

15 March 2023

Australian Energy Market Operator
Level 22
530 Collins Street
Melbourne VIC 3000

Submitted by email to FPPconsultation@aemo.com.au

Frequency Contribution Factors Procedure

Snowy Hydro Limited welcomes the opportunity to comment on the Australian Energy Market Operator (AEMO)'s Frequency Contribution Factors Procedure.

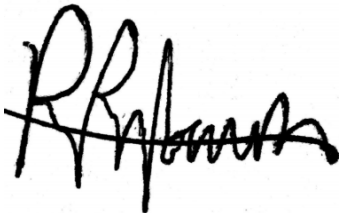
As part of the proposed changes, Snowy Hydro is concerned by the aggregated dispatch conformance. Although the Aggregated Dispatch Conformance (ADC) is being implemented as part of the Integrated Energy Storage Systems (IESS) reform there will still be technologies that are not serviced by one connection point.

Where individual generating units and scheduled loads connect through multiple connection points these should not be treated as an aggregated unit as they will not all fall under the IESS reform. This should be clarified by AEMO and it should demonstrated how it would work with all generators that are not serviced by one connection point.

About the Snowy Hydro Group

Snowy Hydro appreciates the opportunity to respond to the Australian Energy Market Operator (AEMO) Frequency Contribution Factors Procedure. Any questions about this submission should be addressed to panos.priftakis@snowyhydro.com.au.

Yours sincerely,



Panos Priftakis
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Snowy Hydro