suggests a new clause 5.14.4 (e): (e) By no later than 30 June each year, *AEMO* must provide *Transmission Network Service Providers* with: (i) a draft of the forecast *system strength requirements* for each *system strength node* to be published in the *System Strength Report* for that year; and (ii) draft system strength standard specifications (as defined in S5.1.14(a)) to be applicable at each *system strength node* during the 12 months following publication of the *System Strength Report* for that year.
5.3.4C	Reference to "an election being made under clause 4.3.4B(b1)" should be "an election being made under clause 5.3.4B(b1)". [*Note: the cross-reference is correct in the amending rule format, but not in the mark-up format of the Draft Rule*.]
11.xxx.1(a) – definition of "new clause 5.3.4B"	Reference to "clause 5.3.4C" in this definition should be a reference to clause 5.3.4B.
11.xxx.1(a) – definition of "new clause 5.3.4C"	Reference to clause 5.3.4C " in this definition should be a reference to clause 5.3.4C.
11.xx.2	Prior to the first system strength report published by 30 Sept 2022, include a clause to reflect the equivalent notifications and timing in the proposed drafting for 5.14.4 (e).
11.xxx.xx – transitional contingent project provisions	Insert new definitions in cl 11.[xxx].1(a): **new clause S5.1.14(b)** means clause S5.1.14(b) as it will be in force on and from the effective date.

Clause reference	Issue
	system strength project means a project that is required in order for a *Transmission Network Service Provider* to comply with its obligations under new clause S5.1.14(b). **system strength project trigger** means, for a system strength project, a determination of the *AER* that the *preferred option* satisfies the *regulatory investment test for transmission*. **transitional regulatory control** period means, for a *Transmission Network Service Provider*, a *regulatory control period* which either: a) commences prior to the effective date and wholly or partially overlaps the system strength transition period; or b) commences during the system strength transition period. Insert after cl 11.[xxx].16(b): c) For the purposes of a *revenue determination* for a transitional regulatory control period and clause 6A.8.2: (1) a system strength project is deemed to be a *contingent project*; (2) the *trigger event* for a system strength project is the system strength project trigger.