



20 February 2020

Mr John Pierce AO  
Chairman  
Australian Energy Market Commission

Lodged via AEMC website

Dear Mr Pierce,

**ERC0278: SYSTEM RESTART SERVICES, STANDARDS AND TESTING – DRAFT DETERMINATION**

The Clean Energy Council (CEC) is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in renewable energy and energy storage along with more than 6,500 solar and battery installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC welcomes the opportunity to comment on the Australian Energy Market Commission's (AEMC) draft determination on the system restart services, standards and testing rule change. The CEC supports the AEMC's more preferable draft rule. We believe it addresses a number of the identified challenges arising under the existing frameworks governing the procurement, test and deployment of System Restart Ancillary Services in order to provide the Australian Energy Market Operator with the tools needed to effectively prepare for and respond to major supply disruptions in the future. We particularly support that the AEMC has not accepted the proposal to add a new generator access standard requiring all new generators be capable of providing restoration support services, which we had suggested in our earlier submission would have been overly conservative and duplicative.

If you would like to discuss any of the issues raised in this submission, please contact me, as outlined below.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lillian Patterson', is written over a light blue horizontal line.

Lillian Patterson  
Director Energy Transformation  
(03) 9929 4142  
[lpatterson@cleanenergycouncil.org.au](mailto:lpatterson@cleanenergycouncil.org.au)