

29 September 2026

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DEED CONSULTATION: POWER SYSTEM SECURITY AND RELIABILITY STANDARDS REVIEW CONSULTATION PAPER

Synergy welcomes the opportunity to provide feedback to the Department of Energy and Economic Diversification (**DEED**) on the *Power System Security and Reliability Standards Review Consultation Paper (PSSRS Consultation Paper)* released on 20 August 2026. Synergy acknowledges that the PSSRS Consultation Paper builds on policy outcomes from previous consultations conducted as part of the Power System Security and Reliability (**PSSR**) Standards Review being progressed by DEED, in consultation with the Australian Energy Market Operator (**AEMO**) and Western Power. Synergy sets out below an overarching matter for DEED's consideration and its detailed comments on the proposals in the PSSRS Consultation Paper in Annexure A.

1 FINANCIAL INCENTIVES FOR GRID-FORMING TECHNOLOGY

Proposals in the PSSRS Consultation Paper are focused on formation of a regulatory incentives framework to address system strength issues in the South West Interconnected System (**SWIS**) and aimed at encouraging facilities with Grid-forming (**GFM**) capability. Synergy is generally supportive of these proposals but notes the following in the PSSRS Consultation Paper:

*"While financial mechanisms have been used in other markets to influence participant behaviour and support system strength outcomes, DEED does not consider that financial incentives, to complement the proposed regulatory incentives, are required in the WEM."*¹

Synergy respectfully disagrees with this conclusion and additionally considers that the regulatory incentives proposed in the PSSRS Consultation Paper, if implemented on their own may have unintended consequence.

Firstly, the proposed regulatory incentive allowing only GFM capable Electric Storage Resources (**ESRs**) to connect in regions of low system strength, on its own provides no motivation for developers to build ESRs in these locations. Combined with the regulatory incentives which effectively penalise Grid-following (**GFL**) ESRs, the overall effect may be to disincentivise further ESR investments in the SWIS.

Secondly, it is unclear at this stage if the regulatory incentives proposed within the PSSRS Consultation Paper will be sufficient to encourage GFL to GFM capability conversion. Investors generally prioritise ventures that maximise return on investments. If the cost of curtailments does

¹ [PSSRS Consultation Paper, p. 20.](#)

not sufficiently outweigh the additional investment outlay and financing costs required for GFL to GFM conversion, the proposed curtailment prioritisation framework could have limited influence in addressing system strength shortfalls.

Synergy acknowledges that designing and implementing financial incentives to complement the proposed regulatory incentives will be a complex endeavour and require balancing. However, Synergy considers that financial incentives for GFM technology will be important to enable proactive management of system strength in the SWIS and therefore reiterates its call for consideration towards their development²³.

2 CONCLUSION

Synergy appreciates the complex nature of the work being undertaken by DEED under the PSSR Standards Review and encourages further engagement with stakeholders to ensure the development of a consistent, single, end-to-end PSSR Standards and a PSSR Standards framework that are consistent with the State Electricity Objective.

Synergy thanks DEED for its work to date on the Wholesale Electricity Market reform program and looks forward to continued consultation on market reform matters.

Your sincerely

KATHERINE LAU
ACTING MANAGER ELECTRICITY MARKETS

² [Synergy submission PSSR Standards Review – Western Power Consultation Paper, dated 11 November 2025.](#)

³ [Synergy submission – PSSR Standards Review Consultation Paper, dated 7 August 2025.](#)

ANNEXURE A: DETAILED COMMENTS ON THE PROPOSALS AS OUTLINED IN THE PSSRS CONSULTATION PAPER

Proposal 1

Question 1(a)

If stakeholders do not support mandating GFM inverter technical standards for new ESR in network locations identified as experiencing existing or forecast system strength shortfalls:

- What are the reasons for this position?
- What evidence or analysis supports the position?

Response

Synergy is generally supportive of mandating GFM inverter technical standards for new ESRs in network locations identified as experiencing existing or forecast system strength shortfalls. However, as discussed in the attached cover letter, Synergy suggests that financial incentives for GFM technology should be implemented alongside the proposed regulatory incentives to address system strength concerns.

Question 1(b)

If stakeholders do not support the proposed prioritisation framework as a mechanism to manage system strength conditions where existing ESR have not remediated their impacts:

- What are the reasons for this position?
- What evidence or analysis supports the position?

