

Second Draft Determination

EDMI Submission



Australian Energy Market Operator

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Response to the Second Draft Determination

Thank you for the opportunity to provide our response to the Second Draft Determination of the Market Ancillary Service Specification (MASS). In short, EDM I believes that the proposed amendments are positive and provide a potential path toward unlocking fast-FCAS capability for the millions of devices already operating in the NEM today.

EDMI is a global leader in the provision of end-to-end smart metering solutions including communications equipment and head-end reading software. Headquartered in Singapore and owned by Osaki Electric Co in Japan, EDM I has deployed more than 24 million smart meters in more than 100 countries to date.

Closer to home, EDM I Australia has deployed a significant volume of Power Of Choice electricity meters into the NEM – more than 3 million regionally. EDM I Australia customers are provided with a comprehensive metering solution including a software headend solution that is under continuous development and improvement, as well cellular-enabled smart electricity meters capable of firmware update over-the-air when new features are required.

EDMI is supportive of the proposed amendments to the MASS for the increased market participation it will provide.

We note that the previous fast-FCAS reporting interval of 50ms was prohibitive from a hardware perspective – very few devices are available to support this requirement. Revision of the requirement to a 200ms reporting interval will enable MASS participation using a much larger range of devices, inclusive of EDM I's currently deployed fleet of PoC NEM meters. As household DER and battery technology continue to reduce in price, this increased participation capability will impact positively on the operation of the NEM. EDM I believes that leveraging the experience of established market participants and their current proven infrastructure provides a robust utility-grade solution that will enhance grid security and resilience at an optimal price point.

From a technical and measurement point-of-view, EDM I agrees with views expressed in previous submissions regarding FCAS Settling Time requirements. With reference to Table 4 of the 2nd draft specification, EDM I agrees that "The time required for the measurement to remain within 99% of final value after a step change from zero" should be clarified with respect to frequency measurements.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Newell', with a horizontal line underneath.

Richard Newell

General Manager Electricity