

Review of procedures and guidelines

Regulatory Business Case
FY2028–32 System Control and Market
Operator Charges Review

Contents

1. Overview	2
2. Identified need	4
3. Options analysis	6
3.1 Options assessment	6
4. Recommended option	9
4.1 Strategic alignment	9
4.2 Dependent projects	10
4.3 Deliverability	10
4.4 Customer considerations	10
4.5 High-level scope	11

1. Overview

This business case seeks approval for a step change in operational expenditure to enable NTESMO to implement a structured, professionally supported program for the periodic review and amendment of its procedures and guidelines during the FY2028–32 regulatory period. These instruments underpin NTESMO's statutory obligations under the *Electricity Reform Act 2000* (NT), the Northern Territory National Electricity Rules (NT NER) and the System Control Technical Code (SCTC, to be superseded by the Territory Electricity Market rules), ensuring safe, stable, secure, reliable and efficient operation of the power system and wholesale market.

Historically, reviews have not been complete due to resourcing constraints. More recently the reviews have been undertaken but without dedicated professional support, resulting in regulatory risk, operational misalignment, and inconsistent document quality. As the power system evolves with increasing complexity and integration of renewable energy, these risks will escalate unless a structured review program is established. That said, the existing resource base of NTESMO does not accommodate undertaking these necessary consultations on an enduring basis. The funding requirement outlined in this regulatory business case entitled 'Review of procedures and guidelines' is essential to ensure the conduct of future consultations and updates to the Secure System Guideline and procedures.

The proposed step change will fund external technical and economic expertise to complement NTESMO's internal resources, ensuring reviews are timely, consultative, and consistent with best industry practice. This will deliver:

- Reduced risk of non-compliance with regulatory obligations
- Improved quality and usability of operational documents
- Enhanced internal capability through collaboration with industry experts
- Greater transparency and stakeholder confidence in NTESMO's processes.

The estimated cost of this program is \$1.5 million over five years, with annual operational expenditure of \$300,000 (real FY25 dollars), as shown in Table 1.

Table 1 Annual capital and operational expenditure (\$'000, real FY25)

	FY28	FY29	FY30	FY31	FY32	Total
Capex	0	0	0	0	0	0
Opex	300	300	300	300	300	1,500
Total	300	300	300	300	300	1,500

This regulatory business case has been prepared on the basis of real \$FY2025 and all figures are in \$FY2025 unless otherwise stated. For the purposes of the FY2028–32 System Control and Market Operator Charges Review Initial Proposal, the annual capital and operational expenditure have also been escalated and presented in forecast \$FY2027 dollars and classified by NTESMO function and regulatory cost category as per the table below.

Table 2 Annual capital and operational expenditure (\$'000, real FY27)

Function	Cost Category	FY28	FY29	FY30	FY31	FY32	Total
Market Operator	Professional Fees	.323	323	323	323	323	1,614

Note: Numbers may not add due to rounding.

2. Identified need

NTESMO maintains a suite of procedures and guidelines that give operational effect to its system control and market operator functions under the *Electricity Reform Act 2000* (NT), the NT NER, the System Control Licence and the System Control Technical Code (SCTC, to be superseded by the Territory Electricity Market (TEM) rules). These instruments are relied upon by NTESMO, System Participants and market participants to understand and comply with mandatory technical, operational and market requirements. The current list of NTESMO codes, procedures and guidelines is set out at Appendix A (noting that Communications-related guidelines and procedures are not included in the professional fees estimate and are the subject of a separate business case).

While the legislation and Rules do not prescribe a fixed review cycle for each instrument, NTESMO has a regulatory obligation to ensure that its procedures and guidelines remain accurate, effective and fit for purpose on an ongoing basis. This obligation arises from:

- NTESMO's statutory duties to monitor and control the power system and operate the wholesale market safely, securely, reliably and efficiently under the *Electricity Reform Act 2000* (NT);
- licence conditions requiring compliance with, and effective implementation of, the SCTC (and in future the TEM rules), including maintaining operational frameworks that support secure system operation;
- NT NER provisions that require market and system control functions to be exercised only in accordance with valid and current procedures, and which mandate consultation when such instruments are made or amended; and
- Utilities Commission oversight, under which NTESMO must be able to demonstrate that its regulated functions are supported by contemporary, transparent and consultatively developed instruments.

