

29 September 2026

Attn: Dora Guzeleva
Director, Wholesale Markets
Energy Policy WA
Level 1, 66 St Georges Terrace
Perth WA 6000

Dear Ms Guzeleva,

Power System Security and Reliability Standards Review – Exposure Draft & Consultation Paper

Thank you for the opportunity to comment on Energy Policy WA's Consultation Paper on the Power System Security and Reliability (**PSSR**) Standards Review released on 20 August 2026.

APA appreciates the work undertaken to date to consolidate and update the PSSR frameworks and technical standards applicable to the South-West Interconnected System (**SWIS**) in Western Australia.

The attachment to this letter provides APA's response to the proposals put forward by Energy Policy WA.

Should you have any questions or wish to discuss our submission please contact Liz Gharghori on 0498 444 045 or Liz.Gharghori@apa.com.au.

Yours sincerely,



Lizzie O'Brien
Senior Regulatory Manager
Regulation and External Policy



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Regulatory incentives

Energy Policy WA proposal	APA response
Proposal 1:1 New Electric Storage Resources (ESR) seeking to connect in network regions identified in the System Strength Report as having low system strength will be required to meet Grid-forming (GFM) inverter technical standards.	N/A
Proposal 1:2 For new ESR connecting outside locations identified as low system strength regions in the System Strength Report, the existing connection framework will continue to apply, with current “do no harm” provisions remaining in effect.	N/A
Proposal 1:3 Consistent with operational practices under provisions in the ESM Rules, if a System Strength Report identifies a system strength shortfall, AEMO may apply operational constraints informed by relevant Limit Advice. This may result in output limitations, including curtailment, for affected ESR proponents (refer to proposal 1:4 below).	N/A
Proposal 1:4 The ESM Rules will prescribe a curtailment prioritisation framework to manage system strength in network regions with low system strength, under which facilities will be prioritised for curtailment as follows: Facilities operating in non-compliance with their Registered Generator Performance Standard (GPS), if that non-compliance is causing a PSSR impact that cannot otherwise be managed without curtailment; ESR located in regions identified in the System Strength Report as experiencing low system strength, that have not converted to GFM capability, or otherwise remediated their system strength impacts;	Regarding proposed Priority 3, targeting existing facilities in non-compliance with electromagnetic transient (EMT) model submission requirements, there may be valid reasons why a facility has not been able to provide an EMT model, e.g., unavailability of qualified consultants to undertake modelling. We consider this priority should take the specific circumstances for the non-compliance into account. We have made additional comments on EMT model submission below. It is possible that some facilities will have connected to the SWIS prior to an area becoming impacted by low system strength. These facilities could face a significant burden if they are subject to curtailment due to low system strength developing over time. The priorities should

Consistent with operational practices under provisions in the ESM Rules, if a System Strength Report identifies a system strength shortfall, AEMO may apply operational constraints informed by relevant Limit Advice, which may result in output limitations, including curtailment, for affected ESR proponents. 3. If practical, existing facilities in non-compliance with electromagnetic transient (EMT) model submission requirements (refer to Proposal 3:1); and 4. When curtailment of facilities under items 1, 2 and 3 is insufficient to address the identified system strength shortfall or associated power system security risk, other facilities in the affected region may be subject to operational limits or curtailment, in accordance with the relevant Limit Advice and implemented through applicable Constraint Equations. Notwithstanding these prioritisation principles, the overarching principle will be the maintenance of power system security.	recognise the potential impact to existing facilities and consider whether a compensation mechanism is appropriate should these facilities face curtailment.
Proposal 1:5 When two or more facilities are tied in a curtailment scenario, the tie will be resolved in accordance with high-level principles set out in the ESM Rules and a method detailed in a WEM Procedure, such as the application of relevant coefficients.	It is not clear from the Consultation Paper what is meant by “relevant coefficients”. It would be helpful to explain this further.

Technical requirements for ‘hybrid systems’

Energy Policy WA proposal	APA response
Proposal 2:1 The ESM Rules will prescribe that hybrid systems are assessed for Generator Performance Standard (GPS) as integrated systems at the Connection Point or, where applicable at its Measurement Point. Compliance will be based on the combined performance of all sub-systems and operating modes covering all credible combinations	N/A



