

19 August 2022

Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

mass.consultation@aemo.com.au

Dear Mr Westerman

MASS Amendments – Very fast FCAS

Yurika welcomes the opportunity to provide comment in response to the Australian Energy Market Operator's (AEMO's) consultation on the amendments to the Market Ancillary Service Specification (MASS) for very fast frequency control ancillary services (very fast FCAS) (consultation).

Yurika suggests that the instantaneous power and frequency definitions need to be refined to ensure measurements between power and frequency samples are taken over the same time period to ensure correlation of measurements. It is also recommended that the definitions include the number of cycles to be used to average the measurement samples. For example, whether the definition of 50 ms considered the last single cycle measurement or the average of the last 'x' number of previous cycles. Yurika considers that single cycle measurements should be avoided, as they may be problematic with associated false triggering from switching spikes, waveform distortions and harmonics. Yurika recommends measurements should be aligned with a frequency cycle, not part of a cycle.

The standard referred to, i.e. IEC61557-12, has the frequency accuracy at +/-2%, with a 3 second settling period for a measurement. The requirements specified in Table 5 of the consultation document require a resolution of 0.0025 Hz, which is far in excess of the accuracy requirements defined in EC61557-12. Yurika recommends re-consideration of the use of this standard to define the accuracy requirements.

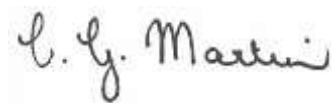
Further, from a metering perspective, there is very little capability in the typical market meters currently deployed to meet the new requirements of very fast FCAS (50 ms). Yurika recommends further consideration of the ability to leverage the capabilities of the existing metrology investments.

With regard to validation of metering, Yurika agrees there should be a component of traceability of measurements performed as part of the assessment process to comply with Table 4 of the MASS. Different instrument classes for each FCAS market segment (from delayed to very fast) could also be considered.

Yurika suggests a possible error in Table 5 of the consultation document, which lists items that show the relationship of the market to the response times. Yurika seeks confirmation as to whether the first response time should be noted as 50 and the second as 100, where potentially the greater than/less than signs may be incorrectly allocated in the definitions in the number of FCAS facilities.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact Laura Males on 0429 954 346 or myself on 0438 021 254.

Yours sincerely



Charmain Martin
Acting Manager Regulation

Telephone: 0438 021 254
Email: charmain.martin@energyq.com.au