

10 May 2018

Sarah-Jane Derby  
Australian Energy Market Commission  
Submitted via website  
AEMC reference – ERC0238

Dear Sarah-Jane,

**Re: Urgent rule change request - Reinstatement of long notice Reliability and Emergency Reserve Trader**

Thank you for the opportunity to provide comment on the Australian Energy Market Commission's (AEMC) proposal to conduct an expedited rule change process in relation to AEMOs request to reinstate the long notice Reliability and Emergency Reserve Trader (RERT) provisions.

Stanwell understand that AEMO have requested the rule change request be treated as urgent in order to allow the rule, if made, to be effectively implemented prior to the 2018-19 Summer period. Given this, Stanwell expects that AEMO is in possession of forecasts which show a non-remote chance that it will not be able to manage the system securely and reliably during summer 2018-19 without the Long Notice RERT provisions.

Stanwell is unaware of any such forecasts in the public domain, and request that this information be made available to stakeholders as part of the consultation process. Having this information available is likely to prevent an urgent rule change being unnecessarily delayed, and allow the market maximum time to deliver a low cost response.

Thank you for your consideration of Stanwell's response to the consultation paper. If you would like to discuss any aspect of this submission, please contact me on 07 3228 4529.

Yours sincerely

**Luke Van Boeckel**  
**General Manager Modelling, Analytics and Regulatory Strategy**  
**Energy Trading and Commercial Strategy**