



23 November 2018

Operational Forecasting
Australian Energy Market Operator

Submitted electronically

Dear AEMO Operational Forecasting,

2018 Consultation on (abridged) ECM

Infigen Energy (Infigen) welcomes the opportunity to provide a submission to the abridged consultation of the Energy Conversion Model (ECM). Infigen has a 557 MW portfolio of wind capacity across New South Wales, South Australia and Western Australia and a further 113 MW of wind generation under construction in New South Wales. We are also developing a 25MW/52MWh Battery Energy Storage System (BESS) adjacent to our existing 278.5MW Lake Bonney Wind Farm in South Australia.

Infigen are largely in support of the proposed changes to the ECM and consider most to be immaterial to existing wind or solar assets. We agree that the changes will likely enable an easier process for asset registration which Infigen fully supports.

The one change that Infigen considers significant is the introduction of the 'Possible Power' parameter. If used, the parameter has a material impact on participants partaking in the MP5F trial. Infigen believe the parameter has been well defined in the proposed new ECM. It should be noted however that this parameter will always be a theoretical, calculated metric which is impossible to standardise across assets due to manufacturer and equipment differences. It stands different from the other parameters provided under the ECM which are metrics physically verifiable on-site and standardised easily between assets. In this light, Infigen understand AEMO's rationale for introducing the parameter and strongly agree that it should remain as optional. We don't believe that data provided under the Possible Power parameter by any asset should be used to influence the dispatch process and should only be used as complementary information for AEMO.

To discuss our submission further please feel free to contact me directly on 02 8031 9971 or stephanie.easton@infigenenergy.com

Yours sincerely,

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