

29 September 2026

Energy Policy WA

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PSSR Standard Review – Consultation Paper and Exposure Draft

Alinta Energy welcomes the opportunity to provide feedback on the 2026 PSSR Standard Review Consultation Paper and Exposure Draft.

We support reforms that maintain power system security and enable the efficient integration of new technologies. However, new obligations should be clearly justified, proportionate to the identified risk and implemented through transparent criteria in the ESM Rules.

Our key recommendations are that:

- If progressed, requests for electromagnetic transient (EMT) models from existing facilities be limited to cases where the model is demonstrably necessary, with clear rules-based criteria, and reasonable endeavours protections;
- if progressed, any power to require control setting changes be tightly scoped, supported by transparent thresholds and safeguards for material technical and commercial impacts;
- curtailment be used only as a temporary security measure and not as a substitute for timely procurement of system strength solutions;
- system strength planning and procurement remain technology-neutral, transparent and proportionate to the likelihood and timing of forecast shortfalls; and
- technical requirements specified by reference to a facility-wide maximum operating range be revised so they remain proportionate to the generating units actually in service.

Consultation Paper - Submission of EMT models by existing facilities

Alinta Energy supports access to fit-for-purpose models where they are necessary to assess a material system security risk. However, the case for a broad discretion to require existing facilities to develop EMT models has not been established. The East Country incident report does not clearly demonstrate that an EMT model from each existing facility would have prevented or materially mitigated the incident.

If Proposal 3 proceeds, the ESM Rules should specify objective criteria governing when a model may be requested. A request should demonstrate that the model is necessary for a defined study and that less burdensome alternatives, including measurements or existing models, are inadequate. The framework should include reasonable endeavours protections and reimbursement of all reasonable development, validation, testing, and maintenance costs.

Consultation Paper – Control settings changes

Alinta Energy does not support a broad power to require changes to unspecified control,

protection or performance settings. Changes can materially affect facility output, equipment performance, warranties and commercial operation. If progressed, the ESM Rules should define the settings within scope, the security objective, evidentiary threshold and limits on any required change.

The framework should require participant consultation, consideration of reasonable alternatives, reasonable implementation periods and moderation where a proposed change would have material technical or commercial consequences. Any consequential GPS, model or monitoring-plan updates should be targeted and streamlined.

Consultation Paper - AEMO and Western Power assessment responsibilities

Noting the proposal regarding operational settings and the respective roles of Western Power and AEMO, there may be an opportunity to reduce duplication across the GPS framework more broadly. Accountability for connection assessments, modelling reviews and GPS assessments should be more clearly delineated such that a single agency is principally responsible for each assessment step, with the other agency able to rely on that assessment except where specific concerns are identified.

The current framework can result in the same models, assumptions, studies and technical material being reviewed multiple times by different parties. This can increase costs, extend connection and modification timeframes, and create uncertainty where different interpretations are formed regarding the same underlying technical evidence.

We recommend adopting a more NEM-like approach, where the Network Service Provider and AEMO undertake their respective assessments in parallel and the operator's role is generally focused on system security and operational matters, rather than multiple parties successively reassessing the same material. While Western Power and AEMO would continue to have distinct responsibilities, a clearer delineation of review responsibilities and greater reliance on assessments already completed by the responsible agency could materially reduce administrative burden without compromising power system security.

More broadly, Alinta Energy considers that the GPS framework should seek to avoid duplicate technical assessments wherever possible and instead focus regulatory effort on areas where the expertise or statutory role of each agency is genuinely distinct.

Consultation Paper – Curtailment prioritisation framework

While we support a curtailment prioritisation framework based on the principle of curtailing causers first we note that curtailment should remain a temporary, last-resort measure to manage an immediate power system security risk. It should not become a substitute for timely network investment or procurement of system strength services where a forecast shortfall has been identified.

Where curtailment occurs there should be transparent and clear justification.

