

Review of the Northern Territory Electricity Industry Performance Code



Power and Water Submission
D2020/527301



Introduction

Power and Water Corporation (Power and Water) welcomes the opportunity to respond to the Utilities Commission of the Northern Territory (Commission) Issues Paper on the review of the Electricity Industry Performance Code (Standards of Service and Guaranteed Service Level) (EIP Code).

We provide a range of essential services, including some services that are outside of the regulated network and advocated for a Code that is tailored to the unique structure of the Northern Territory industry, and which best meets the long-term interests of electricity customers. Power and Water strongly supports the Commission's pragmatic approach to address the issues with the EIP Code and in ensuring its content and operation is of continued relevance and effectiveness for the electricity supply industry in the Northern Territory.

Responses to the Issues Paper questions

Question 1: *Are there any administrative related errors that should be considered by the Commission as part of the review?*

- The use of the term 'Interruption', and variations of, throughout the body of the document is inconsistent and has led to customer confusion around eligibility of certain outages. 'Network Interruption', 'Unplanned Network Interruption' and 'Planned Network Interruptions' have specific definitions, 'Interruption' does not. The way eligibility criteria is described in the body of the document does not align well with the definitions.
- In Table 1 Performance Indicators, the clause for re-connection should be updated. It is recommended to align the timeframe for this indicator to be consistent with other related indicators, as Power and Water don't offer reconnections on a weekend or public holidays. Suggested wording change is provided below:
 - Remove '~~24 hours~~' and replace with '1 business day': Re-connection of an existing premises – within 1 business day of receipt by the network entity of a valid request for re-connection from the small customer.

Question 2: *Does the EIP Code require additional clarification to make it clear that it is only applicable to electricity entities providing the relevant services in the Darwin-Katherine, Alice Springs and Tennant Creek power systems?*

- Power and Water would support further clarification within the Code to specifically identify these power systems as the 'regulated network'.
- Confusion exists with stakeholders about its application given that network, retail and generation service licences exist for entities and networks outside of the 3 main power systems of Darwin-Katherine, Alice Springs and Tennant Creek. This could be clarified in Section 1.4 *Application*, as well as in the definition for 'Regulated Network', for example this could be achieved by making reference to the 'power system' definition.

Question 3: *Should IPP licensees be excluded from the definition of 'generation services', and why?*

- IPPs are excluded from the definition of generation services and therefore not required to report no later than 31 August against clause 5.1.1 of the EIP Code for the previous financial year.
- Clause 5.2.1 of the EIP Code refers to Schedule 2 of the Code. S2.2.4 requires a generation entity to calculate the performance indicators separated into sections as per S2.2.3:
 - generation service performance indicators in Table 1 that relate to a power station (including SAIDI/SAIFI indicators related to generation interruption);
 - Generation unit availability; and
 - Generation services reliability performance indicators.



- Licences: Summarising, the Commission may impose conditions on a licence per the Electricity Reform Act 2000 (Part 3, Div 1, 25) for generation of electricity:
 - Compliance with directions of the power system controller;
 - Electricity quality fit for the electricity network to which it is connected;
 - Prevent the generator from doing anything to prejudice public safety or security of supply.
- Authority conferred by a licence for generation of electricity is to:
 - Generate electricity for sale;
 - Sell electricity ;
 - Develop, build, operate, maintain generation plant;
 - Access the network via an access agreement.
- An example of a special licence (Independent Power Producer) granted in NT was to (summarised):
 - Generate electricity for own use and for sale;
 - Sell electricity to electricity entities holding a generator licence;
 - Sell electricity to a person (in this case a mining company);
 - per the terms of the licence.
- The output availabilities of large scale renewable based IPPs are likely to be much more variable (even with complementary battery storage) than conventional generator sources, dispatchability decreases, and the risk of net reduction of power system security and reliability increases.
- As IPP licences that may be granted to renewables (solar) could be an IPP license there is no requirement for a licensee to report against the EIP Code. On the basis of these considerations it seems appropriate that IPP licensees should not be excluded from the definition of generation services, and should therefore be required to report as required by clause 5.1.1 of the code.
- As long as IPPs are compliant with the technical codes and GPS requirements then it should be fine. Power and Water's main concern is system security and performance standards. Previously, the historical small IPPs (<1MW) did not have any impact on the system as it was on at the majority of the time with a good reliability record and stable output of 0.8 to 1 MW. Now with the IPPs increasing and the likelihood of these connection to be inverter based and much more variable and larger in size, then it is necessary for these connections to go through the connection process and comply with the codes according to the size and impact of these connections.
- The obligation on IPPs to report on performance should be commensurate with the size of their generation plant in comparison to the system load range. So small IPPs at < 1MW probably does not warrant a high level of reporting obligations, whereas larger IPPs for example Uterne at 4MW on Alice Springs network is material and should be subject to a higher level of obligations.

