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18 April 2018

OFFICE OF THE CHIEF EXECUTIVE

**Attention:** Babak Badrzadeh  
Australian Energy Market Operator (AEMO)

By Email: [ModelGuidelines@aemo.com.au](mailto:ModelGuidelines@aemo.com.au)

Dear Babek,

**Powerlink Queensland Submission - Power System Model Guidelines**

Powerlink Queensland (Powerlink) welcomes the opportunity to provide input to the first stage of consultation to the draft *Power System Model Guidelines* (the Draft Guidelines).

Powerlink is supportive of the new and expanded modelling requirements to be able to securely operate and plan the National Electricity Market (NEM) with a rapidly changing mix of technologies and to enable studies to correctly assess plant performance under reduced system strength conditions. Powerlink's support also extends to the requirement on Network Service Providers (NSPs) to provide appropriate models of transmission connected dynamic plant (such as Static VAR Compensators and STATCOMS) and of non-linear plant characteristics.

Powerlink appreciates the collaborative approach undertaken by AEMO in the development of the Guidelines particularly through the technical Task Force coordinated by the Power System Modelling Reference Group (the PSMRG).

Powerlink's key concern relates to the defined model accuracy criteria that need to be satisfied for all plant that impact power system dynamic performance. Powerlink recommends that AEMO and the technical Task Force consider further the Model Accuracy Requirements defined in Section 7 of the Draft Guideline.

Section 7.2.1 and Appendix E of the Draft Guidelines define a set of analytical metrics that must be satisfied. Powerlink believe that the assessment methodologies and accuracy criteria need further development and testing to ensure that:

- the accuracy criteria are meaningful and practical;
- set at an appropriate standard that supports AEMO and NSPs meet their *Rule* obligations;
- there are no unintended consequences and;
- appropriate and practical transitional provisions have been considered taking into account the connection processes in the NER;

If you have any questions in relation to this submission or would like to meet with Powerlink to discuss this submission, please contact Stewart Bell.

Yours sincerely

A handwritten signature in blue ink that reads "Merryn York".

Merryn York  
**Chief Executive**

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