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Via email: energymarkets@deed.wa.gov.au

Dear Ms Guzeleva

RE: Power System Security and Reliability (PSSR) Standards review

Collgar Renewables (**Collgar**) welcomes the opportunity to provide feedback on the August 2026 PSSR Standards Review papers. We support the outlined by Energy Policy WA (**EPWA**), particularly the requirement for existing Market Participants to provide EMT models and the framework for consequential control setting changes. Collgar considers that the proposals are a significant improvement on existing PSSR standards, and materially align with other jurisdictions.

While the papers address several matters raised previously, we consider the review presents an opportunity to address material issues already affecting the SWIS, particularly the operational impacts of existing system strength shortfalls on connected Market Participants.

Minimum System Strength

The proposed framework establishes minimum system strength requirements and forecasting obligations at Transmission Nodes¹. Further consideration should be given to safeguarding the long term stable operation of existing connected facilities. The proposed standards should explicitly account for the system strength requirements of existing facilities when establishing minimum network-level standards, ensuring sufficient system strength is maintained to support their continued stable operation. The framework should also establish clear accountability and timeframes for AEMO and Western Power for addressing identified shortfalls.

Proposed clauses 4.5D.3–4.5D.7 require AEMO to identify minimum fault levels and Short Circuit Ratio (**SCR**) requirements at each Transmission Node. The definition of a shortfall also considers the

¹ Specifically, Clauses 4.5D.3((b), 4.5D.4 and 4.5D.7.

ability to maintain a stable voltage waveform for forecast Inverter Based Resource (**IBR**). When new IBR enter the system, the fault level is shared between the existing and new IBR reducing stable operations for both facilities. There is no explicit facility-specific obligation to preserve existing generators' registered operating envelopes.

Proposed clause 4.5D.1 requires AEMO to prepare and publish a System Strength report every two years but does not expressly identify when the first reporting year is. AEMO has previously identified existing areas of system strength shortfalls in prior Electricity Statemen of Opportunities (**ESOO**) publications. We advocate that AEMO expedites the initial report given existing system strength concerns have been published for several years.

Proposed clause 2.2C.1(cC) obliges Western Power to alleviate forecast System Strength Shortfalls through network reinforcement or non-network solutions. However, the drafting does not establish an absolute operational floor, a specific remediation deadline for an existing shortfall, or a remedy for affected existing facilities.

Do-no-harm

The existing principle in clause 3A.5.17(c) Electricity System and Market (ESM) Rule requires the Network Operator to reject a proposed Negotiated GPS where it considers the standard will adversely affect PSSR or Power Transfer Capability.

Collgar considers that the existing do-no-harm principal should be strengthened to ensure new IBR connections do not adversely affect existing connected facilities through reduced system strength, increased instability or additional curtailment. Where such impacts are identified, responsibility for mitigation should be clearly allocated.

As identified by AMEO in prior ESOOs, the Merredin Region has experienced material deterioration in network stability, including increased oscillations and operational restrictions associated with changing network conditions and the connection of additional generation in the region. This highlights the risk of new connections compromising the stable operation of existing facilities, particularly those not originally designed or assessed against the resulting lower system strength conditions. It is our view that the current principals have not proven to be adequate in safeguarding the continued stable operation of existing facilities as additional IBRs connect to the network.

Economic cost of curtailment:

Western Power's investment planning framework should explicitly quantify the forecast economic cost of system-strength-related curtailment, including foregone generation and associated market costs, and incorporate these costs when assessing and prioritising network reinforcement and non-network solutions.

EMT model reimbursement (Proposal 3:2)

Collgar supports the proposal. Further guidance is required on reasonable costs, including eligible development and validation expenses, physical testing, cost approval, reimbursement timeframes and dispute resolution.

Collgar thanks EPWA's ongoing work on Power System Security and Reliability and looks forward to continuing working on this important topic.

We would welcome the opportunity to discuss our operational experiences with EPWA and will reach out in due course to arrange a suitable time. Should you have any questions regarding this submission, please don't hesitate to contact me.

Kind regards

Jake Flynn

Regulatory and Trading Manager