

Neville Henderson
Australian Energy Market Commission
Level 5, 201 Elizabeth Street
Sydney NSW 2000

By online lodgement

23 March 2012

Dear Mr Henderson,

Re: Draft Determination - System Restart Standard (AEMC reference REL0045)

The private generators operating in the National Electricity Market have established an informal network to deal with issues of common concern.

The generators listed in the sidebar of this submission appreciate the opportunity to provide the Reliability Panel (Panel) with input into this important decision to determine the System Restart Standard (Standard). Australia has not suffered a major widespread interruption to electricity supplies for many years, and certainly not since the NEM commenced in 1998. Nevertheless, it is important that the Reliability Panel and the industry in general continue to apply appropriate priority to maintaining a robust and practical system restart capability, and ensure that the power system is able to recover quickly following any major disruption.

The draft determination by the Panel to essentially adopt the current interim Standard as the final Standard is supported, as the interim standard has been in use for over 5 years, and has largely been found to be suitable by both AEMO and the system restart service providers.

Before the final standard comes into effect, it is important that AEMO complete the current system restart tender process, and then review all the relevant documentation for consistency with the final Standard. The proposal outlined in the draft determination to delay the effective date of the final standard to 1 August 2013 would appear to be suitable to provide for these requirements.

The proposal for the Panel to liaise with the AEMC to request a periodic review of the Standard is supported for the reasons outlined in the draft determination. However whilst there is clearly benefit to be gained from reviews of past performance, there is also potential cost in imposing changes to standards impacting on the service providers. Any changes should therefore be carefully considered for their potential cost to existing or new system restart service providers, and should be timed so as to not interfere with existing contracts, or the tender process.

The inclusion into the Standard of a requirement for AEMO to consider fuel diversity of potential system restart standards is welcome, particularly with the expected growth in gas-fired generation sources.

Should you have any question in relation to this submission, please do not hesitate to contact either myself or Chris Deague (International Power – GDF Suez) on chris.deague@iprplc-gdfsuez-au.com or 03 9617 8331.

AGL Energy

Alinta Energy

Energy Brix

Intergen

International Power
GDF Suez

LYMMCO

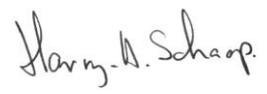
NRG Gladstone

Origin Energy

TRUenergy

PO Box 5003
Alphington
Victoria 3078

Yours sincerely,

A handwritten signature in black ink that reads "Harry-N. Schaap". The signature is written in a cursive style with a large initial 'H' and a distinct 'N'.

Dr Harry Schaap
(on behalf of the listed generators)