



10 December 2020

Graham Mills  
Australian Energy Market Commission (AEMC)  
Sydney South NSW 1235

Submitted online to: <https://aemc.gov.au>

Dear Graham,

**RE: Reliability Panel – Review of the system restart standard 2020 (Ref: REL0077)**

This submission is provided in the capacity as Jurisdictional System Security Coordinator (JSSC) for Queensland.

A submission to the *Review of the Determination System Restart 2020* (the Review) has previously been provided by Powerlink. I have reviewed the submission and support the issues identified.

With consideration of the obligations under Chapter 4 of the National Electricity Rules, in my capacity JSSC for Queensland, I have engaged with the sensitive load customer to raise awareness regarding the proposal for a single sub-network in Queensland for System Restart Ancillary Services (SRAS) procurement purposes. In my discussion with the sensitive load customer the following preliminary and key critical issues were identified:

- The sensitive load customer has very specific energy restart staging requirements following a system black event.
- Ensuring that there is at least one SRAS capable generator contracted in the vicinity of the sensitive load.
- At this time, SRAS should only be contracted with a synchronous generator.

In light of the materiality of the issues identified above, I support that the AEMC (and AEMO) contract a service to provide SRAS for the area north of Bundaberg, similar to the arrangement already in place for New South Wales as outlined in the AEMO SRAS Guideline, Section 2.4, Table 1.

As JSSC, I would welcome the opportunity to participate in the testing of the SRAS as support for a positive outcome.

Kind Regards,

A handwritten signature in black ink that reads "Gary Edwards".

Gary Edwards

Jurisdictional System Security Coordinator, Queensland

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