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Submitted via email: sras2018@aemo.com.au

11 July 2017

Dear Sir or Madam,

System Restart Ancillary Services (SRAS) Guideline 2017 Consultation

AGL welcomes the opportunity to comment on the Consultation on SRAS Guideline Electrical Sub-Network Boundaries NSCAS Tender Guidelines Issues Paper (Paper).

AGL is one of Australia's leading integrated energy companies and largest ASX listed owner, operator and developer of renewable generation, providing energy solutions to over 3.7 million customers throughout eastern Australia.

AGL supports the majority of proposals AEMO has put forward in the paper. In particular, AGL considers that allowing potential SRAS providers to contact AEMO at any time provides additional flexibility in the procurement of SRAS and allows SRAS arrangements to respond more quickly to changes in the market.

While AGL supports the inclusion of two tests to ensure SRAS can be provided within the nominated specifications, the twenty-four-hour notice period proposed for the second test is problematic. The test will require substantial down-time for an SRAS unit. Twenty-four hours' notice does not give SRAS providers enough time to ensure their operational position is protected while they are testing the SRAS unit. AGL proposes that the SRAS guidelines adopt a mechanism whereby the SRAS operator has a right of reply. This reflects that there are some instances where a delay in testing would be justified. For example, if an SRAS provider already has several generating units offline for maintenance. A right of reply mechanism could allow generators to cite one of an agreed list of reasons when requesting a rescheduling of the test with AEMO.

AGL also considers that the additional performance certainty achieved by a second test comes with a cost. Tripping off a unit from a full load is a very strenuous test that will place an extra burden on every component in the system. When designing the testing framework AEMO may wish to consider factors that



will reduce the substantial additional maintenance incurred through two tests. One potential option could be conducting the tests at a reduced load.

If you have any queries about this submission or require further information, please contact Brigid Richmond at brichmond@agl.com.au or on 03 8633 6631.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Camroux'.

Simon Camroux

Senior Manager, Wholesale Regulation