From: @agl.com.au>
Sent: Wednesday, 9 September 2020 3:06 PM

To: SRAS Consultation

Cc:

Subject: RE: Delayed submission to draft SRAS guideline

Hello

Unfortunately we have been unable to hit the extended time you kindly provided to make a submission on the draft guideline. Fortunately we largely support the changes to the guideline in response to the initial consultation. We therefore support the changes you have made to the guideline and consider they are appropriate. We appreciate the consultation team's constructive approach to the issues we had raised and the solutions you have proposed appear to strike the right balance of technical guidance required under the guideline.

Of course our concerns remain regarding long term contracting and the importance of considering the downside risks as well as the upsides. I appreciate AEMO has now stated this is appropriately reflected in the factors under the guideline. Whilst we would prefer an express delineation of the down side risks, we appreciate AEMO's clarification on how you interpret these factors.

I will also note our continued concern internally about how AEMO will consult with test-participants and non-test participants affected by a restart path test. This concern is in part driven by the uncertainty in how AEMO will approach these types of required tests. We therefore support the express AEMO requirement under 4.5.1(d) and consider it is important to clarify who AEMO will consult with in the event of an restart path test.

My apologies for not providing our feedback through a formal submission but I hope the above comments of assistance.

Kind regards