NODE Energy Services

18 August 2021

Australian Energy Market Commission

ERC0256 - Generator registration and connections rule change

NODE Energy Services (NODE) is pleased to make a submission on the ERC0256 Generator connections and registration draft rule determination. NODE is a grid connection consultancy, that supports clients in securing grid connection for generation projects.

In this submission NODE provides input to key features of the more preferable draft rule.

• Registration, classification and exemption guideline

NODE agrees that AEMO's existing registration guide provides valuable information that helps applicants to understand and navigate the connections and registrations processes.

NODE agrees that codifying the registration guidelines will ensure that AEMO continues to publish these documents into the future. We also support the balance struck by the AEMC, in limiting the extent of consultation requirements when making minor amendments to the guidelines. This would ensure that AEMO can promptly provide updates as per previous practice, while limiting the administrative burden on AEMO.

• Scheduling threshold

The assessment of scheduling costs detailed in the GHD advisory report has sought to quantify the cost of lowering the scheduling thresholds and shows costs outweigh proposed benefits. NODE therefore agrees with the commissions reasons for not lowering the threshold.

In addition to the grid connection and modelling costs included in the GHD advisory report, lowering the thresholds would put further pressure on already resource constrained power systems modelling expertise in the industry, resulting in connection delays and inefficient outcomes.

• Connection's process

NODE shares Mr Vermeer's initial concerns that registration exemptions are provided too late in the connections process. This process can involve a wide range of power system studies to support development of generator performance standards, which may then become the subject of an exemption during registration.

NODE therefore welcomes the clarity in the preferred draft rule. Better understanding of the applicable process for proposed generators, will increase efficiency and reduce upfront costs for generation developers.

- ## Implementation and transition arrangements

NODE supports the proposed implementation timeframes but notes the proposed wording in the transitional arrangements serves to address only pre-existing projects. The transitional arrangements could be extended to include projects currently in the connection process, that are eligible for an automatic exemption.

NODE considers that transitional arrangements for these automatically exempt projects would provide immediate benefits of clarity as it pertains to the performance standard requirements.

Consideration of projects that are already underway, would enable such projects to continue to progress through the connections process cost effectively.

NODE welcomes the opportunity to discuss any aspects of this submission by email to Muhammad.Saad@nodeaustralia.com or Elizabeth.Maina@nodeaustralia.com

Yours sincerely,

Elizabeth Maina
Director/Principal