

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged online

24 April 2018

Dear Mr Pierce,

RE: Frequency Control Frameworks Review Draft Report

Thank you for the opportunity to comment on the *Frequency Control Frameworks Review Draft Report*. As the peak body for the health and community services sector in South Australia, the South Australian Council of Social Service (SACOSS) has an established history of interest, engagement and provision of proposed advice on the necessary market mechanisms for and regulation of essential services. Our research shows that the cost of basic necessities like electricity impacts greatly and disproportionately on vulnerable people. Our advocacy is informed by our members and direct consultations with consumers and other consumer organisations: organisations and individuals who witness and experience these impacts in our community.

SACOSS is broadly supportive of the Draft Report. In particular, SACOSS welcomes the focus on addressing declining primary frequency response, more regular reporting on power system frequency performance and the potential for distributed energy resource participation in system security frameworks. SACOSS supports the view that there should be effective market mechanisms for procuring the desired services including DER in a technology neutral manner, allowing for the least cost provision of system security services. SACOSS also supports a review of the MASS to address barriers to distributed energy resources providing fast frequency control services. SACOSS supports conducting of trials of aggregated distributed energy resources providing FCAS to assess their ability to provide services under different network conditions, and how the provision of those services affect the local network and the power system more broadly.

We thank you in advance for consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on (08) 8305 4211 or via jo@sacoss.org.au.

Yours sincerely,



Ross Womersley
Chief Executive Officer



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