

**27 October 2020**

Utilities Commission of the Northern Territory

By email: [utilities.commission@nt.gov.au](mailto:utilities.commission@nt.gov.au)

Dear Utilities Commission,

## **ELECTRICITY INDUSTRY PERFORMANCE CODE (STANDARDS OF SERVICE AND GUARANTEED SERVICE LEVELS) REVIEW**

I write in response to the call for submissions to the *ELECTRICITY INDUSTRY PERFORMANCE CODE (STANDARDS OF SERVICE AND GUARANTEED SERVICE LEVELS) REVIEW* issues paper, emailed to Epuron on 16<sup>th</sup> September 2020 by the Utilities Commission of the Northern Territory.

Epuron is the owner and operator of the 4MW Uterne solar power plant at Alice Springs, the 1.8MW solar power plant at Yulara and also the three integrated high penetration solar power stations at Ti Tree, Kalkarindji and Alpururulam (Lake Nash), known as TKLN Solar which total 1MW. Epuron also developed the 25MW Katherine solar power plant, which has recently been sold to ENI Australia Ltd and is now under construction. Epuron is one of only two Independent Power Producer (IPP) entities on the regulated NT networks.

The Utilities Commission is reviewing the Electricity Industry Performance Code (Standards of Service and Guaranteed Service Level) (EIP Code) to address a number of known issues and to ensure its content and operation is of continued relevance and effectiveness for the electricity supply industry in the Northern Territory.

Epuron appreciates the opportunity to provide a submission to the Utilities Commission EIP Code review issues paper. Epuron has chosen to respond only to the Utilities Commission stated question relevant to its position as an IPP. This is shown below.

### **Question 3**

Should IPP licensees be excluded from the definition of 'generation services', and why?

Epuron argues that IPP licensees **should** continue to be excluded from the definition of generation services. There are only two IPP licensees on the regulated NT networks and they have a very limited impact on the reliability and provision of electrical energy to customers. Reporting to the Utilities Commission under the EIP Code would require significant extra overhead without providing the Utilities Commission with any new useful information.

Uterne provides energy under a PPA with Territory Generation but has no visibility about the number of customers supplied. Uterne also does not provide essential system services (previously known as ancillary services) and so Uterne's ability to be accountable for the number of customers supplied is limited. Uterne's performance is managed by adherence to the System Control Technical Code.

We look forward to engaging further with the Utilities Commission in the future and the exciting renewable technology opportunities in the Northern Territory.

Please do not hesitate to contact us if we can usefully provide any further information.

Yours sincerely,



**MARTIN POOLE**  
**EXECUTIVE DIRECTOR**  
**EPURON**