Appendix C Format for submissions

Establishing an Emergency Response Scheme

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| Submitter |  |

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| Questions | Comments |
| 1. Do you agree with our rationale for establishing an ERS? Why/why not? |  |
| 1. Are there other factors or risks you consider relevant to our decision to implement an ERS? |  |
| 1. Do you agree with our proposal that only demand-side flexibility, including by industrials and aggregations of smaller consumers, should be eligible to provide ERS? |  |
| 1. Are you aware of any off-market generation or batteries that may not be activated in an emergency if they are not included in an ERS? Please provide details of the type and scale of these resources. |  |
| 1. Do you agree with our proposed design elements for procurement of ERS by the System Operator, including the procurement process, timing and trigger? |  |
| 1. Do you consider that procurement up to 4 weeks in advance of an identified need, coupled with a pre-approved panel of providers, will be effective and provide adequate time for potential providers and the System Operator? |  |
| 1. Do you agree with our proposed pre-activation and activation processes for use of ERS? |  |
| 1. Do you agree that the System Operator should be required to update relevant planning processes to take account of forecast uncertainty? If so, how do you consider this should be done? |  |
| 1. Do you agree with our proposed compensation and price settings for the ERS, including proposed measures to ensure overall unit costs do not exceed VoLL? |  |
| 1. Do you consider that the System Operator should also be required to ensure overall costs during an ERS activation are less than VoLL? If so, how do you consider this could be practically achieved in the available time? |  |
| 1. Do you agree with our proposal to ‘add back’ activated ERS into nodal load schedules to maintain scarcity pricing? |  |
| 1. Do you agree with our proposed settings for cost allocation and settlement of ERS costs? Do you consider an alternative cost recovery approach would be preferable and if so why? |  |
| 1. Do you agree with our proposed settings to manage non-performance by ERS providers? |  |
| 1. Do you agree with our proposed information and publication settings to enable the effective operation and monitoring of the ERS? Is there additional information you consider should be made available to potential providers, the Authority, other industry participants or the public? |  |
| 1. Are there other scheme design elements that the Authority should consider? |  |
| 1. Do you agree with our high-level evaluation of the proposed ERS against our guiding principles? |  |
| 1. Is there any additional information the Authority should consider in evaluating a proposed ERS design? |  |
| 1. Do you think there are any elements of the proposed scheme design which require more time for implementation and should be delayed beyond Winter 2026? If so, please identify the relevant elements and indicate when you consider they could be implemented. |  |
| 1. Do you agree with the Authority’s proposal to set VoLL at $35,305 per MWh for the purposes of the ERS, and proposal to review VoLL and security standards more broadly? |  |
| 1. Are you likely to be interested in participating in an ERS, such as the scheme outlined in this paper? |  |
| 1. Are there any other implementation considerations or related issues the Authority should consider in relation to an ERS? |  |
| 1. Are there other matters that the Authority should consider in relation to an ERS? |  |