



16 May 2023

Part of Energy Queensland

Ms Merryn York
Executive General Manager System Design
Australian Energy Market Operator
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Dear Ms York

The AEMO's Draft Report on Amendments to the Power System Model Guidelines

Ergon Energy Corporation Limited (Ergon Energy Network) and Energex Limited (Energex), both distribution network service providers (DNSPs) operating in Queensland, welcome the opportunity to provide feedback to the Australian Energy Market Operator (AEMO) in response to its *Draft Report on Amendments to the Power System Model Guidelines* (the Draft Report).

In the Power System Model Guidelines (PSMG), Ergon Energy Network and Energex draw to AEMO's attention that:

- in Section 2.1's requirement (d) and (e), generators apply for connection to DNSPs under the National Electricity Rules (NER) clause 5.3A.9, not clause 5.3.4; and
- in Section 2.2's requirement (d) and (e), again, for connection to DNSPs the relevant NER clause is 5.3A.9 rather than clause 5.3.4. For systems under 5 megawatts, unless the integrated resource provider is opting to connect under Chapter 5, the relevant clause is 5A.D.3.

We also support AEMO's addition of section 4.8.4 to the PSMG, with up-to-date models being required for both legacy and new plant, given the material interactions between legacy and new plant that can occur. This clarity will be of benefit to the wider industry.

Should the AEMO require additional information or wish to discuss any aspect of this submission, please contact me on 0429 394 855 or Andrew Bozin on 0436 447 814.

Yours sincerely

Alena Chrismas

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