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Primary Frequency Response Requirements Document Consultation

Edify Energy welcomes the opportunity to provide comment on the Australian Energy Market Operators (AEMO) interim Primary Frequency Response Requirements (PFRR) Document Consultation. We write as a developer, owner and manager of renewable energy generators and energy storage systems and are currently responsible for 7 renewable energy/storage assets in the NEM.

We refer to section 3.3 (Droop) which defines P_{MAX} in Equation 1 (Droop definition) as “Maximum Operating Level in MW” of a Generating System being the maximum allowed export capacity of the generator. We would propose that P_{MAX} should be replaced with the actual power being generated at the time of the frequency deviation or that this could be negotiated on a project by project basis.

Renewable energy generators often only operate at a level below maximum output based on the available resource. Making the change to actual power prior to the frequency deviation would ensure an overall proportional response to frequency deviations regardless of weather conditions and time of day.

Thank you for the opportunity to comment on this consultation.

Kind Regards,

Sam Hill

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