

17 February 2015

Christian Zurr
Australian Energy Markets Commission
PO Box A2449
Sydney South NSW 1235
Submitted via AEMC website: Ref ERC0168

Dear Mr Zurr,

RE: Draft Determination on System Restart Ancillary Services Rule Change.

Rio Tinto Aluminum (Bell Bay) Limited trading as Bell Bay Aluminum (BBA) is pleased to make the following submission in relation to the draft determination on System Restart Ancillary Services (SRAS) that was published on the 18th December 2014.

Bell Bay Aluminium located in Northern Tasmania, is a major stakeholder in Tasmania and the Tasmanian electricity market, and is the State's largest electricity consumer, consuming more than 25% of the State's electricity demand.

We recognise that SRAS services are very important to have in place to support reconnection of an aluminium smelter in a timely manner, however these services must be cost competitive. The proposed rule change highlights that all generators should review their own bidding strategies to avoid possible price increases. We would challenge why with the current rule in place, although the costs are smeared across the National Electricity Market, regional generators are not providing the service at the lowest cost possible.

Bell Bay Aluminium does not support any rule change which increases the cost of energy to the consumer. The proposed rule change puts Tasmanian customers at a disadvantage within the National Electricity Market.

Should any further information be required on this request, please do not hesitate to contact me.

Yours Sincerely,

Leigh Darcy

Principal Advisor Power Supply