

10 December 2021

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To whom it may concern,

RE: NSCAS Description and Quantity Procedure

Thanks for the opportunity to comment on AEMO's NSCAS Description and Quantity Procedure Consultation. Please accept our late submission, which was held up due to competing priorities. Making this submission is important to ElectraNet since it has a direct impact on voltage control requirements we have identified in South Australia (SA).

ElectraNet supports AEMO's proposal that switching lines out-of-service should not be assumed as a long-term planning option for voltage management. This option remains available for operational use at times when the system is operating outside the planning envelope, e.g. due to unavailability of voltage control plant. The following are some of the potential issues that ElectraNet identifies with line switching:

1. Under minimum demand conditions and with more frequent occurrences of zero MW demand, the SA grid will be operating with fewer (and eventually no) conventional generators online. This means switching a line out-of-service reduces system security and also further reduces system strength at times when system strength is already low, potentially impacting market participants' access to supply customers.
2. A weakened grid would also increase the voltage step change experienced during switching of reactive plant and may limit the maximum reactor size that could be switched on the network. With the demand profile potentially crossing through zero MW demand frequently during the day, switching of a cable or a line would introduce unnecessary stress on assets and therefore have an impact on their lifecycle and condition.
3. Switching a line out-of-service to manage voltages reduces the reliability of the grid. An example of this is the Adelaide Metro where the Magill East-Terrace 275 kV line has on occasions been switched historically to manage operational needs. This situation could lead to a breach of the SA Electricity Transmission Code (ETC) N-2 obligation for supply to the Adelaide CBD.

ElectraNet's view is that line switching for voltage management should only be performed as a last resort to provide operational flexibility during planned outages e.g. maintenance of Para SVC.

Yours sincerely,



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