NewGenPower

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Re: Essential System Services Framework Review – Consultation Paper

NewGen Power Kwinana (NPK) welcomes the opportunity to provide feedback on the Essential System Services Framework Review Consultation Paper. NPK is generally supportive of the proposed outcomes and wishes to provide the following for consideration:

Proposal 1: AEMO to update and publish the technical and operational guidelines relating to FCESS quantification and dispatch processes.

NPK is supportive of Proposal 1, as the publication of updated technical and operational guidelines relating to FCESS quantification and dispatch processes will improve transparency for market participants. Giving participants access to this information will also support more efficient decision-making/outcomes, reduce uncertainty around AEMO's operational processes, and hopefully confidence in the overall FCESS framework.

Proposal 2: AEMO to review the inputs, parameters and assumptions for the DFCM and test whether they should be updated to reflect current system conditions and drive relevant and correct outputs.

NPK supports Proposal 2, noting the importance of ensuring that the inputs, parameters and assumptions within the DFCM remain accurate and reflective of current system conditions. Regular review of these settings is essential to maintaining accurate model outputs and ensuring that FCESS procurement and dispatch processes remain efficient.

However, we consider it critical that any review undertaken is done in close consultation with market participants and well communicated to market participants. Industry engagement will help validate assumptions and ensure that any updates to the DFCM are well-understood by all involved and appropriately integrated into market processes.

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Proposal 3: Increase the RoCOF Safe Limit from 0.25 Hz per 0.5 seconds to 0.75 Hz per second to reduce the need for AEMO interventions.

Whilst NPK supports an increase in the RoCoF Safe Limit, NPK considers the proposed increase may still remain conservative. When compared with limits applied in other jurisdictions, a threshold of 1 Hz per second is still regarded as cautious while maintaining secure system performance. NPK suggests a phased approach whereby the RoCoF Safe Limit is initially increased to 0.75 Hz with a view of increasing the safe limit to 1 Hz or higher in the next six months'.

Proposal 4: AEMO to implement a monitoring program over a twelve-month period to track the amount of headroom and footroom available from unaccredited Facilities or non-dispatched FCESS Facilities to better quantify mandatory Primary Frequency Response (MPFR) availability to assess the level of Contingency Reserve Raise and Lower that could be provided from the inclusion of MPFR.

NPK agrees that a data-driven understanding of MPFR availability will assist in refining procurement levels, enhancing operational efficiency, and ensuring that system security requirements are met without procuring more services than necessary.

Additionally, NPK recommends that AEMO considers and includes the inertia provided from non-accredited RoCoF Facilities. As NPK understands currently only accredited RoCoF Facilities are used in AEMO's inertia calculations and the inertia from non-accredited Facilities is ignored; possibly resulting in further conservative and non-efficient market outcomes.

Proposal 5: Assess the suitability of synthetic inertia (RCS) from Battery Energy Storage Systems (BESS) in complementing synchronous Inertia from rotating machines, and consider potential barriers and suitable incentivies for grid-forming BESS to provide such services.

While it is appropriate for the market to continue developing and signaling stability services, including those provided by emerging grid-forming technologies, NPK cautions against relying too heavily on a single technology pathway, particularly in an isolated system like the WEM. Grid-forming capability remains relatively untested at scale, and diversification of stability solutions remains prudent.

Yours Sincerely,

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