



7 February 2018

Ms Anne Pearson
Chief Executive
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Ms Pearson

ERC0228 National Electricity Amendment (System restart plan release provisions) Rule 2018

Ergon Energy Corporation Limited (Ergon Energy) and Energex Limited (Energex) welcome the opportunity to provide comment to the Australian Energy Market Commission regarding its Consultation Paper on the National Electricity Amendment (System restart plan release provisions) Rule 2017.

This submission, which is available for publication, is provided by Ergon Energy and Energex as distribution network service providers operating in Queensland. Ergon Energy and Energex are members of Energy Networks Australia (ENA), the national industry body representing businesses operating Australia's electricity transmission and distribution and gas distribution networks. The ENA have also prepared a response to the Consultation Paper, to which we have contributed, and we support the ENA's positions presented in their submission.

Ergon Energy and Energex support the general intent of the rule change, and in particular, actions that permit effective end-to-end development and exercising of system restart plans. Of note, we agree that changes to clause 4.8.12 to disclose system restart plans to identified parties such as Jurisdictional System Security Coordinators, Network Service Providers, and generators contracted to provide system restart ancillary services are warranted. However, we support the ENA's position in recommending not establishing obligations to provide system restart plans to market bodies or other parties that have no operational value in implementing or operationalising system restart plans.

Ergon Energy and Energex also support the proposal to provide the Australian Energy Market Operator (AEMO) the discretion to disclose the relevant information necessary to enable greater readiness in response to system restart events. However, we recommend that the revised clause is specific in listing the proposed parties to whom the information will be disclosed, and recommend only including those parties who provide operational value.

Finally, we believe that AEMO should be vested with the discretion to determine the number of system restart plans required in order to enable adequate participant readiness. For example, there is currently a need for more than one system restart plan

in Queensland and we note that the number of plans required for each state or area may differ. As such, there should be sufficient direction given to ensure participant readiness for whatever scenario the restart plan may originate from.

Should you require additional information or wish to discuss any aspect of Energy Queensland's submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Jenny Doyle', with a stylized flourish at the end.

Jenny Doyle
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