



17 October 2007.

Dr John Tamblyn  
Chairman  
Australian Energy Market Commission  
PO Box H166  
Australia Square NSW 1215

Dear Dr Tamblyn

### **Timing of SRAS testing – Additional round of consultation**

The National Generator Forum (NGF) wishes to thank the AEMC for the opportunity to make comments on additional round of consultation for the above rule change proposal.

The majority of System Restart Ancillary Services (SRAS) in the NEM are supplied by NGF members. As such, we have taken a great interest in the development of the SRAS tender guidelines being conducted by NEMMCO.

We have reviewed the proposal by the Commission to substitute the term “excluded services” in clause 3.11.5(f)(2) of the National Electricity Rules with the defined term “negotiable services”.

In our view, this change proposal will provide generators with access to a negotiate/arbitrate framework to govern negotiations with a TNSP on the price of the service offered. In the event of disagreement, utilisation of this robust framework would provide access to an independent arbitrator to determine the fair and reasonable price of the service offered. Under the current drafting, generators may be at a disadvantage with respect to the monopoly position of TNSP's, which may not be consistent with the market objective.

On this basis we believe the proposed rule change is consistent with the market objective, and support it being expedited.

If you have any further questions, please contact James Hutt on 07 3222 9369.

Yours sincerely

A handwritten signature in black ink, appearing to read "JBoshier", is centered below the text "Yours sincerely". The signature is written in a cursive, slightly slanted style.

John Boshier  
Executive Director