Response

Synergy considers that further details are required before it can form a position on the proposed curtailment prioritisation framework. The matters Synergy seeks clarification on are below.

Existing ESR facilities

The curtailment framework proposes that AEMO may apply operational constraints, informed by relevant Limit Advice, on ESR facilities that are in locations experiencing low system strength that have not converted to GFM capability. Such curtailment will lead to some level of regulatory pressure on Market Participants to convert their ESR facilities.

Conversion of an existing ESR facility from GFL to GFM technology is a complex engineering and technological exercise which will require support from the relevant Original Equipment Manufacturers (**OEMs**). However, original agreements with OEMs for ESR facilities that were built to operate as GFL systems would likely not have contemplated requiring support for conversion to GFM capability. Therefore, Market Participants incentivised to convert their facilities to GFM capability will have to contend with the complexities of renegotiating agreements with the relevant OEMs and securing their buy-in as part of the conversion process.

Additionally, the change from GFL to GFM capability will require additional financial outlay which would not have been contemplated when the original project financing requirements for an ESR facility were established. Market Participants seeking to convert their ESR facilities to GFM technology will also have to contend with the challenges of sourcing additional funding when their facility is already experiencing a loss of revenue due to being curtailed (based on not being of GFM capability). Cumulatively, these could negatively impact the financial viability of a Market Participant.

Synergy therefore seeks clarification if the above matters have been considered and would welcome information on how investments in existing ESRs of GFL technology can be protected from devaluation within this curtailment prioritisation framework.

Legacy synchronous generators

Clarification is required on whether there is intention to include or exclude legacy synchronous generating units and systems in this curtailment prioritisation framework. On this aspect, Synergy requests consideration of the following:

- There are several synchronous generators in the SWIS which support system strength but are also known to have inherent and software system limitations preventing compliance with the technical requirements in *Appendix 12: Transmission Connected Generating System Generator Performance Standards* in the ESM Rules. Furthermore, a number of these legacy synchronous generators no longer have OEM access and have no support to develop resolution for these GPS non-compliance issues.
- These synchronous generators are coming to the end of their useful life, with expected retirement in the next five years. Even if solutions were developed to enable GPS compliance, further investment in these facilities at this stage would likely be commercially impracticable.

Given the above, Synergy requests clarification if an exemption from the curtailment prioritisation framework is being considered for synchronous generating units and systems faced with the above conditions.

Collateral damage

Item 4 of the curtailment prioritisation framework is proposed as:

Proposal 1

*"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 (emphasis added) ..."*⁴

Synergy seeks to understand how a facility; that may be one of multiple facilities in a location that is experiencing system strength shortfall or associated power system security risk; but is itself not contributing to the shortfall or risk, will not be penalised by curtailment under item 4.

If a facility that is already supporting system strength in a region, e.g. a synchronous generator or a facility that has not been curtailed under items 1 to 3, is curtailed under item 4 this would result in the system strength in the region further deteriorating and also unwarranted curtailment of a facility that is in compliance with the other items of the framework.

Tie-breaking arrangement

Further details on the tie-breaker method that would apply when two or more facilities are tied in a curtailment scenario is requested, for example, how the proposed coefficient will be derived. Synergy also seeks to understand how the economic dispatch of facilities could be impacted by the tie-breaking arrangement.

Operational/system strength constraints

Synergy also requests further information on the methodology that will be used to develop the operational/system strength constraints referenced in item 2 of the proposed curtailment prioritisation framework

Proposal 2

Question 2(a)

If stakeholders do not support the proposed approach to assess hybrid systems at the Connection Point or, where applicable, the Measurement Point, supported by structured sub-system capability assessments, an operating mode matrix and GPS structuring:

- What are the reasons for this position?
- What evidence, analysis or practical experience supports the position?

Response

Synergy is supportive of this proposal on the basis that it is only applicable to hybrid systems as described in the PSSRS Consultation Paper:

*"...a collection of IBRs combining both GFL and GFM technologies, excluding loads, that are assessed as a single integrated entity."*⁵

Synergy acknowledges that overall facility assessments may, under certain circumstances, be needed for hybrid systems along with assessments at sub-system level. In such situations, there should be consideration towards only requiring the essential additional testing to avoid unnecessary exhaustion of financial and human resources.

Synergy also considers that the current structure of Registered GPS is not suited to hybrid systems and a different structure is warranted. It is recommended that there is early engagement with hybrid system proponents to identify the appropriate Registered GPS structure and confirm the implementation timeline to avoid or minimise the need for GPS rework.

