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To: Violette Mouchilah
AEMO
Via email

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AEMO MASS Consultation – Energy Locals response

Thank you for the opportunity to respond to AEMO’s MASS Consultation. From the tone of one of the industry conference calls that AEMO hosted, it’s clear that the MASS review is triggering an emotional response from some parts of the industry and we hope that this won’t distract AEMO from completing the work in the proposed timeline. On the whole, Energy Locals supports the direction AEMO is taking with a few specific call-outs as detailed in this short response.

Energy Locals exists to contribute to the transition to a cleaner energy system in which customers are more in control of the source and cost of the power they need. We are therefore in strong support of AEMO’s option 2 as we believe this path provides the right level of support to virtual power plants (VPPs) and distributed energy resources (DER), which we believe will continue to scale as customers demand alternatives to traditional grid supply.

We do, however, note that there are some aspects of the proposed option which we believe should be modified:

- 1. One high speed meter per 5MW**
This is an expansion of the current requirement that there must be one high speed meter per jurisdiction. We question the value of this additional cost burden given one high speed meter per 5MW will not provide any data on the performance of individual systems (most likely ~1k per 5MW in the case of small-scale VPPs). We believe that at most AEMO should require one high speed meter per technology type per jurisdiction.
- 2. All controllable units within the same VPP operate with the same type of FCAS controller.**
We expect that as time goes on, more VPPs will be established by organisations that offer customers a choice of technology types. In this scenario we expect that more than one controller may be utilised in order to optimise the DER.
- 3. High-speed meters must capture the power flow measurements from the controllable devices, generating units behind the connection point, grid flow, and local frequency.**

As the actual frequency performance will be measured at the device terminal, we don't understand the value high-speed meter data capturing these other data points.

4. **1MW limit per connection point.**

We believe this proposed limit will reduce the opportunity to deploy DER on commercial sites including residential apartment buildings as it will make it difficult to operate assets that are greater than 1MW as an aggregated fleet. Without this aggregation, the cost base for these >1MW assets will increase and this may make the deployment of otherwise good projects uneconomic.

5. **New Regulation FCAS requirements.**

The requirement for no more than 8 seconds of data latency is inconsistent with the delays already seen in transmission provider and AEMO systems. We don't believe these arbitrary limits add value when it's simple for AEMO to measure regulation FCAS response on a storage fleet vs traditional generators.

Please contact me at any time if you wish to discuss any aspect of this response. We look forward to continued engagement in this process and trust that AEMO will maintain its commitment to completing the MASS review in the timelines proposed.

Yours sincerely,



Adrian Merrick
Founder & CEO
Energy Locals