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Date: **13 February 2026**

Subject: **Nomad Energy submission relating to the Power System Security and Reliability (PSSR) Standards Review – Proposals 6 to 11**

To: Energy Markets (via email): energymarkets@deed.wa.gov.au

Nomad Energy (**Nomad**) welcomes the opportunity to provide feedback on the latest PSSR Consultation Paper (Proposals 6 to 11) and endorses changes to the existing network rules that facilitate the participation of grid forming (GFM) technologies into the South-West Interconnected System (SWIS).

Nomad is an active market participant in WA's Electricity System and Market (ESM) having developed the largest operational solar farm (Merredin Solar Farm) and more recently delivering the Merredin BESS (100MW/400MWh) project into construction with our joint venture partners Atmos Renewables.

Whilst Nomad supports the PSSR consultation process, including this latest consultation (Proposals 6 – 11), in our view the list of proposals and subsequent recommendations are still overly stringent, technically challenging and will likely negatively impact the uptake of GFM technologies across the SWIS, with existing facilities that have the technology to switch from GFL to GFM choosing to remain in GFL mode.

A critical element that remains absent from the PSSR proposals is an underlying **financial support mechanism** which incentivises proponents to opt for GFM technologies for future and existing (operational) projects. Many of the proposed rules and their associated operational limits will ultimately push developers into acquiring expensive IBR technologies merely to ensure GPS compliance, this will come at a cost to energy consumers, when emerging or new IBR technologies, selected specifically based on individual connection point metrics will not be deemed *fit for* purpose based purely on rule compliance rather than maintaining system strength and reliability. Furthermore, as system strength is dependent on project size and location, applying the proposed set of MAS across all projects will result in increased costs and non-optimal tuning of projects.

Whilst we note that this latest consultation paper is focussing on Proposals 6 – 11, we feel strongly that certain comments from our original submission are worth reiterating as these are critical to the successful roll-out of PSSR requirements to deliver a robust and stable network. To that end, we again note that under Section 3.1 – Network Planning Standards for PSSR of the original consultation paper, specifically **Proposal 1**, that the customer outcome standards states that standards be implemented with *effective incentive mechanisms*. It is not evidenced throughout the original PSSR consultation paper or this latest consultation paper what *effective incentive mechanisms* are being proposed or how they would be implemented as part of the access

arrangement process. In our view, it is critical that these effective incentive mechanisms be proposed to industry.

Nomad further notes that the current consultation paper (Section 1.2) proposes to deal with *hybrid* projects at a later stage – this doesn't provide clarity to developers as to how these facilities will be assessed. Hybrid projects are rapidly becoming the norm as they provide both generation and system strength attributes, to not provide guidance on how these facilities will be treated under the new proposals is impacting investor confidence.

1) Whilst acknowledging that this isn't part of the current consultation paper, we again propose that *hybrid* facilities should be required to meet GPS requirements for GFL technologies, with the GFM proponent being able to operate at lower levels being seen as a bonus rather than the minimum requirements for operation.

Current Consultation Proposal Responses

Nomad notes that under Section 4.1 – SCR Withstand Capability, the following:

1) The proposed MAS for withstand SCR ≤ 2.0 for GFM is **too restrictive** when viewed in isolation. Whilst we agree that GFM inverters are able to withstand SCRs of 2.0 and lower, the ability to do so is interdependent to what level of operation is required to be maintained at these levels as well as the localised network conditions which influence the operation of GFM IBRs. We propose a **MAS ≤ 3.0** for GFM;
2) We do **not support** the MAS withstand SCR ≤ 3.0 and AAS withstand SCR ≤ 2.0 for GFL inverters, the MAS should be increased to no less than **5.0** in order to maintain stable operation and we encourage DEED to discuss with IBR OEMs what level of SCR in GFL mode they would be willing to warrant as in our experience we see SCR levels at 7 being used in supply contracts even though the OEMs themselves accept that their equipment can withstand lower levels – consideration of what levels OEMs will sign up to in commercial supply agreements is an important consideration when setting operational compliance limits;
3) We **agree** with the proposal of no Automatic Access Standard (AAS) for GFM technology;

Nomad further notes that by introducing the proposed low SCR levels this will force developers to select equipment which can meet these levels, such equipment being materially more expensive than other IBR technology available in the market, ultimately leading to an increase in the CAPEX of installations which will ultimately be passed onto energy consumers.

Nomad notes that under Section 4.2 – Voltage Phase Angle Jump Response, the following:

1) We **support** the amended phase angle jump withstand capability reducing from the previously proposed 60° to the newly proposed 25°

Nomad notes that under Section 4.3 –Reactive Current Commencement Time During Contingencies, the following:

1) We **do not think** that 20ms should be the commencement time for GFM technologies and that this limit will pose material challenges in both real time monitoring and accurate simulation / modelling noting the explanations provided in the rationale for this proposal. We propose a commencement time of **no less than 30ms** for GFM and that commencement time should not necessarily be measured from the point of connection as this will impact Wind & Solar Farms which have long feeders back to the generators. We again **propose** these times are measured at the inverter terminals instead, noting that the latest documentation still requires these times to be measured at the connection point, albeit there is now a provision to negotiate the location of the assessment point;

Nomad notes that under Section 4.4 – Reactive Current Rise Time During Contingencies, the following:

1) It should be acceptable that measurement times be taken at either the connection point or the inverter terminals as opposed to having to justify measurement at inverter terminals;
2) The proposed MAS settings are challenging and will not reflect site specific conditions leading to IBR tuning to meet GPS compliance rather than optimal grid performance.

In regards to the overall Guiding Principles as stated in Section 2.1, we note the following:

1) We don't believe that by specifying different MAS levels for GFL and GFM you end up with technology neutrality and would expect there be some incentive for proponents to utilise GFM technology over GFL to delivery greater system strength contributions to the network;
2) References to international practices isn't always apparent, there's numerous ancillary services markets across EU countries which economically incentivise the use of GFM technologies, critically, however this is absent from the proposals presented in the two PSSR consultation papers; and
3) Reference to *value for customers* is at odds with the stringent MAS requirements which will lead to more expensive equipment being required to achieve GPS compliance, the cost of which will ultimately be borne by energy consumers.

Nomad Energy looks forward to engaging constructively with DEED, Western Power and AEMO and other key stakeholders to ensure the roll out of much needed amendments to the ESM rules do not discourage or, in the worst-case scenario, prohibit GFM technologies from entering the SWIS where they will provide much needed system strength attributes.

Sincerely

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