Question 2(b)

Do stakeholders consider that the Relevant Generator Modification process set out in Chapter 3A of the ESM Rules provides a sufficient framework for assessing retrofit configurations to existing facilities?

Response

Synergy suggests the following with regards to the Relevant Generator Modifications (**RGM**) process in Chapter 3A of the ESM Rules:

- If it is deemed appropriate that facility modifications for the purpose of GFL to GFM capability conversion are to come under the RGM process, Synergy suggests that this should be clearly specified in the ESM Rules to avoid potential confusion that new GPSs are required for all Technical Requirements applicable to the facility being converted.
- The current RGM process requires Market Participants to submit Proposed Generator Performance Standards and proposed Generator Monitoring Plans, along with supporting evidence, if the Network Operator declares a Potential Relevant Generator Modification to be a RGM. However, there are no specified timeframes within which the assessment and approval of these documents need to be completed. This creates significant uncertainty for Market Participants when trying to plan and schedule works to implement facility modifications and can lead to significant project delays. Further, given the

⁴ [PSSRS Consultation Paper, p. 21](#)

⁵ [PSSRS Consultation Paper, p. 22](#)

proposed curtailment framework (refer to Proposal 1 of the PSSRS Consultation Paper), the lack of clarity and accountability on the assessment timeframes within the RGM process could also result in extended curtailments even when a Market Participant is genuinely committed to converting its facility to GFM technology going forwards. Hence, Synergy suggests that assessment timeframes are clearly defined in the RGM process in Chapter 3A.

- Lastly, Synergy requests consideration of whether a fast track assessment process can be established within Chapter 3A for facilities converting from GFL to GFM capability.

Proposal 3

Question 3(a)

If stakeholders do not support requiring EMT models from existing facilities based on system strength risks and broader power system security considerations:

- What are the reasons for not supporting the proposal.
- What evidence, analysis or practical experience that justify this position.

Response

Synergy is generally supportive of the requirement for existing facilities to provide Electromagnetic Transient (EMT) models to the Network Operator. Synergy understands that the EMT models from existing facilities would aid the Network Operator to ensure accuracy in their forecasting activities and support efforts to ensure secure operations of the SWIS. However, Synergy does not support the proposal to make this requirement a civil penalty provision.

As acknowledged in the PSSRS Consultation Paper, some existing facilities were not originally designed with EMT modelling requirements in mind, consist of control systems that are bespoke and are without robust documentation⁶. Further, for some of these existing facilities, OEM support is no longer available and will have to be renegotiated for, or the OEMs no longer exist. This means that sourcing of the information required to form the EMT models will be challenging and Market Participants of these facilities will struggle to comply with the requirement to provide EMT models to the Network Operator. Synergy also requests consideration of the fact that some SWIS facilities have been slated for retirement within this decade and therefore; to require EMT models be developed for these facilities would be a significant imposition with very limited benefit from a system studies perspective. Due to the above considerations, Synergy is unable to support the requirement to provide EMT models to the Network Operator being classified as a civil penalty provision.

Lastly, Synergy would appreciate clarification on the phrase 'existing facility' and particularly if it refers only to facilities that had a fully executed access arrangement from 1 February 2021.

Question 3(b)

If stakeholders do not support the proposed approach to introduce a cost compensation mechanism for EMT model development for existing facilities:

- What are the reasons for not supporting the proposal.
- What evidence, analysis or practical experience that justify this position.

Response

Synergy is supportive of the proposal for a cost compensation mechanism for EMT model development for existing facilities. Synergy suggests that there is consultation with Market Participants to establish the types of recoverable costs for EMT model development, and also the criteria for determining the level of costs that will be deemed "reasonable" within this compensation mechanism.

Question 3(c)

If stakeholders do not support the use of curtailment, where practical, in accordance with the curtailment prioritisation framework (refer to Proposal 1.4), where a Market Participant is non-compliant with EMT model submission requirements:

- What are the reasons for not supporting the proposal.
- What evidence, analysis or practical experience that justify this position.

Response

Synergy does not support this proposal to curtail facilities where a Market Participant is non-compliant with EMT model submission requirements due to the reasons set out in our response to Question 3(a) above.

