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Australian Energy Market Operator  
GPO Box 2008  
Melbourne VIC 3001  
Submission by email to:  
[mass.consultation@aemo.com.au](mailto:mass.consultation@aemo.com.au)

Dear AEMO

**RE: Market Ancillary Service Specification Consultation - Stage 3**

SwitchDin is an Australian energy software company that bridges the gap between energy companies, equipment manufacturers and energy end users to better integrate and manage energy resources on the grid. SwitchDin's technology enables our clients to build and operate vendor-neutral virtual power plants and microgrids, and to optimise performance across fleets of diverse assets. Founded in Newcastle NSW in 2014, SwitchDin now operates in all states of Australia with early successes in Europe and emerging opportunities in the Americas and Asia.

SwitchDin welcomes the opportunity to provide feedback on AEMO's second draft determination on amendment of the Market Ancillary Service Specification (MASS) as part of Stage 3 of the consultation process.

Our main concern, raised within our submission in Stage 2 of the consultation process, was the requirement for 50ms measurement of power and frequency for the verification of FCAS delivery in the fast FCAS market. We note that this requirement has now been revised to 200ms for aggregators which will significantly decrease the cost of compliance, ensuring that aggregators are able to access the fast FCAS market. We would welcome clarity on whether aggregators will be required to submit aggregated or NMI level data for verification of FCAS delivery.

In addition we note that the discount applied to existing VPP participants is reduced from 20% to 5% as well as further improvements in the readability of the MASS.

We strongly support these changes and thank AEMO for commissioning the additional modelling required to support these decisions following the stage 2 consultation process.

Best regards,

**Andrew Mears**  
Chief Executive Officer