

18 November 2021



Stakeholder Relations
Australian Energy Market Operator

Submitted electronically to stakeholder.relations@aemo.com.au

Dear Stakeholder Relations team,

Market Ancillary Service Specification amendment for Distributed Energy Resources

The Public Interest Advocacy Centre (PIAC) is a leading social justice law and policy centre. We are an independent, non-profit organisation that works with people and communities who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication, and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the Australian Energy Market Operator's (AEMO) consultation on amendments to the Market Ancillary Service Specification (MASS). PIAC supports the second draft determination to require a minimum measurement time resolution for fast Frequency Control Ancillary Services (FCAS) providers of:

- 200 ms for aggregated facilities with no inertial response (5% error applies if number of sites is less than 200); and
- 50 ms for all other facilities.

PIAC commends AEMO for taking extra time to consider the issue of measurement resolution and propose a solution that better serves the interests of consumers. The minimum 200 ms resolution provides a much clearer path towards the mature Virtual Power Plant FCAS market needed to support AEMO's goal of the grid handling 100 per cent instantaneous renewable energy by 2025.

We welcome the opportunity to discuss these matters further with AEMO.

Yours sincerely

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