



Government
of South Australia

Department for
Energy and Mining

D20009755

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235


Dear Mr Pierce

The Energy and Technical Regulation Division (Division) of the Department for Energy and Mining thank you for the opportunity to make a submission on the *National Electricity Amendment (System Restart Services, Standards and Testing) Rule 2020* draft rule determination which was issued by the Australian Energy Market Commission (AEMC) on 19 December 2019 (your ref ERC0278).

As noted in our submission to your consultation paper, the proposed rule changes seek to address some of the identified issues arising from both the South Australian Black System Event in September 2016 and the transitioning nature of the power system.

The Division supports the AEMC's draft rule determination particularly the strengthened framework for the testing of system restart paths, the broader definition of System Restart Ancillary Services (SRAS) and the clear delineation of roles and responsibilities of participants following a major supply disruption.

The Division considers that formal reporting on the testing of SRAS and system restart paths together with the proposed greater emphasis on written expectations for each of the participants involved in system restoration from a major supply disruption should result in greater confidence in a system restart procedure.

The Division supports the consultation process outlined for the testing of system restart paths and the opportunity for compensation for direct costs for impacted participants who are not otherwise compensated through other regulatory processes. These processes should allow for the currently unknown costs of the tests to be fully transparent to participants and other parties.

Energy and Technical Regulation Division

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I trust that this submission assists the AEMC in progressing the draft rule. Should you have any questions in relation to this submission, please contact Ms Rebecca Knights, Director, Energy Policy and Projects, Department for Energy and Mining on (08) 8429 3185.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Vince Duffy'.

Vince Duffy
Executive Director
Energy and Technical Regulation

20 February 2020

