

20 February 2020

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

Electronic Submission – ERC0278

Draft Determination – System Restart Services, Standards and Testing

Dear Mr Pierce

Energy Networks Australia welcomes the opportunity to provide a response to the Australian Energy Market Commission’s (AEMC) Draft Determination on System Restart Services, Standards and Testing.

Energy Networks Australia is the national industry body representing Australia’s electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

Energy Networks Australia is supportive of improvements to the framework to enable cost effective measures for power system resilience, including improving how quickly the system can be restored following a major disturbance.

The Draft Rules require the Australian Energy Market Operator (AEMO) to test the system restart plan at least once every three years as a “must” obligation in rule 4.3.6 (a). Energy Networks Australia considers that it would be worth enabling a risk-based approach to provide AEMO discretion not to retest if the System Restart Ancillary Service (SRAS) provider and other conditions are the same.

Energy Networks Australia supports the drafting in the rules which enable AEMO to schedule and reschedule a test. However, Energy Networks Australia considers that the proposed dates should be discussed with the impacted parties (Transmission Network Service Provider’s (TNSP) and Registered Participants) before they become the firm test dates. There may be localised conditions which also need to be taken into account when scheduling and rescheduling a test date that may cause concerns to impacted parties.

As noted in Energy Network Australia's previous submission in relation to this consultation¹, impacts of SRAS testing will vary from test to test. It is therefore important to comprehensively consider and minimise the impacts of SRAS testing on all participants. This includes impacts to generators, transmission and distribution load customers along with Distribution Network Service Providers (DNSPs).

Energy Networks Australia supports the exemption of the testing arrangements from the Service Target Performance Incentive Scheme and that the National Electricity Law immunity provisions set out in s119(2) clearly apply to these testing arrangements. Some minor drafting amendments that were discussed with the AEMC on 23 January 2020 are provided at Attachment 1.

Should you have any queries on this response please feel free to contact Verity Watson, vwatson@energynetworks.com.au.

Yours sincerely,



Andrew Dillon
Chief Executive Officer

¹ Energy Networks Australia response to AEMC Consultation paper – System Restart Services, Standards and Testing, 17 Oct 2019

Attachment 1

4.3.6(d) “After consulting with the relevant Transmission Network Service Provider and Registered Participants under paragraph (c), AEMO may prepare the test program for the test and **must** provide that test program to the Transmission Network Service Provider and the Registered Participants

4.8.12(j) “AEMO and NSP must jointly develop **agreed** communication protocols **set out in writing** to facilitate the exchange of all information relevant to the roles played by AEMO, Network Service Providers, Generators, Customers and other Registered Participants in the preparation and implementation of the system restart plan”.