Collectively, these requirements mean that NTESMO must actively review and update its procedures and guidelines whenever changes in technology, system configuration, market design or operational practice occur.

Until recently, this obligation had largely been discharged on a reactive, issue-driven basis, without a dedicated and sustained resourcing model for systematic review and renewal. This approach had resulted in the following:

- Regulatory risk – Scheduled document reviews not able to be executed fulsomely or with the level of industry engagement warranted and documents without prescribed review dates never being reviewed and becoming out of date in terms of content and cross-referencing
- Operational misalignment – Operational practices evolving ahead of approved procedures and guidelines
- Document quality and usability issues – Inconsistent document templates, titles and cross-referencing and an absence of a clear structure to cataloguing resulting in difficulty for operators and industry participants in identifying and applying current requirements.

As the power system continues to evolve in complexity, these risks will increase unless a structured, ongoing review program is established.

As part of the FY2025–27 Regulatory Proposal, a new NTESMO function, Rule Development, Technical and Policy Advice (Market Operator), was established with responsibility to review codes, guidelines and procedures. Funding sought and approved for this function in the FY25–27 regulatory period included funding for internal resources; but not for professional fees for external technical and economic support for the reviews.¹

Demonstrating NTESMO’s resulting increased capacity and maturity, in 2025-26 NTESMO published a forward-looking industry consultation schedule for the first time. However, the absence of professional fees budget in the future will pose a barrier to having the resource bandwidth required to professionally execute reviews with the requisite input from industry and consistent with best industry practice. The expansion of the functions of NTESMO as an independent statutory entity will result in resource constraints that need to be addressed to ensure that the regulatory reviews are conducted and conducted in a professional manner.

¹ NTESMO 2026, *NTESMO Industry Consultation Schedule - updated 2025/26*, <https://ntesmo.com.au/consultations/notice-of-industry-advice-ntesmo-industry-consultation-schedule> (accessed 14 January 2026).

3. Options analysis

To address the identified need, NTESMO considered two options summarised in Table 3.

Table 3 Options for the conduct of the regulatory review process

Options	Description
Option 1: Periodic reviews without industry professional support (base case)	It is assumed that the existing internal resource capacity would be prioritised to undertake the periodic review and amendment of procedures and guidelines without the sourcing and procurement of technical and economic expertise to support the review and design of amendments. The seasonal review is expedited on a periodic basis and subject to a biennial rolling plan updated on an annual basis.
Option 2: Professional service support for periodic review and industry consultations	Review and consultation would be facilitated by utilising existing internal resource capacity complimented by the procurement of professional expertise to provide specific support in independently reviewing work practices and design and implementation of amendments. The industry professional support would extend to supporting the review of consultation feedback. The seasonal review is expedited on a periodic basis and subject to a biennial rolling plan updated on an annual basis.

3.1 Options assessment

This section describes the options that were analysed to address the increasing risk and identify the recommended option. The options are analysed in a qualitative manner, and the justification of the preferred option was purely based upon mitigating the risk of a breach of regulatory obligations, the cost of which is indeterminable.

Table 4 Summary of options analysis

Assessment metrics	Option 1	Option 2
Capex (\$'000, real FY25)	0	0
Opex (\$'000, real FY25)*	0	\$1,500
Meets customer expectations		
Technical Viability	N/A	N/A
Deliverability		
Preferred		

-  Fully addressed the issue
  Adequately addressed the issue
  Partially addressed the issue
  Did not address the issue

* Note the opex is defined as the professional service fees associated with the review and consultations and not the overall cost of the review and consultation process.

3.1.1 Option 1 – base case

All activities associated with reviewing and amending guidelines and procedures would be facilitated by the Manager Market Reforms and Central Planning, supported by assignment of internal resources to conduct the reviews, assemble the materials for consultation, conduct the consultations and give effect to the amendments. External professional expertise would not be procured and engaged to support any of the review processes.

