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Chair, Power System Security and Reliability (PSSR) Standards Working Group
Energy Policy WA
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Via email: energymarkets@deed.wa.gov.au

Dear Ms Guzeleva

RE: Power System Security and Reliability (PSSR) Standards Working Group Proposals 6-11

Collgar Renewables (**Collgar**) welcomes the opportunity to provide feedback on the above consultation paper.

Having reviewed the consultation paper, we do not identify any matters that give rise to material concern from our perspective. The focus on clearly articulated Minimum Access Standards (**MAS**), with more advanced Grid Forming Inverter (**GFM**) capabilities deferred, strikes a pragmatic balance between system security and investment certainty in the South-West Interconnected System (**SWIS**).

Proposed GFM definition and interim MAS (Section 3.1; Table 3.2)

Collgar is broadly comfortable with the proposed GRM requirements and definition in Section 3.1.1 and the associated interim MAS framework.

In particular, the behaviour-based framing of GFM as a “controlled voltage source behind a controllable impedance” with stable sub-cycle response is consistent with contemporary international approaches.

We note that the proposals have been informed by expert input, including Etik Energy, whose experience in access standards reform and IBR integration is well recognised globally. On that basis, we are comfortable relying on the technical rigour of that work.

Do-no-harm” and oscillation-neutral principles Proposal 1- (Table 3.2; Section 4.12)

We welcome the introduction of explicit “oscillation-neutral” and do-no-harm concepts for GFM inverter-based technologies (Proposal 10, Section 4.12; Table 3.2). Framing minimum standards around not degrading damping or not worsening system behaviour is consistent with efficient investment signals and avoids over-prescribing performance that may be better valued through future Essential System Services mechanisms.

Consistent with our earlier submissions, we suggest that do-no-harm principles be applied as broadly as possible across disturbance response, oscillatory behaviour and weak-grid performance obligations. Where above-minimum performance is desired, it should ideally be procured transparently through market or service frameworks rather than embedded as mandatory technical standards.

Linkage to prior PSSR submissions

We note that this paper follows closely after the earlier PSSR Standards Review consultation. Given the timing, it is understandable that little, if any, of our previous feedback has been explicitly reflected or referenced in this iteration.

We consider it important that this consultation be read in conjunction with stakeholder submissions made in response to the earlier PSSR consultation, including our own. Many of the principles we previously articulated, particularly around proportionality, do-no-harm concepts and technology neutrality, remain directly relevant.

We would appreciate an opportunity to discuss our prior feedback with Energy Policy WA and Western Power before finalisation of any drafting amendments to the ESM Rules. This would assist in ensuring continuity between the stages of the PSSR process and provide confidence that stakeholder views are being integrated holistically rather than treated discretely.

Kind regards

Steven De Clerck

Chief Operating Officer