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Re : Draft MASS review and consultation

To whom it may concern,

Redback Technologies are an Australian company providing hardware and software solutions in the residential and commercial solar and storage markets and under the Luceo brand providing hardware and software solutions to DNSPs and energy retailers for managing DER fleets and managing the impact of DER on LV networks. Redback Technologies has been trading for over 6 years.

This submission relates to the Material Issues – DER section 4.

#### **Section 4.1 Measurement Time Resolution for FCAS Delivered by DER**

Redback Technologies does not see any issue meeting this requirement and can do so with a minor update to existing hardware. The pass-on cost to consumers for this change will be \$0. The meter that is used by Redback Technologies utilises an industry standard chipset and is included with all of our products. We also retail it separately for \$200.

Redback Technologies is ambivalent about whether the measurement interval is 50ms, 100ms or some other interval. However, we would like to affirm that 50ms is achievable for DER, and at a very minimal cost imposition to the consumer.

#### **Section 4.2 Location of Measurement Point for FCAS Delivered by DER**

Redback Technologies agrees with the assessment of the MASS review that the correct measurement point for FCAS and other grid services is at the point of connection. Any other location could make settlement unnecessarily complex for sites with multiple active DER devices behind the meter.

Regards,

Paul Liddell

CTO