The benefits afforded by this option are:

- No material step-change revenue to support the requirement.
- Further self-development of internal expertise by virtue of lived experience pertaining to regulated power system management. This benefit is deemed somewhat less advantageous compared to procurement of professional expertise because there is limited opportunity for accelerated development through mentoring by the principal consultant engaged to support the process.

The detriments identified for this option are:

- More substantive burden on NTESMO's core capability leading to prolonged and often delayed reviews.
- The quality of review and amendments is likely to be of a lower standard as they would not have been subject to specialist input and review by independent industry expertise with sufficiently broad industry experience across multiple jurisdictions.
- There is a heightened risk of breach of regulatory obligations for assuring routine review of publications coupled with timely review of these.

3.1.2 Option 2 – Support through engagement of professional services

Review and consultation would be facilitated and expedited utilising existing internal resource capacity complemented by the procurement of professional expertise to provide specific support to independently review work practices and design and review implementation of amendments. The industry professional support would extend to advice on consultations and review of feedback. The seasonal review is expedited on a periodic basis and subject to a biennial rolling plan updated on an annual basis.

The benefits afforded by this option are:

- Scheduled reviews are executed professionally with the requisite input from industry for necessary amendments.
- Development of a more professional suite of reference guidelines and procedures that are consistent with best industry practice. Consistent references and standard templates in force that are catalogued in a logical sequence online in a timely manner to afford sufficient visibility to industry participants.
- Procedures and guidelines remain abreast of evolving operational practices without being out of step with necessary changes.

- Significant further development of internal expertise due to mentoring of internal resources by professional expertise. This directly accounts for a more capable workforce that has the capacity to respond to changing needs for the industry.
- Reduction in the risk of breach of regulatory obligations arising from delayed or deferred procedural reviews.
- Increased capacity to review a higher volume of materials commensurate with an increasing complexity of regulated power system into the future thereby reducing the risk of deferred reviews.

The detriments identified by this option are:

- Step change increase in operational expenditure allowances placing incremental upward pressure on System Control and Market Operator charges.

The estimate of annual hourly breakdown has been determined to be 890 hours with a total cost of \$299,819 based upon average unit rates for principal consultants across six incumbent professional service providers.

The forecast annual cost has been derived as follows:

- The average hourly rate of \$336.88 (for a principal consultant averaged across the 6 panel consultants contracted to the NTESMO Professional Services Panel ref: RFT0309 2025).
- A provision of 20 hours to support the annual review and update of the code, procedure and guideline biennial schedule.
- Technical and economic expertise procured for an estimated 20% of time across a schedule of four expedited consultations per annum.
- The reference expedited consultation is the Secure System Guidelines Version 5.0 amendments that accounted for 910 personnel hours between April and November 2025. 20% of the scheduled hours accounts for 190 hours. This has been applied to all consultations over the period.
- A provision of 110 hours for the strategic support and advice for minor consultations and code reviews facilitated by the Utilities Commission and Government.

4. Recommended option

The options analysis presented in the previous section has identified **Option 2 - Professional service support for periodic review and industry consultations** at an estimated cost of **\$1.5 million** to be most prudent and cost effective to meet the identified needs.

The expenditure is outlined in Table 5.

Table 5 Annual capital and operational expenditure (\$'000, real FY25)

	FY28	FY29	FY30	FY31	FY32	Total
Capex	0	0	0	0	0	0
Opex	300	300	300	300	300	1,500
Total	300	300	300	300	300	1,500

4.1 Strategic alignment

Power and Water's Strategic Plan has two goals – modernising our business and embracing a sustainable future with innovation.

This proposal aligns with Power and Water's Strategic Plan Goals and Objectives as indicated in the Table 6.

