

Mr Neville Henderson  
Chairman  
Reliability Panel  
C/o Australian Energy Market Commission  
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Dear Mr Henderson,

**RE: REL0065 – Consultation on Issues Paper – Review of the frequency operating standard, 14 July 2017**

Thank you for the opportunity to comment on the *Reliability Panel's Review of the frequency operating standard Issues Paper, 14 July 2017*. 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.

**Issues arising from the emergency frequency control schemes rule**

SACOSS believes that it is important for AEMO to continue to act in a way that seeks to prevent the system from collapsing following an extreme event. SACOSS is concerned about moves which would mean that AEMO would face no obligation to manage the system for any event that falls outside the definition of a protected event. SACOSS believes that it is important for the FOS to include requirements in relation to power system operation following multiple contingency events.

**Guidance on the characteristics of a power island**

SACOSS believes it is appropriate for the FOS to contain further guidance on the characteristics of a viable electrical island given the possibility of separation events, especially for a region such as South Australia.

**The requirement for a maximum accumulated time error**

SACOSS believes that the FOS should no longer require AEMO to limit the accumulated time error in frequency. As the Panel has stated, accumulated time error does not improve the reliability or security of the power system, and customers now rely on synchronous electric clocks much less than in the past.

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](mailto:jo@sacoss.org.au).

Yours sincerely,

Ross Womersley, Chief Executive Officer