

8 September 2020



SRAS Consultation
Australian Energy Market Operator

Submitted via email.

Dear SRAS Consultation team,

Draft System Restart Ancillary Services Guideline

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 Australian Energy Market Operator's (AEMO) second stage of consultation on the draft System Restart Ancillary Services (SRAS) Guideline (the Guideline).

PIAC supports the draft guideline as we consider it supports the SRAS procurement objective of meeting the Reliability Panel's system restart standard at the lowest long-term cost.

PIAC supports AEMO keeping the SRAS Guideline principles-based rather than prescriptive as we consider allowing AEMO to use its discretion in procurement will better support achieving the procurement objective.

Therefore, we disagree with the suggestions from some stakeholders to limit the maximum SRAS contract duration to minimise the risk of locking in poor performance or creating barriers to new services. Some new providers may require longer-term agreements to help bring innovation into system restart and support services. Placing a limit on contract duration in the Guideline may unduly prevent AEMO from entering into otherwise efficient, low-cost agreements and prevent achieving the procurement objective.

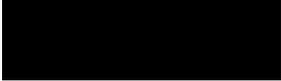
We welcome the opportunity to discuss this matter in further detail with AEMO.

Yours sincerely


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