⁶ [PSSRS Consultation Paper, p. 30](#)

Proposal 4

Question 4(a)

If stakeholders do not support the proposed approach to enable changes to control settings to support system strength:

- What are the reasons for this position?
- What evidence, analysis or practical experience supports the position?

Response

Synergy is generally supportive of this proposal and suggests that the performance standards for the operational settings be appropriately documented.

Question 4(b)

Are there particular control, protection or performance settings that should be included or excluded from the scope of the proposal?

Response

No comment.

Question 4(c)

Do stakeholders consider there are any practical, technical, or commercial challenges associated with requiring changes to control settings under the GPS framework?

Response

Synergy reserves comment on this question until further details are available regarding the proposed Western Power provisions and WEM Procedure.

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DEED CONSULTATION: POWER SYSTEM SECURITY AND RELIABILITY (PSSR) STANDARDS REVIEW: EXPOSURE DRAFT PROPOSED ELECTRICITY SYSTEM AND MARKET (ESM) AMENDING RULES

Synergy welcomes the opportunity to provide feedback to the Department of Energy and Economic Diversification (**DEED**) on its publication *Power System Security and Reliability (PSSR) Standards Review: Exposure Draft Proposed Electricity System and Market (ESM) Amending Rules (PSSRS Draft Rules)* released on 20 August 2026.

DEED, in consultation with the Australian Energy Market Operator (**AEMO**) and Western Power, have continued progressing the Power System Security and Reliability (**PSSR**) Standards Review for the South West Interconnected System (**SWIS**). The PSSRS Draft Rules are intended to implement the review outcomes of proposals 12 to 16 (consultation in June 2025¹) and proposals 6 to 11 (consultation in December 2025²) from the PSSR Standards Review. Synergy understands that these review outcomes are aimed at reducing connection barriers for inverter-based technologies and establishing a system strength framework for the SWIS.

Synergy sets out below an overarching matter for DEED's consideration and provides its detailed comments on the PSSRS Draft Rules in the attached tables.

1 PRE-IMPLEMENTATION MEASURES

It was advised at the Transformation Design and Operation Working Group Meeting (**TDOWG**) held on 10 September 2026, that Western Power would be publishing a GPS Technical Requirement Guideline, GPS Submission Template and GPS Report Template (**supporting documents**) prior to the commencement of the amended Electricity System and Market Rules (**ESM Rules**) resulting from the PSSRS Draft Rules. The supporting documents are aimed at providing guidance on the new technical requirements and standardising Generator Performance Standards (**GPS**) documentation.

Synergy requests that Market Participants are afforded the opportunity to provide feedback and seek clarification on the content of these supporting documents before they are published. Synergy also requests consideration that Market Participants be given a reasonable amount of time to implement any necessary administrative changes prior to the commencement of the amended ESM Rules.

¹ [Power System Security and Reliability \(PSSR\) Standards Review Consultation Paper.](#)

² [Power System Security and Reliability Standards Review – Proposals 6 to 11.](#)

2 CONCLUSION

Synergy appreciates the complex nature of the work being undertaken by DEED under the PSSRS Standards Review and looks forward to further engagement with stakeholders to ensure development of a consistent, single, end-to-end PSSR Standards and a PSSR Standards framework that is consistent with the State Electricity Objective.

Synergy thanks DEED for its work to date on the Wholesale Electricity Market reform program and looks forward to DEED's continued consultation on market reform matters.

Yours sincerely

KATHERINE LAU
ACTING MANAGER ELECTRICITY MARKETS

Table 1: Comments on Part 1 – Amending Rules to clarify Technical Requirements for connecting inverter-based technologies

