

Level 17, Casselden  
2 Lonsdale Street  
Melbourne Vic 3000  
GPO Box 520  
Melbourne Vic 3001  
tel: (03) 9290 1800  
fax: (03) 9663 3699  
[www.accc.gov.au](http://www.accc.gov.au)

Our Ref: 63795-D18/25719  
Your Ref: ERC0229  
Contact Officer: Joanna Gall  
Contact Phone: 08 8213 3461

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.

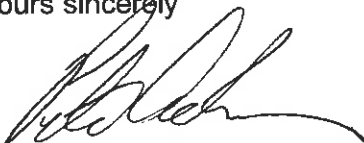
We support AEMO's proposal to amend the National Electricity Rules (Rules) to allow short notice SRAS testing in accordance with the SRAS guideline 2017.

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](mailto:Joanna.Gall@aer.gov.au).

Yours sincerely



Peter Adams  
General Manager  
AER Wholesale Markets

Sent by email on: 07.03.2018