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12 December 2025

Ms Dora Guzeleva
Director Wholesale Markets
Energy Policy WA
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Dear Ms Guzeleva,

Essential System Services Framework Review (ESSFR) Consultation Paper

The Australian Energy Market Operator (AEMO) appreciates the opportunity to provide a submission on the ESSFR consultation paper. AEMO recognises the importance of ensuring Essential System Service (ESS) requirements are set and procured at their most efficient level and has supported the ESSFR by providing data and detailed technical analysis, to assist Energy Policy WA (EPWA) in developing its proposals.

Proposed amendment to the RoCoF Safe Limit

AEMO strongly supports the proposal to relax the RoCoF Safe Limit from 0.25Hz to 0.75 Hz/s over 500 milliseconds and notes that a summary of our detailed analysis and modelling was included in the Consultation Paper, to demonstrate the benefits of the proposal.

This analysis looked at the current RoCoF Ride-Through Capabilities of Registered Facilities and determined that relaxing the RoCoF Safe Limit is likely to result in fewer interventions by AEMO's control room. As a reduction in manual interventions would lead to a reduction in Energy Uplift Payments, AEMO considers this would lead to more efficient dispatch, better market outcomes, and reduced market costs, without compromising Power System Security and Power System Reliability.

RoCoF Ride-Through Capability under the amended RoCoF Safe Limit

There were several questions at the November 2025 Market Advisory Committee meeting around the accreditation process for Facilities under the amended RoCoF Safe Limit. AEMO notes that this process will continue in accordance with AEMO's Wholesale Electricity Market (WEM) Procedure: Frequency Co-optimised Essential System Services (FCESS) Accreditation as follows:

- All existing Facilities that have not sought accreditation or commenced an Amendment Process are deemed to have a RoCoF Ride-Through Capability at the RoCoF Safe Limit. This scenario will be the same under the amended RoCoF Safe Limit.
- All existing Facilities that have been accredited for RoCoF Ride-Through Capability will retain their accredited value, which will be converted from Hz over 500 milliseconds to Hz/s over 500 milliseconds.

As RoCoF Ride-Through Capability values are reflected in Standing Data, AEMO will work with Market Participants to ensure the Standing Data for relevant Registered Facilities is appropriately updated.

RoCoF Ride-Through Cost Recovery Limit

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Clause 2.34A.12I of the Electricity System and Market (ESM) Rules outlines the parameters under which AEMO must set the RoCoF Ride-Through Cost Recovery Limit in the FCESS Accreditation WEM Procedure (clause 2.34A.13 of the ESM Rules). If the change to the RoCoF Safe Limit is implemented, AEMO recommends making the following amendments to clause 2.34A.12I:

- Corresponding amendments to the unit of measurement for the RoCoF Ride-Through Cost Recovery Limit under 2.34A.12I(b) and (c) to ensure consistency with the amended RoCoF Safe Limit (i.e. change from Hz over 500 milliseconds to Hz/s over 500 milliseconds).
- A minor amendment to clause 2.34A.12I(b) to require a “minimum” precision to prevent rounding issues, should the RoCoF Ride-Through Cost Recovery Limit be amended in the future.
- An amendment to clause 2.34A.12I(c), to change the minimum level at which the RoCoF Ride-Through Cost Recovery Limit can be set above the RoCoF Safe Limit from 0.25 Hz over 500 milliseconds to 0.25 Hz/s over 500 milliseconds.

AEMO notes that the effect of the third recommended change would be to slightly reduce the minimum level at which the RoCoF Ride-Through Cost Recovery Limit can be set. This recommendation is on the basis that the existing level was set conservatively, as the RoCoF Ride-Through Capability of Registered Facilities was largely unknown prior to the commencement of the new WEM. A buffer was therefore required as, while Facilities are accredited for RoCoF Ride-Through Capability above the RoCoF Safe Limit, this is only on the basis of engineering reports and/or historical responses to RoCoF events. These do not provide complete observations or test a Facility’s capability at the extremes of the RoCoF Safe Limit, due to the financial burden of simulating these scenarios and the inability to test in real time on the South West interconnected system (SWIS).

Since the New WEM Commencement Day, AEMO has accredited 23 Facilities for RoCoF Ride-Through Capability above the RoCoF Safe Limit. This has enabled us to gain confidence in the accreditation process itself and the capability of the Facilities that have undergone accreditation. Therefore, AEMO would be comfortable to reduce the minimum RoCoF Ride-Through Cost Recovery Limit as there remains enough buffer for where real time performance may differ from accredited RoCoF Ride-Through Capability.

If EPWA does accept this recommended change, AEMO will commence the Procedure Change Process to set the revised RoCoF Ride-Through Cost Recovery Limit in the FCESS Accreditation WEM Procedure (in time for the commencement of the relevant ESM Rules).

AEMO looks forward to continuing to work with EPWA on the implementation of the recommended proposals. Should you have any queries about this submission, please contact Sarah Graham, Manager Regulatory Affairs at Sarah.Graham@aemo.com.au.

Yours sincerely,

Signed by:

Kirsten Rose
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Executive General Manager – WA and Strategy