

23 September 2020

Charles Popple  
Chair  
AEMC Reliability Panel



Dear Mr Popple,

### **Submission to System Restart Standard review consultation paper**

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon people who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the Reliability Panel's consultation paper on the System Restart Standard review 2020.

### **Expanding the range of system restart services**

PIAC supports expanding the range of providers of System Restart Ancillary Services (SRAS) as determined in the AEMC's earlier rule change. This is an opportunity to update the procurement and operation of SRAS in order to bring it in line with the evolving NEM and provide the level of system resilience that consumers are willing to pay for.

### **Interconnectors and network business provision of SRAS**

The NEM is becoming more interconnected, with the ISP optimal development path planning new interconnectors and upgrades to national transmission flowpaths. It would be short-sighted to rule out interconnectors as a possible SRAS source to complement currently eligible providers in order to deliver the most prudent and efficient option.

We agree with the Panel that the provision of SRAS by network businesses would be a departure from the current framework, but it must not be dismissed out of hand. Instead, it should be examined further to develop how the current framework may be reformed to allow it where appropriate.

For instance, SRAS could be provided as a regulated service by a regulated network business or as part of the license obligations of either a regulated or merchant interconnector. Both of options allow interconnectors to contribute to SRAS where prudent yet maintain regulatory oversight and transparency of the costs incurred.

**Continued engagement**

PIAC would welcome the opportunity to meet with the Reliability Panel and other stakeholders to discuss these issues in more depth.

Yours sincerely,

**Miyuru Ediriweera**

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