Question 4: *Should the EIP Code include a clause to review GSLs and GSL payment amounts prior to the beginning of each regulatory control period?*

- Forecasting of GSL payments is important for Power and Water's submissions to the Australian Energy Regulator (AER) for regulatory determinations. Providing greater certainty on the structure and magnitude of GSL payments for each regulatory period in full enables more efficient and accurate forecasting.
- Scheduling of the review should consider the timing of the submissions to the AER. This would likely result in a review timeframe of 2 years prior to the commencement of each new period.
- The next AER regulatory period is 2024-2029 and preparation for our submission to the AER will commence in 2021-2022. To align the review of GSL payments to the AER submission timeline, the review should commence in 2022.



Question 5: *Should the EIP Code include the entire, or elements of, the Audit Guidelines into an updated EIP Code, and why?*

- Power and Water agrees that the inclusion of parts of the EIP Code Independent Compliance Audit Guidelines (Audit guidelines) would further assist electricity entities in meeting their EIP Code clause 6.2 obligations.
- However Power and Water has concerns with regard to the reference to clause 3.65 of the Compliance Framework and Reporting Guidelines (CFR Guidelines) and the potential for Power and Water to not meet this obligation should the Commission be inflexible on its application as we use all of the Tier 1 auditors across our business in varying degrees.
 - 3.65 CFR Guidelines “An auditor engaged for a particular audit should be independent of the regulated entity. In particular, an auditor must not have any direct or indirect commercial interest in ~~or obligation to~~ the entity which is being audited. An auditor must conduct an audit independently and objectively.”
 - Given clause 4.1.5 Audit guidelines provides the Commission with powers to appoint an auditor of its choosing should the Commission find a proposal not suitable, we strongly encourage the Commission to consider removal of ‘or obligation to’ allowing auditors with appropriate technical expertise to hold an unrelated/indirect contract.
 - Finding an auditor with appropriate technical expertise that has not done work or is not engaged in some aspect of the business, not just auditing, is extremely difficult. Power and Water’s view is that given Professional obligations and Accounting Regulations, the ability to erect the appropriate walls should be available. Power and Water would be happy to support those walls without impact on the provider.

Question 6: *Is it reasonable that planned maintenance be excluded from duration and frequency based GSLs, and why?*

- Power and Water’s view is that it is reasonable to exclude planned maintenance from duration and frequency based GSLs due to a number of reasons:
 - The intent of the GSL scheme is to encourage entities to invest in the improvement of reliability for poorly served customers. Planned maintenance is conducted in all areas of the network, regardless of levels of service and for a variety of factors other than reliability, such as public safety and augmentation for growth or new connections.
 - Including planned maintenance may provide a disincentive to entities to perform maintenance or defer maintenance in areas that are near to exceeding GSL thresholds. There would also be an incentive to shorten the duration of planned outages, reducing the efficiency of delivering maintenance services and increasing cost to customers for the same level of reliability.
 - Add complexity to reporting by applying different exclusions to general network reliability performance indicators, GSL and for Regulatory Information Notices issued by the AER. Power and Water’s outage system is not capable of recording the level of detail required to accurately record all planned outages and accurately identify customers in all outage and network switching scenarios.
- Defining the types of planned outages to be counted is also complex, often short planned outages are required to disconnect and reconnect customers to alternative sources of supply. Would this be considered a single outage or two outages? This could lead to a significant increase in customers eligible for GSL who otherwise experience good reliability as a result of several short maintenance outages in a year.



Question 7: *Other than in relation to planned maintenance (as covered in the above question), are the current clause 7.2.3 exclusions in the EIP Code appropriate and adequately defined for all obligations under the EIP Code, and why?*

- It is Power and Water's view that the definitions of excluded outages should be aligned with the AER's Service Target Performance Incentive Scheme (STPIS) Version 2.0. The current approach of having unique definitions has a number of consequences including:
 - Prevents simple comparisons to other network service providers by both Power and Water and external parties;
 - Creates additional complexity in Power and Water's reporting systems. While the AER's requirements are more complex than the current Code requirements, Power and Water must meet the AER requirements for the Annual Regulatory Information Notice (RIN).
 - Prevents the Commission from utilising available benchmarking analysis performed by the AER or other stakeholder groups to compare performance across the National Electricity Market.
- Furthermore, in relation to exclusion (f), the limitation of this exclusion to 'Natural Events' only can result in other significant events 'masking' underlying reliability trends for the network.
 - The AER STPIS guide definition applies to not only individual events, but to all events that occurred on the relevant day or day(s) where daily SAIDI breaches the statistical threshold defined by the '2.5 beta method'. This recognises that when these significant events occur, the impact on network reliability on the wider network is also not statistically relevant due to the consequential impact of such extraordinary events. This includes when Power and Water's ability to respond to other minor events on the network during the event may be limited for a variety of reasons, such as resource constraints for network operations or response, or consequential power system constraints.
 - It is also noted that in setting the performance targets for the current regulatory period, Power and Water and the Commission agreed to use the historical five year average with the 2014/15 system black event removed. This resulted in a more realistic, and onerous, reliability target that reflected underlying reliability performance. While new targets are not required to be based on historical averages, in Power and Water's view it is the best methodology and illustrates the philosophy why excluding major events from adjusted reliability performance indicators provides the most prudent outcome for customers.
- Power and Water recommends additional guidance be added to exclusions (a) to provide clarity on its application to loss of renewable generation. Increasing rooftop behind the meter solar is changing the nature of loads on the distribution systems and transmission rings, creating scenarios where the loss of a feeder(s) or weather events under normal circumstances can now result in a significant reduction of net generation in peak solar periods. This is more likely to be an issue in the smaller systems of Alice Springs and Tennant Creek.

