



16 March 2020

Matthew Holmes
Principal, System Performance and Commercial
Australian Energy Market Operator

Lodged via email: matthew.holmes@aemo.com.au

Dear Mr Holmes

AEMO: DRAFT DETERMINATION ON MARKET ANCILLARY SERVICE SPECIFICATION

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the changes to the Market Ancillary Service Specification (MASS) that has been proposed by Australian Energy Market Operator (AEMO).

We support the approach taken by AEMO in this revision to the MASS. The Primary Frequency Response (PFR) should be included in the response by generators enabled for the provision of contingency Frequency Control Ancillary Services (FCAS). The measurement technique proposed by AEMO does so in a way that does not require upgrades to the metering of FCAS providing generators.

However, as explained in the draft determination, the method specified by AEMO may not accurately measure responses after a complex event. Consequently, the final determination should specify that if an FCAS supplying generator cannot demonstrate its PFR using the technique being added into the MASS, then AEMO will take into account test performance when evaluating the response.

Should you have any questions or wish to discuss this submission further, please contact Alex Fattal via email alex.fattal@originenergy.com.au or phone, on (02) 9375 5640.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Steve Reid".

Steve Reid
Group Manager, Regulatory Policy