



20 February 2020

John Pierce
Chairman
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Mr Pierce

AEMC DRAFT RULE DETERMINATION: SYSTEM RESTART SERVICES, STANDARDS AND TESTING

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the AEMC's draft rule on system restart services. Our views on the main aspects of the rule changes are set out below.

Broader definition of system restart services. We support AEMO being able to procure a wider variety of sources for system restart. This change will allow AEMO's procurement to better account for the NEM's changing generation mix.

Generator Performance Standards We support the AEMC's decision to not include system restart services in the Generator Performance Standard. Requiring all new entrants to provide these services would be costly and lead to an inefficient barrier to entry.

Enhanced Transmission Testing We support transmission networks being responsible for more thorough testing of system restart paths. Where this testing impacts on generators, we support these generators being able to recover the direct costs through compensation.

Change to the procurement objective Origin does not support the addition of the word "overall" into the procurement objective. We consider that the current objective of procuring the lowest cost services to meet the system restart standard is clear and transparent. The addition of the term "overall" reduces clarity of the objective and requires SRAS providers to structure their bids around how they consider AEMO will define the overall costs.

Should you have any questions or wish to discuss this submission further, please contact Alex Fattal via email alex.fattal@originenergy.com.au or phone, on (02) 9375 5640.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Steve Reid".

Steve Reid
Group Manager, Regulatory Policy