

WEM Procedure: FCESS Accreditation

Post-consultation changes

Other comments and AEMO's response

Summary of comment	AEMO's response
Definitions – Definition of AGC included, whilst defined in WEM Rules	AGC definition now links to WEM Rules
Definitions – High-Resolution Time Synchronised Data Recorder should align with Comms and Control WEM Procedure	Updated to match definition under Comms and Control WEM Procedure
General question – references to “in accordance with details on the WEM Website” is not clear	Requesting feedback now that processes are detailed on the WEM Website, provides a central location for contact details and relevant documents/submission forms
2.2.8 – Request a process to consult with a market participant prior to making a determination which varies from the initial application (Transitional Accreditation)	AEMO considers that the consultation allowed for under 2.2.3(c) is sufficient to allow the Market Participant to provide all available supporting information to substantiate its request
3.1.6 - Question whether flexibility to vary the requested “proposed Accreditation Parameters” is considered in accreditation process	3.1.5(a)(iv) updated to explicitly allow for variation of proposed Accreditation Parameters

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3.1.8 Suggest paragraph may mean a Facility withdraws from entire application, rather than a given FCESS (where applying for multiple FCESS accreditation)	Amendment made for clarity
4.1.1(e) Minimum Quantity for Regulation of 10 MW may prevent participation	AEMO is continuing to analyse and evaluate this quantity
4.2.2 Contingency Reserve Lower being limited to Continuous rather than block response	AEMO has identified this issue to EPWA and has recommended rule amendments to allow Block Responses to provide Contingency Reserve Lower
4.2.7(a) Under-frequency Relay Trip time <400ms, this may prevent access to switched service providers that are unable to meet this requirement	AEMO would welcome feedback on types of technology that would be unable to trip within this timeframe. AEMO considering options for assessment of switched response under the Speed Factor determination
4.2.8 No maximum Droop Setting (for Facilities not under a Registered Generator Performance Standard)	4% Droop included, to align with GPS
4.2.12 Clarity requested regarding the application of clause for HRTSDR across multiple connection points	AEMO amended to provide clarity that all connection points must have appropriate HRTSDR
4.2.13 Feedback that requirements of Comms and Control WEMP and Operational Data Points for Registered Facilities may not be appropriate for Interruptible Loads	AEMO to reflect requirements in Operation Data Points for Registered Facilities, and consider changes to Communications and Control WEM Procedure
4.4.1 Accreditation Parameters Table should not include an option for Block Response for Contingency Lower and should not include a Performance Factor of 1 for Contingency Lower	AEMO updated for Block Response, however AEMO has retained a Performance Factor of 1 for Contingency Lower – as whilst the rules are silent on whether this can be a non-zero value, the policy intent has been to only apply Performance Factors to Contingency Raise (also note the lack of Power System drivers for inclusion of Performance Factors)

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6.1.5 Request clause is explicit that re-accreditation is only for the specific FCESS which AEMO has identified issues (rather than all services for which the Facility is accredited), also request that Facilities which have not been enabled not be automatically re-accredited.	AEMO amended clause to specify that re-accreditation is only for the relevant FCESS. AEMO considers that Facilities not being enabled (ie. cleared) for the relevant service over 2-years would require re-accreditation
6.1.5 Request specifics (name, FCESS, reasons) are published for Facilities required to undergo re-accreditation	AEMO has retained existing drafting, the intent is only to publish the Facility name, rather than provide reasons
6.1.7 Question over whether WEMP allows for strategic decisions to accredit for lesser quantities of FCESS than capable of providing, to ensure capability to maintain compliance with requirements.	AEMO considers the WEMP does allow for this for new Providers (with the exception of transitional accreditation – based on AEMO determination). 6.1.7 allows for both over-delivery and under-delivery of service, both of which may represent a PSSR risk.
7.1.2 Question over the Contingency Reserve quantification being to 1.025 Hz and whether this undervalues the capability of a Facility when the Credible Contingency Frequency Band is to 48.75 Hz (1.25 Hz)	AEMO considers the use of 1.025Hz allows for an appropriate margin from UFLS to ensure procured quantities maintain PSSR when accounting for: <ul style="list-style-type: none"> • Imprecise modelling of the physics of the power system • Protection against partial (or full) non-provision of service Note that Market Participants may increase quantities by modifying Droop Parameters to gain access to larger quantities
7.1.2 Question how the Contingency Reserve quantification applies to Interruptible Loads	AEMO has provided further clarity in the FCESS Testing Guideline, which has now been published
7.2.7 Recommend the inputs to the speed factor equation are linked to the relevant GPS	AEMO amended to link to GPS (where applicable)

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Issue	Resolution
7.2.7 – Error in equation	AEMO corrected equation, removing second PFR term, and adjusting Max to Min.
7.2.9 – Comparison of Reference Profile at the Frequency Nadir will not be operable for an injected frequency bias	AEMO amendment to include the Frequency nadir, or 4-seconds, whichever is greater
Explanatory Box E[L] – lack of clarity of the Δf	AEMO amended to $DB(\Delta f)$ to align with subsequent term in 7.2.7
9.1.2 Testing for 50% ramp rate may not apply to all Facilities	AEMO removed 9.1.2(a)(ii)
11.2.4 Request “equipment” replaced with “facility” for the purposes of an engineering report supporting RoCoF Ride-Through Capability. Also requests that additional information is requested when “acting reasonably”	AEMO considers that the engineering report should identify equipment comprising a Facility rather than the whole Facility. AEMO does not see a need for “acting reasonably” for the purposes of identifying a need for additional information.
12.1.4 Request “at least” be removed to require AEMO to set the RoCoF Ride-Through Cost Recovery Limit at 0.25 Hz above the Safe Limit	AEMO amended to remove “at least”