

18 June 2022

Dear MASS Consultation Team,

Thank you for the opportunity to contribute to the Very Fast FCAS MASS consultation.

In the past Reposit has invested significant effort and time into the MASS consultation processes to bring to light key engineering and market issues. Whilst some of this analysis has been challenging to AEMO it has been accepted as helpful by the MASS Consultation team and has catalysed a strengthening of many people's knowledge of the details of the FCAS service.

AEMO CEO Intervention into MASS Consultation

Reposit was disappointed with the final determination of the previous MASS consultation. Most acutely because reporting of the consultation seems to suggest that rigorous engineering analysis and communication over a year of consultation by dozens of contributors may have been swept aside by "an intervention" by AEMO's CEO¹

"Several insiders credited an intervention from new CEO Daniel Westerman"

Reposit is not aware of AEMO disputing the reporting of this intervention.

If this intervention did occur, it vastly devalued the consultation process and discourages future meaningful contributions of knowledge and analysis by market participants to AEMO. At a time of catastrophic market outcomes, the contributions of expert engineers, market participants and systems designers are invaluable to AEMO.

Very Fast FCAS Metrology

Reposit notes that Melbourne University's case study based analysis² of metrology error continues to understate the uncertainty that slow sampling rates introduce. There are rigorous numerical approaches that can be applied and have been demonstrated by Reposit in the past. Reposit has stated on many occasions that a case study analysis measures only the error in the case study data, and this error is not rigorously generalisable to other datasets. This is recognised by the University of Melbourne in their analysis:

"It should be appreciated that a lot more profiles should be analysed to reach statistically significant conclusions"

An understatement of error will give AEMO a false sense of security in the performance of the Very Fast FCAS service. This service will be increasingly important as inertia leaves the NEM and the economy is electrified. The correct metrology for this service is a matter of national interest and should be attended to by the National Measurement Institute (NMI) for the same reasons the M6 electricity metering standard was developed by the NMI³.

Reposit considers it essential for AEMO to facilitate NMI involvement in formulating the metrology for the Very Fast FCAS service to at least the extent that Melbourne University has been involved in


¹ <https://reneweconomy.com.au/big-win-for-virtual-power-plants-as-aemo-backs-off-on-metering-changes/>

² https://aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2022/amendment-of-the-mass/very-fast-fcas-verification---final-report.pdf

³ https://www.industry.gov.au/sites/default/files/2019-05/nmi_m_6-1.pdf

FCAS metrology to date. Reposit will contribute to this involvement by providing strong support to NMI in becoming familiar with the FCAS family of services.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'D. Spaccavento', with a long horizontal flourish extending to the right.

Dean Spaccavento
CEO
Reposit Power