Table 6 Alignment with Power and Water's Strategic Plan

Goal	Objective	Alignment
Modernising our business	Delivering sustainable value safely and reliably for our customers and community	Establishes a structured, ongoing and professionally supported review of procedures and guidelines, ensuring they remain current, fit for purpose and aligned with evolving operational and regulatory requirements, thereby reducing compliance risk and supporting safe, reliable power system operation.
	An empowered and high performing workforce	Builds internal capability through mentoring and collaboration with industry experts, enabling staff to develop deeper regulatory, technical and consultation expertise while reducing reliance on reactive or ad-hoc work practices.
	Successful investments in core systems and capability to improve efficiency and value of service	Strengthens core regulatory and operational capability by standardising, modernising and systematically managing the suite of operational documents, improving efficiency, consistency and transparency in system control and market operation activities.
Embracing a sustainable	Structuring, facilitating and enabling	Timely review and amendment of procedures and guidelines considering the renewable energy transition

future with innovation	infrastructure and innovations that support the: • Renewable energy transition; and • Achievement of economic growth targets	and economic growth targets further enables the smooth transition as well as assures the efficient utilisation of renewable resources across the regulated power systems.
	Proactively adopting government policy for a clean and secure energy future	Best practice procedures and guidelines professionally undertaken lends itself to giving effect to Government policy settings that are subject to ongoing reform.
	Partner with customers and stakeholders to create innovative solutions	Through following best industry practice by procuring industry expertise to support development and consultation further fosters a collaborative working relationship with industry that harnesses the best practice and innovative recommendations from participants as evidenced with the 2025 consultations pertaining to Market Interactions Enablement, Secure System Guidelines Version 5, and the Scheduling and Dispatch procedural amendments.

4.2 Dependent projects

Not applicable.

4.3 Deliverability

This step change in operational expenditure will be utilised to procure and engage professional technical and economic services providers, where applicable to support the delivery of relevant publications through a consultative approach in a timely manner.

Through engaging the professional expertise during specific elements of the review process, delivery of the review, amendment and consultation process is assured in a timely manner within forecast budget.

4.4 Customer considerations

As required by the Utilities Commission, in developing this program NTESMO has taken into consideration feedback from its customers.

NTESMO tabled the proposed expenditure as an FY2028–32 Regulatory Proposal step change at the stakeholder consultation workshop on 11 December 2025 and there were no objections to the rationale and cost of the step change. Evidence from the ongoing procedural and guideline review plan during 2025 has been favourably supported by stakeholders and it is understood that stakeholders place high value on participating in the periodic review and amendment of procedures and guidelines. NTESMO has published

its consultation plan and its regulatory review process on the NTESMO website on its consultation subpage².

4.5 High-level scope

Procedure and guideline reviews, that include industry consultations subscribe to periodic cycles that are planned annually as follows:

- Market Operator - March and September
- Power System Controller - May and November.

By exception, from time-to-time, consultation of critical matters may be required outside this cycle.

Keeping participants informed of progress is valued and therefore NTESMO provides regular updates to participants regarding the broader consultation plan and any variations to the plan.

NTESMO publishes conceptual and methodology discussion papers appended to proposed procedural and guideline developments and seeks feedback from participants as part of the consultation process.

Consultations follow the NER (NT) Chapter 8.9 Rules³ Consultation Procedures that provide a practical basis for consultation, now well established across the electricity supply industry. Each proposed development or amendment follows this process as either a standard, expedited or minor consultation, with associated rationale for the type of consultation being applied.

There are three types of consultation defined within the NER (NT) Chapter 8.9 as follows:

