

20 January 2023

Australian Energy Market Operator  
Level 22, 530 Collins Street  
Melbourne VIC 3000

Via email: [iess@aemo.com.au](mailto:iess@aemo.com.au)

AEMO IESS Project team,

**Feedback on SO\_OP\_3705 Dispatch procedure (Dynamic ADC)**

We refer to the published document “SOOP3705 Dispatch procedure Dynamic ADC Changed marked Draft.pdf” on AEMO’s consultation page and the invitation to provide feedback.

Founded in 2012, Total Eren is the dedicated renewable energy subsidiary of EREN Groupe. Total Eren is an Independent Power Producer (IPP), which develops, finances, invests in, builds and operates renewable energy power plants worldwide for the long-term. Since December 2017, TotalEnergies, a key player in the energy sector, has been a shareholder of Total Eren.

Total Eren Australia developed and now operate the 200 MW Kiamal Solar Farm and 190 MVA Kiamal synchronous condenser located in north-west Victoria. Since 2021, we have been actively developing two large scale solar farms combined with DC-coupled storage. These developments represent close to 1 billion dollars of investment with a target construction commencement date in 2023.

With regards to the technology, DC-coupled storage, when compared against standalone or AC-coupled storage, offers a significant opportunity to save on capital expenditure by reducing the amount of equipment and increase operational efficiency in terms of storing excess solar.

We welcome AEMO’s introduction of the Mixed Aggregate definition, which has addressed Total Eren’s previous concerns regarding a DC-coupled system, as well as the methodology associated with assessing conformance. We view this modification compared to the previously published High Level Design as a significant improvement.

As outlined in section 2.6.5(c), we note that a battery cannot provide regulation FCAS services and participate in aggregated dispatch conformance concurrently. Ideally, we would like to have the ability to perform these operations concurrently, should we be available and capable to. However, we do not yet have a proposed modification that would align with the Aggregate Dispatch Conformance solution. Whilst we do not view the inability to perform these

operations concurrently as a significant impediment to the viability of our projects, we would welcome the opportunity to explore this further with AEMO in future.

If you have any questions on this submission, please feel free to contact Trevor Lim on 0432 848 768 or via email at [trevor.lim@total-eren.com](mailto:trevor.lim@total-eren.com).

Yours sincerely,



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Trevor Lim  
Senior Manager, Markets & Grid

**Submitted on behalf of Total Eren Australia Pty Ltd**