

Our Ref: 63795-D18/25719
Your Ref: ERC0229
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7 March 2018

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH, NSW, 1235

Dear Mr Pierce

Re: Submission on National Electricity Amendment – Testing of system restart ancillary services capability

Thank you for the opportunity to respond to the Testing of system restart ancillary services (SRAS) rule change consultation paper.

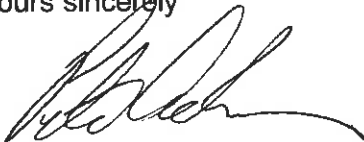
We support AEMO's proposal to amend the National Electricity Rules (Rules) to allow short notice SRAS testing in accordance with the SRAS guideline 2017.

Targeted SRAS testing, such as short notice testing, helps ensure the system restart plan is effective by confirming the contracted ancillary service is available and the relevant procedures are clearly understood by all relevant parties. A more time constrained testing environment will give a better indication of the deliverability of the contracted SRAS in circumstances closer to actual black start conditions than the previous testing regime.

Accordingly, we consider the relevant clause ought to be amended to align the rules with an improved testing regime as set out under the SRAS guideline 2017.

We welcome the opportunity to discuss the submission with you. If you have any questions please do not hesitate to contact Joanna Gall on 08 8213 3461 or Joanna.Gall@aer.gov.au.

Yours sincerely



Peter Adams
General Manager
AER Wholesale Markets

Sent by email on: 07.03.2018