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Energy Policy WA - By electronic submission energymarkets@deed.wa.gov.au.

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Submission: Power System Security and Reliability Standards Review Consultation Paper

We refer to the above document (the **Paper**).

Grid security and reliability are key and we must be sure that settings and performance criteria are articulated in such a way that the adoption of new technologies is not stifled, which would lead to a delayed transition and adverse cost outcomes.

The challenges faced by Western Australia's grid are unique and we must avail ourselves of all suitable technological options to address the challenges.

In this context, performance standards or guidelines are a better way to foster the development and adoption of new solutions, rather than highly prescriptive measures such as rules that quickly become outdated in the face of new emerging solutions.

Whilst we recognise the considerable effort expended in stakeholder liaison and preparation of the Paper we feel the approach is:

1. Too prescriptive without the flexibility to take advantage of current and emerging technology in a rapidly evolving market;
2. Fails to recognise the need for discussion, adjustment and dispensation for connecting specific vendor equipment at specific points in the network that is typically undertaken during the connection design and commissioning process (e.g. using the Generator Performance Standard process);
3. Too tightly defined on acceptable limits without recognising the real world inter-relationship between equipment parameters and the requirements of a specific application to determine how the guideline is applied to each facility e.g., vendor equipment design details, point of network connection and surrounds, and related functional and technical requirements, network services being offered by the proponent etc.;
4. Stifles innovation and acts as a road block to the energy transition by discouraging wide market participation and the full deployment of inverter-based resources in achieving the State's electricity objectives;
5. Weakens the proponents business case e.g., by restricting services available to be offered, reducing available equipment capacity, reducing functionality and related services etc;
6. Fails to build on the successful and flexible approach (and content) used on the National Electricity Market ^{Ref 1}.

Yours sincerely

Fraser Maywood

Chair, Sustainable Energy Now
Inc

Submission approved by the SEN Committee on 28th July 2025

Sustainable Energy Now (www.sen.asn.au) formed in 2006 is a grass-roots not-for-profit member based advocacy group promoting renewable energy and decarbonisation. Supported by the best science and our own modelling and simulation, we advocate on how Western Australia can make a swift and orderly transition to clean renewable electricity safely, reliably, and affordably with commercially proven technologies.

Ref 1 - AEMO - Voluntary Specification for Grid-forming Inverters, May 2023;