Synergy's comments on Part 1 – Amending Rules to clarify Technical Requirements for connecting inverter-based technologies				
#	Rule ref.	Classification	Issue	Suggestion
1	3A.5.1A	Moderate	Synergy suggests that the Proposed Generator Performance Standards submitted in relation to generating works intending to connect to a transmission system should be assessed against the Technical Requirements that were in force at the time the application to connect the generating works was made. Changes to the Technical Requirements after the submission of the Proposed Generator Performance Standards related to connection of generating works may render invalid the original feasibility considerations and underlying rational that were the basis of the Proposed Generator Performance Standards and therefore, would not be the appropriate reference against which the assessment is conducted.	3A.5.1A If the Technical Requirements are amended after the date on which a Market Participant submits Proposed Generator Performance Standards under clause 3A.5.1, the Network Operator must assess the Proposed Generator Performance Standard under this section clause 3A.5 using the Technical Requirements that were are in force at the time the application to connect the generating works was submitted. of the assessment, unless: (a) an Arrangement for Access that relates to the relevant Transmission Connected Generating System has been executed by all relevant parties before the date on which the Technical Requirements are amended and the Market Participant has included a copy of the executed Arrangement for Access, in which case: i. the Network Operator must assess the Proposed Generator Performance Standard against the Technical Requirements that were in force at the date of execution of the Arrangement for Access; or ii. if the Market Participant and the Network Operator agree that the amended Technical Requirements should apply, the Network Operator must assess the Proposed Generator Performance Standard under this clause 3A.5 using the Technical Requirements that are in force at the time of the assessment.
2	3A.5.1B	Moderate	Synergy considers that a Proposed Generator Performance Standard submitted under clause 3A.14.1(a) should be assessed using the Technical Requirements that were in force at the time the Potential Relevant Generator Modification (PRGM), that has been declared a Relevant Generator Modification, was submitted. Changes to the Technical Requirements after the submission of a PRGM may render invalid the original feasibility considerations and underlying rational that resulted in the PRGM being submitted and therefore, would not be the appropriate reference against which the assessment is conducted.	3A.5.1B If a Market Participant responsible for a Transmission Connected Generating System submits a Proposed Generator Performance Standard under clause 3A.14.1(a), the Network Operator must assess the Proposed Generator Performance Standard under this clause 3A.5 using the Technical Requirements that were in force at the time the Network Operator notified the Market Participant submitted the that a Potential Relevant Generator Modification that has been declared by the Network Operator to be a Relevant Generator Modification in accordance with clause 3A.13.7.
3	Glossary	Typographical	Synergy suggests typographical amendments to the Glossary section.	11. Glossary Negotiated Access Standard: Means a s s standard or technical level of.... Proposed Negotiated Access Standard: Means a Proposed Generator Performance Standard Proposed Negotiated Access Standard that is not an Automatic Access Standard but is no less than the Minimum Access Standard.

Synergy's comments on Part 1 – Amending Rules to clarify Technical Requirements for connecting inverter-based technologies

#	Rule ref.	Classification	Issue	Suggestion
4	A12.1	Moderate	The Explanatory Note for proposed amendments to section A12.1. states: “..the amended definition for the term ‘Adequately Damped’ is clarified to apply only to Synchronous Generating Systems, Synchronous Generating Units or the power system as applicable.” However, Synergy notes that the revised definition of “Adequately Damped” references the terms “Generating Unit” and “Generating System” which can be interpreted to also encompass Asynchronous Generating Units and Asynchronous Generating Systems. Given this possible interpretation, Synergy suggests the following typographical amendments to the definitions of the term “Adequately Damped”.	<u>A12.1. Definitions</u> Adequately Damped: The response of a Synchronous Generating Unit, Synchronous Generating System or the power system, as applicable, following an oscillation triggered by any Disturbance must conform to the following criteria: (a) the damping ratio of the oscillation must be at least 0.1; (b) the halving time of any oscillation is not to exceed 5 seconds; and (c) allow other Generating Systems or Generating Units, as applicable to maintain Continuous Uninterrupted Operation.
5	A12.4.2.9.	Clarification	Synergy requests clarification on whether the reference to clause A12.4.3.10 in clause A12.4.2.9 is accurate. Synergy notes that clause A12.4.2.9 is under the sub-heading “All Generating Systems” in section A12.4.2, whereas clause A12.4.3.10 is under the sub-heading “Asynchronous Generating Systems” in section A12.4.3.	
6	A12.4.2.9A.	Clarification	Synergy requests clarification on whether the reference to clause A12.4.3.10 in clause A12.4.2.9A is accurate. Synergy notes that clause A12.4.2.9A is under the sub-heading “All Generating Systems” in section A12.4.2, whereas clause A12.4.3.10 is under the sub-heading “Asynchronous Generating Systems” in section A12.4.3.	
7	A12.4.3.6A.	Minor	Since A12.4.3.6A is to apply to Synchronous Generating Systems, Synergy suggests that the clause should reflect the fact that the control systems of Synchronous Generating Systems are less flexible and ‘programmable’ than the control systems of Asynchronous Generating Systems due to technological limitations. Therefore, Synergy suggests the following amendments to clause A12.4.3.6A to acknowledge this limitation.	<u>A12.4.3.6A.</u> The Generating System must should, as far as reasonably practicable for its technology, and in consultation with the Network Operator, have Equipment capabilities and Control Systems sufficient to ensure that: ...
8	A12.5.1.8	Minor	Synergy notes new clause A12.5.1.8 which explicitly confirms that Active Power excursions experienced by Asynchronous Generating Units or Systems resulting from an inherent pre-programmed response and which opposes RoCoF or voltage phase angle jumps will not be taken to be a breach of the requirements of the ESM Rules. Synergy requests consideration that similar explicit exclusions be afforded Synchronous Generating Units or Systems in sections A12.6, A12.7, A12.9 and A12.10 of the ESM Rules when the Synchronous Generating Units or Systems are in primary frequency control mode, or an alternate control or protection function mode as per design of the Facility.	

