



John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

6 February 2018

Submitted online: www.aemc.gov.au

REF: ERC0228

ffaDear Mr Pierce

SYSTEM RESTART PLAN RELEASE PROVISIONS – CONSULTATION PAPER 2018

Origin Energy Limited (Origin) welcomes the opportunity to comment on the AEMC's System Restart Plan consultation paper. Overall, Origin is comfortable with the proposal to share system restart plans with relevant NEM participants, where it can aid in the process of restoring the network following a major supply interruption.

Origin has two reservations around confidentiality of commercial information that should be addressed by the AEMC.

Firstly, commercial contracts between AEMO and an SRAS provider, which detail the payment levels for their service and other commercially sensitive information, should remain confidential between AEMO and the SRAS provider and not disclosed to third parties under any circumstances. This would include all registered participants and members of the Reliability Panel. The operational nature of the system restart plan should preclude this from occurring, however it is important to highlight this issue to remove any ambiguity.

Secondly, AEMO's proposes to share a system restart plan with various parties including: jurisdictional system security coordinators (JSSC), network service providers, contracted generators of SRAS services, any other registered participant who can assist in system restart and the Reliability Panel.

Under the NER clause 8.6.1 registered participants must use all reasonable endeavours to ensure that confidential information passed to them, remains confidential. Chapter 2 of the NER defines which parties are registered participants and covers all the parties identified by AEMO, except the JSSC. As the JSSC is not a registered participant, under the rules they are not subject to the same confidentiality requirements as the other parties who are identified by AEMO as potential recipients of confidential information. The AEMC should investigate the appropriate confidentiality provisions that a JSSC is subject to and ensure that they must also maintain confidentiality of any information that is passed to them through the System Restart Plan.

Should you have any questions or wish to discuss this information further, please contact James Googan on james.googan@originenergy.com.au or (02) 9503 5061.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Steve Reid".

Steve Reid
Group Manager, Regulatory Policy