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Australian Energy Market Operator
152 St Georges terrace
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Dear Australian Energy Market Operator

Re: Jacobs 2018-19 Margin Peak and Margin Off-peak Review

NewGen Power Kwinana Pty Ltd (NPK) has reviewed the public draft assumptions report issued by Jacobs on 26th September 2017. NPK would like to address an assumption contained in the report which it believes to no longer be relevant.

Section 8.2 Load Following Ancillary Service, states the following:

The total SR requirement in the WEM is therefore reduced by the amount of LFAS that is being provided. The exceptions to this include any LFAS that is provided by Cockburn CCGT and NewGen Kwinana CCGT. Both facilities have been granted primary frequency control exemption under the Technical Rules and have been confirmed by System Management as ineligible to provide spinning reserve service. This has resulted in Cockburn CCGT's and NewGen Kwinana CCGT's control system configuration being unable to automatically respond to changes in system frequency other than to LFAS quantities.

NPK does not believe the above assumption correctly reflects the response capabilities of NewGen Kwinana CCGT. The Technical Rule exemption #21 was granted to NPK on the 20th January 2014 for primary frequency control to allow testing and control changes for the plant and governor compliance issues at the time. The exemption expired on the 30th June 2014 and NPK believe that the plant has been providing Primary Frequency Response and LFAS raise in accordance with the rate of response requirements in TR 3.3.4.4 (f).

NPK would like to request a meeting to ensure that the assumptions used in the Jacobs report are correct. NPK will have attendance from our Technical and Engineering staff to assist the discussions.

Yours Sincerely,

Daniel Kurz

General Manager – Trading, Commercial & Regulatory