Synergy's comments on Part 1 – Amending Rules to clarify Technical Requirements for connecting inverter-based technologies

#	Rule ref.	Classification	Issue	Suggestion
9	A12.8.2.1.	Moderate	Synergy suggests that a maximum nominal voltage threshold (0ms or Automatic Disconnection Threshold) should be established for protection of the network within clause A12.8.2.1 and proposes that this be defined in the ESM Rules as clause A12.8.2.1(a). Additionally, clause A12.8.2.1(e) is proposed to be removed from the ESM Rules. Synergy suggests that this clause should be retained for clarity and notes that a similar requirement for voltage to remain at 0% of nominal voltage for a specified period is being retained under clause A12.8.3.1(d) of the Minimum Access Standard for Disturbance Ride Through. Should the current period of no more than 450 ms after T(uv) as specified in clause A12.8.2.1(e) be no longer appropriate, Synergy suggests an alternative time period be established.	<u>A12.8.2.1.</u> A Generating System must maintain Continuous Uninterrupted Operation where a power system Disturbance causes the voltage to vary within the following ranges: (a) voltage does not exceed x% of nominal voltage after T(ov); (ai) (a) voltage exceeds 130% of nominal voltage for a period of at least 0.02 seconds after T(ov); ... (e) voltage remains at 0% of nominal voltage for no more than 450 milliseconds after T(uv); {Blank}
10	A12.8.3.1.	Moderate	Clause A12.8.3.1(a) is proposed to be removed from the ESM Rules. However, Synergy suggests that this clause specifying a maximum nominal voltage threshold (0ms or Minimum Disconnection Threshold) should be retained for network protection. Should the current threshold of 120% be considered no longer suitable, an alternate maximum nominal voltage threshold should be established.	<u>A12.8.3.1.</u> A Generating System must maintain Continuous Uninterrupted Operation where a power system Disturbance causes the voltage to vary within the following ranges: (a) voltage does not exceed 120% of nominal voltage after T(ov); {Blank}
11	A12.9.2.3. and A12.9.3.3.	Moderate	Synergy proposes that examples illustrating multiple disturbance ride through events under clause A12.9.2.3 and clause A12.9.3.3 would be useful to support Market Participants' interpretation of these clauses.	
12	A12.9A	Typographical	The following typographical amendment is suggested to clarify that section A12.9A applies exclusively to Asynchronous Generating Units and Asynchronous Generating Systems.	<u>A12.9A. Technical Requirement: Withstand Short Circuit Ratio for Asynchronous Generating Units and Asynchronous Generating Systems</u>
13	A12.9B	Typographical	The following typographical amendment is suggested to clarify that section A12.9B applies exclusively to Asynchronous Generating Units and Asynchronous Generating Systems.	<u>A12.9B. Technical Requirement: Voltage Phase Angle Jump for Asynchronous Generating Units and Asynchronous Generating Systems</u>

Table 2: Comments on Part 2 – Amending Rules to establish a SWIS System framework

Synergy's comments on Part 2 – Amending Rules to establish a SWIS System framework				
#	Rule ref.	Classification	Issue	Suggestion
1	A12.13.3.3A.	Moderate	New clause A12.13.3.3A requires Asynchronous Generating Systems with Grid-Following Capability to have an instability detection mechanism capable of identifying unstable operation or instability-related control interactions. The Network Operator will be responsible for producing guidelines on the performance requirements for the instability detection mechanisms. Synergy requests that Market Participants be afforded the opportunity to review and provide feedback on these guidelines at the appropriate time.	