

6 December 2019

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Submitted electronically: Matthew.Holmes@aemo.com.au

Dear Mr Holmes,

AEMO – Issues Paper – Primary Frequency Response under Normal Operating Conditions

We welcome the opportunity to comment on AEMO's Issues paper regarding changes to the Market Ancillary Services Specification. We have provided a brief response to the questions raised by AEMO.

Question 1: Do you support the general concept of recognising PFR within the NOFB as Contingency FCAS?

We support this proposal in principle; it is reasonable to recognise the response of generation plants to manage frequency.

Question 2: Should the recognition of Contingency FCAS provided inside the NOFB apply to all FCAS or only to some services?

Our view is that recognition should only apply to fast response services as this reflects the services that will be acting to arrest frequency before it departs the NOFB, and responding immediately after an event that causes frequency to depart the NOFB.

Question 3. What kind of measurement approach should be applied to assess the to assess the total volume of Contingency FCAS delivered/

Method 3 proposed by AEMO appears reasonable.

If you would like to discuss this submission, please contact me on 03 9976 8482 or Georgina.Snelling@energyaustralia.com.au.

Regards

Georgina Snelling

Industry Regulation Lead



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