

11 March 2021

Mr Nino Ficca
Interim CEO
AEMO

Via email: mass.consultation@aemo.com.au

Subject: Comments on the MASS Consultation, January 2021, Issues Paper

Dear Mr Ficca,

sonnen is a major manufacturer of residential home battery storage systems and operator of VPPs providing balancing services in Germany, Italy, and the United States. In the NEM, we are a registered MASP and are active in the contingency FCAS markets as a participant in AEMO's VPP Demonstration Program.

We welcome this opportunity to comment on AEMO's consultation.

Measurement Requirements

The current MASS is a historical document reflecting in part the technologies available during its creation. The grid is changing faster than expected, and AEMO has to be commended for recognising that the future is actually here, and then taking steps to try out new solutions.

The VPP demonstration program examined alternate ways to obtaining FCAS from new types of distributed assets. This experiment showed that these distributed assets (residential and commercial storage) can effectively deliver contingency FCAS.

Hence, we support AEMO in adapting the MASS to incorporate the changes verified in the VPP demonstration program, specifically those related to *resolution* and the *location* of measurements (*Section 2.3.2 – Option 2: Embed measurement requirements tested in the VPP Demonstrations*).

Furthermore, remaining with the existing MASS for measurement will force us to withdraw from some, if not all of the contingency FCAS markets due to the cost related to upgrading existing installations and modifying existing battery models.

As a supplementary point, we do not see the rationale for requiring each participant to have one fast meter for every 5 MW in a region.

Please contact Jitendra Tomar on 0403 330 9976, or j.tomar@sonnen.com.au, or myself, should you like to discuss our submission.

Yours truly,



Nathan Dunn
Managing Director
sonnen Australia Pty Ltd