



AGL Energy Limited

T 02 9921 2999

F 02 9921 2552

agl.com.au

ABN: 74 115 061 375

Level 24, 200 George St

Sydney NSW 2000

Locked Bag 1837

St Leonards NSW 2065

Australian Energy Market Commission

16 October 2025

Review of the System Restart Standard Draft Determination

AGL Energy (AGL) welcomes the opportunity to respond to the Australian Energy Market Commission (AEMC) Review of the System Restart Standard Draft determination.

Support for the Panel

AGL welcomes the Panel's recommendations and the forward-looking perspective, which complements the evolving treatment of other Essential System Services (ESS). Sustaining this direction may assist in managing diverse stakeholder perspectives and fostering greater alignment across the sector.

System restart is a critical service with distinct operational requirements. While not directly comparable to other ESS, the planning and modelling approach adopted in this review may provide valuable guidance for the design of future service frameworks.

Framework design and technical approach

AGL considers the proposed dual-pathway restoration timeframe model which features two-hour and eight-hour restoration options as a flexible approach that supports more effective system restart planning. The two-hour pathway is expected to rely on contracted restart-capable generators, while the eight-hour pathway may enable participation from market-based services, including batteries. This structure offers a mechanism to balance restoration speed, cost efficiency, and system resilience.

The approach of requiring each subnetwork to independently achieve a 50% restoration threshold appears to avoid regional prioritisation and may help address concerns around equitable treatment of industrial and residential load types, particularly in the context of large industrial facilities.

While batteries are not anticipated to initiate system restart, they may play a meaningful role in broader system restoration and support services. AGL recognises the potential of grid-forming technologies and service stacking. However, additional clarity regarding their operational deployment would support more informed engagement.

Operational clarity in System Restart Planning

AGL notes that while transitional services have not yet progressed beyond conceptual discussions to date, this is not due to limitations in the NER. As noted in the Draft Determination, the Panel has found that the NER already provides AEMO with sufficient flexibility and discretion to support the specification and procurement of SRAS. That said, we note the Panel has identified some amendments to the Standard to provide greater flexibility. As explained in more detail below, we consider this work is urgent and that AEMO should act as soon as possible.

We consider practical trials and contracting should assist in clarifying how these services are intended to function operationally and would enhance transparency regarding their role within the system restart framework.

Encouraging broader technology consideration for restart services

We support the Panel's emphasis on the urgency of preparing for system restart in a future energy system with higher renewable penetration. With coal closures approaching, it is important that AEMO begins planning now for how restart services will operate under these changing conditions. We agree with the Panel's encouragement for AEMO to consider a broader range of technologies to deliver restart capability.



Clearer guidance on the types of technologies being considered could help incentivise innovation and investment in emerging solutions.

Clarifying the role of networks in competitive restart services

As competitive approaches to system restart services continue to evolve, it is important that the role of network operators is clearly defined to support effective market outcomes. While network operators may be involved in planning and coordination, their role should not extend into areas that influence the structure or delivery of competitively procured services.

To ensure restart services are delivered at the lowest long-term cost to consumers, regulatory frameworks should incentivise competitive procurement from a broad range of providers. Clearly delineating responsibilities will help maintain competitive neutrality, promote transparency, and support efficient market outcomes aligned with the National Electricity Objective.

If you have queries re this submission, please contact Darshitha P P on DPutoorPisharam@agl.com.au

Yours sincerely,

Chris Streets
Senior Manager Wholesale Markets Regulation

About AGL

Proudly Australian since 1837, AGL delivers around 4.6 million gas, electricity, and telecommunications services to our residential, small, and large business, and wholesale customers across Australia.¹ AGL operates the largest electricity generation portfolio in Australia of any ASX-listed company, with a total operated generation capacity of almost 8000 MW across Australia. AGL is Australia's largest privately-owned hydro power station operator and operates the largest portfolio of renewables and storage assets of any ASX listed company. Since 2006, AGL has invested billions of dollars in the construction and delivery of over 2 GW of renewable and firming capacity in the National Electricity Market.

¹ Services to customers number is at 30 June 2025