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Energy Policy WA proposal	APA response
that could materially affect power system security, result in adverse interactions between sub-systems, or mask the true performance of the facility. Under this framework, GFM capability will be assessed at a sub-system level, but the overall facility may be assessed as either GFM or grid-following (GFL) when considered as an integrated system across the credible operating-modes. The assessment methodology will be outlined in a WEM Procedure.	
Proposal 2:2 Compliance requirements per operating-mode Compliance will be assessed using an integrated system model and assessed across credible operating modes that materially affect performance, against the associated compliance obligations at the Connection Point or, where applicable, the Measurement Point. The operating-mode requirements will define which sub-systems are available at a point in time, the available active and reactive (power/current) headroom, the expected connection point response, any operational constraints being invoked and the compliance pathway relied upon. The credible operating modes may include both sub-systems online, GFM-only operation, GFL-only operation where credible, ESR charging and discharging, low state of charge, and high active-power export with limited current headroom.	See comments regarding timing on Proposal 2.4, below.
Proposal 2:3 Registered GPS structuring A flexible framework will be applied for the allocation and structure of GPS for hybrid systems, reflecting the extent to which sub-systems materially and independently influence performance at the Connection Point or, where applicable, the Measurement Point. The framework will identify the likely GPS structure based on the technical evidence. The GPS structure will include either:	APA supports DEED's approach to provide flexibility in selecting the appropriate GPS structure for hybrid systems. APA's view is that the chosen structure must be practical from the perspective of implementing the Generator Monitoring Plan (GMP). The GMP is the document that brings the GPS to life in terms of testing the facility's capability and ongoing compliance with the GPS. Whatever GPS structure is selected, it must be translatable to the GMP format and enable clear pathways to demonstrate compliance through testing and monitoring.



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• a single Registered GPS supported by sub-system evidence; • a single Registered GPS supported by structured annexures; or • multiple Registered GPSs, when this is necessary to reflect material and independent sub-system influence on Connection Point or, where applicable, Measurement Point performance.	
Proposal 2:4 Timing of assessment For new project development the hybrid system assessment and classification will be undertaken at the R0 stage in the connection process. For staged developments or retrofit projects, the relevant assessment will occur at the earliest practicable modification assessment stage associated with the proposed GFM addition. As outlined in Proposal 2:1, a WEM Procedure will provide the details for the assessment methodology, technical requirements and evidentiary requirements.	APA suggests that for many project proponents, R0 is too early in the process for the hybrid system assessment and classification. Many project proponents will not have selected a vendor at the R0 stage, making the assessment impossible. We consider R1 to be the more appropriate stage to mandate the assessment to take place. That said, if a project proponent is ready to undertake the assessment at R0, they should not be prevented from doing so.

Provision for submission of EMT models by existing facilities

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Proposal 3:1 Market Participants responsible for Transmission-connected Generating System with a Nameplate Rating of 10 MVA or greater will be required, upon request from the Network Operator, to obtain and provide adequate EMT models to support system studies. The Network Operator will specify timeframes for the provision of the EMT models, with flexibility to prioritise and stage requests based on system strength risks and broader power system security considerations.	APA broadly supports the proposal for Western Power to seek EMT models, subject to cost reimbursement, particularly as the SWIS continues to evolve. Further detail is required on what will be expected from Market Participants: • Will the EMT model development rely on a Facilities' existing R2 testing and model validation? • Is additional site testing required? • Will a Releasable User Guide (RUG) be required, and if so, will a template be provided such as exists for the NEM?
Proposal 3:2 The Network Operator will be required to reimburse a Market Participant's reasonable costs for the development of the EMT models.	APA strongly supports the proposal that Market Participants are reimbursed for development of the EMT models, however we require further detail on what is meant by "reasonable costs". Market Participants are likely to face internal and external costs to undertake EMT modelling, which will not have been captured in CAPEX forecasting that typically occurs a year in advance. There is significant uncertainty as to what will be required for the EMT modelling, as outlined in our response to Proposal 3.1, and these factors will significantly impact the costs incurred (e.g., lost generation revenue, consultant fees, participant staff time).
Proposal 3:3 The provisions requiring a Market Participant to provide an EMT model for an existing facility within specified timeframes will be a civil penalty provision.	The "specified timeframes" must be reasonable, taking into account factors such as the lack of existing EMT model, the level of effort required from the Market Participant, and the limited number of specialist consultants that can be engaged to undertake the work. A Market

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	Participant should be able to challenge the specified timeframe and seek an extension where they are unable to comply. This links back to our comments on Proposal 1.4, above, where there may be valid reasons why a Market Participant is in non-compliance with a request to provide an EMT model, and this should be noted for curtailment decisions.

Framework for control settings changes

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Proposal 4:1 Introduce new terms that distinguish between Registered GPS capability and operational settings: - Registered capability – the fundamental technical capability of a facility approved under the Registered GPS; and - Operational settings – control parameters that may be adjusted over time to suit system or regional conditions, while remaining within the approved capability. The ESM Rules will include provisions to enable Western Power to review and require changes to new and existing facility control settings (beyond the existing scope for voltage control settings) when required to address system strength or related power system impacts. A WEM Procedure will outline the process for requiring changes, including when these requirements would be triggered and any consultation that may be required.	APA appreciates that distinguishing between “registered capability” and “operational settings” aims to provide a flexible approach to managing power system security issues. However, we are concerned about the potential for Western Power to require changes to a facility’s control settings that may in turn require costly plant or system changes. In such circumstances, will the User be responsible for the costs or will these be borne by Western Power? In scenarios where the control settings changes require GPS amendments, the amendments should be strictly limited to the impacted elements of the GPS and must not be taken as an opportunity to seek other changes to the GPS, unless expressly agreed by the User, Western Power, and AEMO.