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Dr Babak Badrzadeh

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Level 22, 530 Collins St
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System Strength Impact Assessment Guidelines – March 2018

To: Dr. Badrzadeh,

General Electric (GE) is pleased to provide our response to the Issues Paper – System Strength Impact Assessment Guidelines, March 2018.

GE is one of the world's leading providers of energy solutions, with over one third of all power across the planet being generated by GE technologies. The electricity industry globally is undergoing significant transformation. Complex interrelationships across the entire energy ecosystem pose challenges to power providers and consumers. GE is uniquely positioned to assist the Australian market as we offer solutions across all forms of generation as well as technologies to the TNSP's and DNSP's.

GE welcomes the review of the system strength impact assessment guidelines as it is necessary, considering the increased penetration level of newer generation technologies in the power system.

GE is supportive of the proposed requirements in the System Strength Impact Assessment Guidelines, however, there are certain aspects of the guideline that we believe require further consideration. Below is a summary of key areas where GE recommends AEMO consider further refinements to the proposed requirements.

Key issues

- 4.1.3 Results of Preliminary Assessment – The NSP will undertake an initial assessment of the system strength impact, however a timeline should be imposed on the NSP to provide the results of such assessment.
- 4.2 Full Assessment – The Generator makes a significant investment to put together the *application to connect*, therefore the Full Assessment should be carried out prior to submission of the *application to connect* since the Full Assessment may invalidate the studies carried out to prepare the *application to connect*.
- 5.1 Modifications to control systems belonging to the NSP or other Network Users – It is not clear under which Rules' provision the NSP could demand an existing Network User to adjust their control settings to facilitate say a new generator connection. However, such an avenue would lead to efficient investment since new generators may not require system strength reinforcing solutions to process their connection.



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Should you have any queries in relation to this response then please do not hesitate to contact the undersigned on +61 439630289.

GE looks forward to working with AEMO to ensure that we build resilience in the grid and ensure efficient energy security and reliability into the future.

Sincerely,

Transmitted electronically.

Ragu Balanathan
Technical Director
Onshore Wind – Asia
GE Renewable Energy