



Ms Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator

Lodged by email: pfr@aemo.com.au

Dear Ms Zibelman,

Primary Frequency Response Requirements Document Consultation

The Clean Energy Council (CEC) is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in renewable energy and energy storage along with more than 6,500 solar and battery installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC welcomes the opportunity to provide comment on the Australian Energy Market Operators (AEMO) interim Primary Frequency Response Requirements (PFRR) Document Consultation. The CEC was actively engaged in the Australian Energy Market Commission's (AEMC) rule change request process to implement the mandatory primary frequency response requirement. We wish to provide two high level comments for AEMO's consideration ahead of finalising the interim PFRR document.

Section 3.2 (Deadband) of the document notes that each affected generator must provide PFR outside the Affected GS' Deadband, which must be no wider than the PFCB. At the AEMO workshop held on the 27th of February 2020, AEMO stated that not every generator will have the same deadband applied and there is scope for a generator to agree a wider deadband with AEMO. The ability to agree a wider deadband with AEMO is not included in the document. The CEC wish to clarify whether there is scope for a wider deadband.

Section 3.3 (Droop) displays equation 1 that demonstrates how droop will be calculated. During the AEMO workshop referenced above, AEMO stated that the change in active power would be based on the available power at the time. Therefore, AEMO should clarify the interpretation of **P_max** in the droop equation to avoid confusion. It is important that this is clarified in the PFRR document as generators should respond to frequency changes outside the PFCB based on their current level of generation.

Thank you for the opportunity to comment on this consultation. If you would like to discuss any of the issues raised in this submission, please contact Tom Parkinson, Policy Officer, on (03) 9929 4156 or tparkinson@cleanenergycouncil.org.au or myself, as outlined below.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lillian Patterson'.

Lillian Patterson
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