

11 December 2020



Ms Audrey Zibelman
Chief Executive Officer and Managing Director
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

Submitted on 11 December 2020 via email: 2020PSFRR@aemo.com.au

Dear Ms Zibelman

Power System Frequency Risk Review – Stage 2 Draft Report

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the *Power System Frequency Risk Review – Stage 2 Draft Report* (Draft Report). AEMO has requested feedback on the content of the Draft Report prior to the final Power System Frequency Risk Review (PSFRR) being published in mid-2021.

Energy Queensland recognises the challenge that increased distributed energy resources presents in managing the network in case of contingency. Energy Queensland's distribution network service providers, Ergon Energy Network and Energex, have connected approximately 750,000 photo-voltaic systems on 35% of houses while maintaining safe and secure networks across the state.

We acknowledge the role that under-frequency load shedding (UFLS) plays in maintaining power system security and the challenge with attempting to utilise load shedding schemes that may be ineffective.

The Draft Report indicates that more information about the modelling performed and its specific findings may not be available until mid-2021. As such, Energy Queensland is hesitant to finalise any review of its UFLS schemes prior to this, as the outcomes of the review may impact on how updates are progressed. For example, the speed with which the UFLS needs to act will determine what measures can be taken, and the associated cost in implementing changes, as well as any regulatory implications. Furthermore, Energy Queensland will need to work with the jurisdictional coordinator (Powerlink Queensland) to understand the identified constraints and develop solutions which may be impacted by other specific areas of concern in the PSFRR report.

In addition, Energy Queensland seeks to understand further if there are specific challenges observed by AEMO within the Queensland distribution network.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact me on 0467 782 350 or Laura Males on 0429 954 346.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Trudy Fraser'.

Trudy Fraser
Manager Regulation

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