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Australian Energy Market Commission
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SYDNEY SOUTH NSW 1235

20th February 2020

Submitted online to: <https://www.aemc.gov.au/rule-changes/system-restart-services-standards-and-testing>

Dear Mr Shannon,

System Restart Services: Standards and Testing
Reference: ERC0278

The Australian Energy Council (the “**Energy Council**”) welcomes the opportunity to make a submission in response to the Australian Energy Market Commission’s (“**AEMC**’s”) *System Restart Services (Standards and Testing) Draft Rule Determination*.

The Energy Council is the industry body representing 23 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia, sell gas and electricity to over ten million homes and businesses, and are major investors in renewable energy generation.

Discussion

The Energy Council commends the AEMC for its thoughtful and pragmatic draft rule determination, and supports the proposed more preferable draft rule.

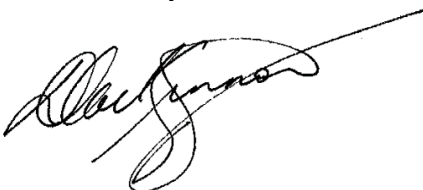
It is particularly pleasing that participants who may not be providing system restart services, but are compelled to participate in system restart testing, will have some of their participation costs defrayed. The Energy Council suggests that the proposed draft rule could be further improved by amending the wording in proposed Rule 4.3.6(m)(2) to include more of the relevant direct costs set out in Rule 3.15.7B(a3), as follows:

“direct costs include, **but are not limited to**, fuel costs, incremental operation and maintenance costs, **incremental manning costs**, and wear and tear attributable to the specific circumstances related to the plant’s operation during the test”.

The Energy Council accepts that other costs specified in Rule 3.15.7B(a3), such as acceleration costs of maintenance work, are not relevant for the likely limited duration of a system restart test.

Any questions about this submission should be addressed to the writer, by e-mail to Duncan.MacKinnon@energycouncil.com.au or by telephone on (03) 9205 3103.

Yours sincerely,



Duncan MacKinnon
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Australian Energy Council