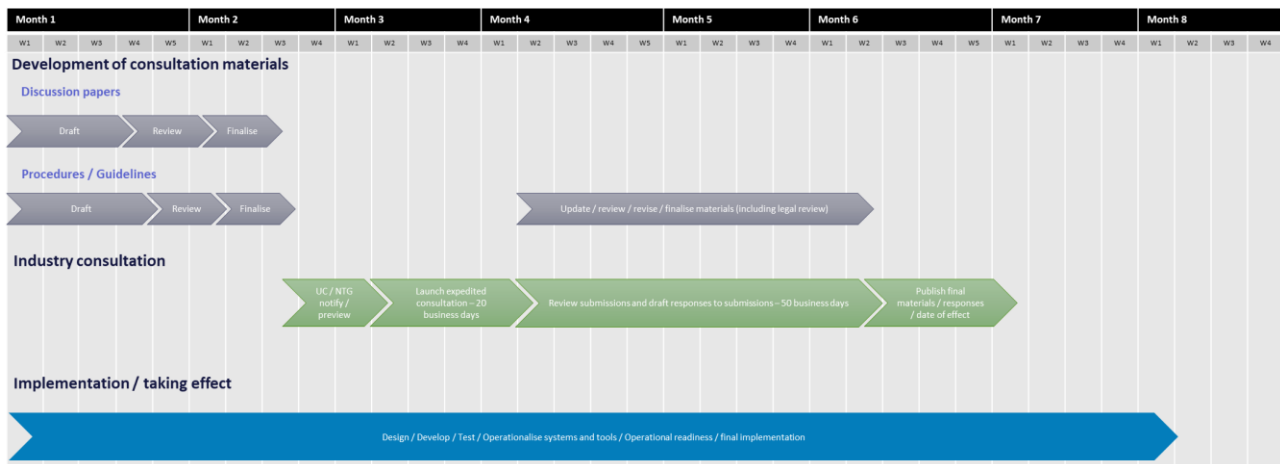
- **Standard consultation (8.9.2):** a consultation where new rules or concepts are tabled through discussion papers prior to the consultation of the development and amendment of procedures or guidelines. This process would endure for a minimum of 6 months and could extend for up to 12 months and beyond.
- **Expedited consultation (8.9.3):** the most likely consultation to be utilised for the amendment of procedures or guidelines where the amendments are tabled together with any discussion papers and rationale for the changes. The process would endure for approximately 6 to 8 months.
- **Minor consultation (8.9.4):** usually only expedited where there are minor amendments to the format and structure of materials and is the shortest duration form of consultation. The process would endure for approximately 4 months.

The typical schedule for the review and expedited consultation process is presented in Figure 1 below. The duration of each consultation is contingent upon the preparatory works undertaken prior to launching the consultation and can vary dependent upon the theme and specific topics being covered:

² [Consultations | NTESMO](#)

³ NER (NT) - v125 - Chapter 8 - Part F Rules consultation procedures, Section 8.9 page 808

Figure 1 - Typical schedule for expedited consultation process



The allocation of time for external professional expertise with both direct technical and commercial capability has been derived as follows:

- An average of 20 hours allocated for the strategic review and support of an annual update of the biennial review and consultation plan and schedule. These hours are specifically to support a clear rationale for the development of themes and topics, as well as the core aspects to be reviewed. Furthermore, support to independently review an Industry Review and Consultation Plan has been factored into this allocation.
- An average of 190 hours allocated to each of four expedited consultations on an annual basis. The hourly allocation has been estimated at 20% of the total hours accounted for during the most recent expedited consultation on the amendments to the SSG that came into effect on 1 November 2025. The percentage estimate of hours is consistent with NTESMO's account of professional support across several related engagements through activity-based costing. It has been assumed that owing to the resolution of TEM reforms and the integration of renewable resources that all reviews during the FY2028–32 regulatory period would take the form of expedited consultations and not more onerous, standard consultations. It was reasoned that if a standard consultation were commissioned during the period that the number of reviews and industry consultations would be rationalised to the capacity for the industry to accommodate these – namely if a standard consultation were expedited, the number of expedited consultations would halve for that period leaving the cost implications no different.
- An average of 110 hours allocated for minor consultations that complement the more significant expedited consultations and strategic support regarding the review of codes expedited by the Utilities Commission and Government during periodic review of the rules. This allocation also accounts for any miscellaneous activities procured for code, procedure and guideline review purposes.

