



SRAS Guideline Consultation  
Australian Energy Market Operator  
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**Response: System Restart Ancillary Services (SRAS) Guideline Review (Draft Report published 3 August 2020 for review)**

Thank you for the opportunity to submit a response to the draft report of the updated SRAS Guideline.

Specifically, this response concerns the *Queensland Sub-Networks proposal* as proposed and described in 'SYSTEM RESTART ANCILLARY SERVICES GUIDELINE 2020 – 3.5 Boundaries of electrical sub-networks'.

In my role as Queensland Jurisdictional System Security Coordinator (JSSC), I have concerns on the proposal to reduce the number of Queensland subregions for the purpose of system restart, from two to one. This reduction has the potential to impact on the restoration of Queensland's sensitive load.

As part of the proposed change, [REDACTED] SRAS generators would be contracted overall for Queensland, rather than [REDACTED] in each Southern and Central Queensland. The concern is that the location of the contracted Generators is not specified, and could therefore potentially all be located in the southern part of Queensland at the time of the event.

If there was no SRAS Generator available in Central Queensland, Powerlink does not believe it will be possible to use [REDACTED] Central to Southern Queensland (CQ-SQ) paths in the early stages of a restart to Queensland's sensitive load [REDACTED]

In order to provide a suitable return for Queensland's sensitive load, it is preferred that [REDACTED] contracted SRAS generators would need to be [REDACTED] in Central Queensland (CQ) – an outcome not assured under the proposal. This allows for one generator being unavailable (maintenance or damage in network black) and the need to [REDACTED]

A preferred outcome arising from concerns listed above would be to secure [REDACTED] contracted generators in the central area and a suitable southern combination, increasing the opportunity for successful system restoration of Queensland's sensitive load and Queensland as a whole.

[REDACTED]  
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