Exposure Draft Part 1– Retrospective application of Technical Requirements

We oppose proposed clause 3A.5.1B. Requiring a Relevant Generator Modification to be assessed against the Technical Requirements in force at the time would create significant regulatory uncertainty for existing generators and may require reassessment against requirements that were introduced many years after the facility connected, despite those requirements having little or no relevance to the modification being proposed.

The proposed approach also contrasts with the framework adopted in the NEM. Under the

NER, generator modifications are generally assessed by considering the impact of the modification on the generating system's existing performance standards and connection arrangements, rather than requiring compliance with all subsequently introduced technical requirements. This recognises that generators have already established their connection rights and negotiated performance standards, while still allowing the Network Service Provider and AEMO to assess the consequences of the modification itself.

Requiring reassessment against subsequently introduced Technical Requirements may also discourage participants from undertaking upgrades that would otherwise improve reliability, compliance, control performance or security outcomes, because relatively minor modifications could trigger extensive reassessment activities with uncertain outcomes.

We also recommend that Existing Transmission Connected Generating Systems that are still progressing through the transitional GPS registration process under the current framework not be required to register or negotiate compliance with newly introduced Technical Requirements as part of that process. These facilities are already engaged in a substantial and resource-intensive exercise to establish and agree their Registered GPS based on their historical performance and existing obligations.

Exposure Draft Part 1 - Requirements based on facility maximum capability

Under the current framework, reactive power obligations are specified by reference to the maximum active power capability of the generating system as a whole. For modular facilities, like reciprocating engines, this can produce disproportionate outcomes when only a subset of units is operating, as the facility may be required to demonstrate reactive capability against the aggregate capability of all installed units rather than the capability of the units actually in service.

While this issue is not introduced by the proposed amendments, we note that with the reactive power capability provisions in Part A12.3 being amended, there is an opportunity for it to be resolved.

We recommend that the requirement is instead specified by reference to the aggregate maximum active power capability of the generating units operating at the relevant time, or alternatively establishing operating-mode-specific reactive capability requirements that reflect credible combinations of units in service. This would better align the requirement with the physical capability of the plant while maintaining the intended performance outcome at the Connection Point.

More broadly, where Technical Requirements are expressed as a percentage of a facility's maximum capability, consideration should be given to whether the reference quantity appropriately reflects modular generation technologies. This would improve the practical application of the GPS framework without reducing the underlying performance standards expected by Western Power and AEMO.

Exposure Draft Part 2 – Amending rules to establish a SWIS System framework

We support these proposed amendments in principle.

Procurement arrangements should be technology-neutral and provide a level playing field between network and non-network solutions, including opportunities for market participants to provide services through synchronous condensers, retrofitted generation assets and other emerging technologies.

Western Power should be able to transparently justify the basis for where it opts to use

network solutions rather than tendering for non-network solutions. Where a shortfall is identified and proposed to be resolved, there should be appropriate consultation as to how to resolve this – whether through network augmentation or an NCESS.

While a ten-year planning horizon is appropriate for identifying emerging risks, forecast system strength shortfalls later in the planning horizon may be highly dependent on uncertain assumptions regarding future generation, storage, transmission developments and retirements. We recommend Western Power only be required to alleviate a forecast shortfall where it is reasonably likely to materialise and where action is reasonably required at that time having regard to the lead time of the relevant solution. This would avoid premature investment based on uncertain forecasts while still ensuring sufficient time for efficient solutions to be delivered where a genuine need exists.

We consider there should be consultation on the System Strength Report. This would be consistent with consultation on the Transmission System Plan and the role performed by AEMO's Transition Plan for System Security in the NEM. Given the importance of the System Strength Report in driving future procurement decisions, stakeholders should have an opportunity to review and comment on identified shortfalls and potential solutions before the Report is finalised.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please contact me at oscar.carlberg@alintaenergy.com.au.

Yours sincerely,

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