Appendix A. Codes, procedures and guidelines

Table 7 – Current NTESMO codes, procedures and guidelines

Technical Document Title	Theme	Version	Date Effective	Review Period
BESS Operating Guidelines for System Operation	New Systems / Facilities	Draft	Not yet released	5-yearly
Dispatch and Pricing Procedure (I-NTEM)	Scheduling and Dispatch	Draft	Not yet released	TBC
Generator Forecast Compliance Procedure	Scheduling and Dispatch	1.1	July 2020	Subject to NTC and SCTC changes
Generator Offer Procedure	Scheduling and Dispatch	2.0	September 2020	Subject to SCTC changes
Generator Unit Tie Break Procedure	Scheduling and Dispatch	2.0	September 2020	Subject to SCTC changes
System Control Plant Outage Procedure	Scheduling and Dispatch	1.0	October 2020	Subject to SCTC changes
Indigenous Essential Services Deemed Load Profile Procedure	Market Settlement	1.0	April 2015	N/A
Settlements Statements and Timetable Procedure	Market Settlement	1.0	April 2015	Subject to SCTC changes
Metering Data Substitution and Estimation Procedure	Market Settlement	1.0	June 2018	Subject to SCTC changes
NMI Allocation Procedure	Market Operations	1.2	February 2017	3-yearly
Power System Incident Reporting Guideline	Power System Control	1.0	November 2023	N/A
Secure System Guidelines	Power System Control	5	November 2025	5-yearly
System Control Technical Code	Power System Control and Market Operations	7.0	February 2024	5-yearly
CATS Procedure Principles and Obligations - NETSMO MSATS Procedure*	Communications	1.2	September 2024	Reviewed to AEMO's NEM schedules
Customer and Site Details Notification	Communications	1.2	September 2024	Reviewed to AEMO's

Technical Document Title	Theme	Version	Date Effective	Review Period
Process - NTESMO B2B Procedure*				NEM schedules
Meter Data File Format NEM12 NEM13 - NTESMO B2B Procedure*	Communications	1.1	September 2024	Reviewed to AEMO's NEM schedules
Meter Data Process - NTESMO B2B Procedure*	Communications	1.2	September 2024	Reviewed to AEMO's NEM schedules
NTESMO Business to Business Guide*	Communications	1.2	September 2024	Reviewed to AEMO's NEM schedules
NTESMO Communication Guideline*	Communications	1.4	January 2025	Reviewed to AEMO's NEM schedules
NTESMO Standing data for MSATS*	Communications	1.2	September 2024	Reviewed to AEMO's NEM schedules
One Way Notification Process - NTESMO B2B Procedure*	Communications	1.1	September 2024	Reviewed to AEMO's NEM schedules or 5-yearly
NTESMO B2B Procedure - Technical Delivery Specifications*	Communications	1.1	September 2024	Reviewed to AEMO's NEM schedules

* Not included in the professional fees estimate for this business case as it is subject to a separate business case.

Appendix B. Cost estimation

Core cost elements were derived as follows:

Table 8 - Vendor hourly schedule of rates - RFT0309 2025

Vendor De-identified*	Description	Order Unit	Line Cost	Day rate
A	RFT0309 (Item 3) Principal Consultant	HOURS	\$270.00	\$2,160
B	RFT0309 (Item 4) Senior Consultant	HOURS	\$265.00	\$2,120
C	RFT0309 (Item 1) Director/Partner	HOURS	\$461.25	\$3,690
D	RFT0309 (Item 3) Principal Consultant	HOURS	\$337.50	\$2,700
E	RFT0309 (Item 3) Principal Consultant	HOURS	\$350.00	\$2,800
F	RFT0309 (Item 1) Director/Partner	HOURS	\$337.50	\$2,700
Unit Rate Average:			\$336.88	\$2,695

* Vendors have been deliberately de-identified as the tendered schedule of rates are commercial in confidence

The unit rate average for a principal consultant (or equivalent) was selected because the nature of work requires a seasoned industry specialist with substantial experience. The NTESMO professional services panel that was established in 2025, RFT0309 was used as a benchmark to derive the average unit rate average cost per hour.

The line-item breakdown of hourly allocation and associated costs is presented in Table 9 and provides a detailed breakdown of the costs for professional services associated to guideline and procedural reviews.

Table 9 - Annualised cost breakdown - code, procedure, guideline review

Line Item	Order Unit	Unit Rate Average	No	Total
Annualised update of biennial review plan	HOURS	\$336.88	20	\$6,738
Expedited Consultation 1 - Power System Controller Averaged input to procedural / guideline consultation @ 20% allocation of hours - SSG Version 5 review = 950 hours - 190 hours.	HOURS	\$336.88	190	\$64,006
Expedited Consultation 2 - Power System Controller Averaged input to procedural / guideline consultation @ 20% allocation of hours - SSG Version 5 review = 950 hours - 190 hours.	HOURS	\$336.88	190	\$64,006
Expedited Consultation 1 - Market Operations Averaged input to procedural / guideline consultation @ 20% allocation of hours - SSG Version 5 review = 950 hours - 190 hours.	HOURS	\$ 336.88	190	\$ 64,006
Expedited Consultation 2 - Market Operations Averaged input to procedural / guideline consultation @ 20% allocation of hours - SSG Version 5 review = 950 hours - 190 hours.	HOURS	\$ 336.88	190	\$64,006
Minor procedural consultations and Code Review - Strategic inputs	HOURS	\$ 336.88	110	\$37,056
Total	HOURS	\$ 336.88	890	\$299,818

Appendix C. Assumptions

The following assumptions have been accounted for in the assembly of this case:

- No more than 20% of the total time accounted for regarding expedited consultations has been allocated for professional expertise.
- The basis of cost estimate is derived from averaging the tendered rates from the NTESMO Professional Services Panel RFT0309 2025. The actual costs may vary dependent upon the professional service provider/s procured at the time of each review.
- There will be no more than two Market Operations and two Power System Control procedural and guideline reviews on an annual basis. Each of these reviews will follow the well-established seasonal schedule for industry consultation. The precise nature of each of the reviews across the regulatory period is not known at present, however, the estimate has been based upon the frequency and duration of reviews conducted during FY25 and FY26 (2025).
- The fixed establishment of NTESMO personnel will remain fixed for the purpose of meeting NTESMO's regulatory obligations to review codes, guidelines and procedures.
- The regulatory business case is dependent upon the outcome of the TEM reforms design and implementation – following implementation of the reforms the precise impact upon the review of codes, procedures and guidelines will be known and this case will require review and revision to meet whatever additional obligations are prescribed from the reforms.
- NTESMO no longer has an obligation to directly facilitate the review of codes and rules – this accountability has been re-assigned to Government (DME) and the Utilities Commission. Should this policy position change or the performance of the function be delegated to NTESMO, the step-change revenue implications would require re-assessment.
- NTESMO remains accountable for the facilitation of review and amendment of all Power System Controller and Market Operator procedures and guidelines that are prescribed within the System Control Technical Code (SCTC). Should the review and amendment of the SCTC or establishment of the TEM rules require additional procedural and guideline development, the costs associated with periodic review will require review and revision. At the writing of this case, it was unclear as to the extent of changes to the nature and type of guidelines and procedures and it was assumed that there were no further guidelines or procedures to be developed and published.
- The costs derived in this business case are net of any legal costs. Legal costs arising from such reviews are to be funded through corporate cost allocation or Northern Territory Government prior to separation of NTESMO and through corporate overhead allocation after NTESMO separation from Power and Water Corporation.
- Should the existing commercial and contractual terms and conditions related to the engagement of professional services providers change from the current NTESMO Professional Services Panel RFT0309, that is valid only for a period of 24 months, the cost estimate would require revision. The estimate is in FY25 real dollars and does not account for any unforeseen escalation of cost, notwithstanding standard escalation factors.
- The development of the case contained within this paper is to give effect to existing regulatory obligations. It is of an operational expenditure nature and no material assets are to be created from the case.

- The benefits and detriments of the options analysed in the case are determined from a qualitative risk assessment only. NTESMO did not undertake a detailed risk analysis because the preferred option represents the minimum viable actions required to meet a regulatory obligation that has legal effect. The failure of which will result in a breach of licence, associated penalties and significant reputational damage to NTESMO as an entity both within Power and Water and in the future, as a statutory entity following the implementation of legislative amendments.

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