Question 8: *If the current clause 7.2.3 exclusions in the EIP Code are not appropriate and adequately defined in relation to the matters in the previous question, how should the exclusions be changed?*

- Increasing rooftop behind the meter solar is changing the nature of loads on the distribution systems and transmission rings (sub transmission in a past era). Therefore UFLS as a last system level defence against loss of generation on the grid may become less effective during day time minimum loads as feeder loads and transmission ring loads reduce and flows potentially reverse direction. In reverse flow situations the tripping of a feeder could make the problem of loss of generation worse by reducing net generation. This suggests that exclusions of events (a), (b) and (c) may be inappropriate. This suggests that exclusions of events (a) "load shedding due to a generation shortfall", (b) "automatic load shedding due to the operation of under-frequency relays following the occurrence of a power system under-frequency condition" and (c) "load shedding at the direction of the system controller" may be inappropriate. Some clarification on the intent of exclusion (d) "load interruptions caused by the exercise of any obligation, right or discretion



imposed upon or provided for under jurisdictional electricity legislation or national electricity legislation applying to a network entity” is required to ensure it is adequately defined.

- It is Power and Water’s view that if the AER STPIS definitions are not adopted, it is recommended that:
 - Exclusion (b) be updated to remove the specific reference to ‘under-frequency relays’ and ‘under-frequency condition’ and replace with ‘generator protection systems’ and ‘abnormal condition’.
 - Exclusion (f) be updated to include non-natural events, and for the exclusion to be applied for all events on the day on which the event occurs.

Question 9: *Is the current EIP Code definition of ‘interruption’ appropriate in relation to GSLs and GSL payments, and is there a possibility all interruptions could be excluded from GSL payments, should the terms and conditions of the contract for supply include all types of interruption, and why?*

- Power and Water’s view is that the definition and supporting clauses provide a clear definition of an ‘interruption’ for the purposes of GSL, noting that Power and Water does not consider ‘Planned Network Interruptions’ as eligible outages for GSL.
- As described in Power and Water’s response to question 1, the definitions and use of terms for various types of ‘Interruption’ are recommended to be reviewed and made more consistent.
- Power and Water complies with relevant consumer law in the management of contracts for supply of electricity. This requires contract terms and conditions to be fair, equitable, and align with jurisdictional codes, legislation and good industry practice.
- Power and Water does not negotiate these terms and conditions for residential and small business customers. If scenarios emerge that necessitate specific operational conditions for the safety or security of the wider network, then this is unlikely to be for customers that meet the eligibility criteria. The standard terms and conditions for the contract to supply is publically available to the Commission for review to ensure it aligns with the intent of the Code.

Question 10: *If the current EIP Code definition of ‘interruption’ is not appropriate in relation to GSLs and GSL payments, how could it be improved?*

- Power and Water’s view is that clause 7.2.3 be updated to include ‘Planned Network Interruptions’ as proposed in Power and Water’s response to Question 6, as well as the amendments proposed in Power and Water’s response to Question 7.

Question 11: *Are the current Schedule 2 generation services performance indicators appropriate for current and future generators, including renewable energy and batteries, and why?*

- Generation connections to the regulated systems are increasingly inverter based. A review of the performance indicators and their sections per S2.2.3 may be required for the performance indicators to be relevant to these generation sources.
- Examples of the types of potential issues with the current performance indicators are:
 - A power station may not be a generation unit based entity going forward;
 - Solar panels, even if grouped under larger inverters, are likely to be in smaller increments of maximum capacity than conventional thermal generation units.
 - Solar generation available capacity has an underlying pattern of rapid increase in output once the sun rises, the rate of increase decreasing towards maximum output at the highest daily point of the sun, then decreasing at an increasing rate towards zero output when the sun sets.
 - Solar generation available capacity may also fluctuate randomly due to changes in solar insolation caused by atmospheric conditions such as clouds, rainfall, dust, and smoke. The daily variability of available capacity may require different (or additional) metrics for performance indicators from those in Schedule 2 (e.g. unit derating, equivalent partial outage hours, availability factor, unplanned and equivalent availability factor, forced



outage factor, equivalent forced outage factor). Due to the impact of solar on the daily system demand curves (as seen by conventional generation fleet) the value of available capacity reduces as the daytime demand decreases at the middle of the day. Time of day varying performance indicators may be needed to replace or complement the annual factors currently used. This need comes about as the so called 'duck belly' system demand curve emerging from high penetrations of solar that reduces the daytime minimum demand. This becomes critical when the system daytime demand reaches values around the minimum stable load of the generators remaining online for system security reasons. While this is a daytime issue, the overall capacity requirements are still relevant to meet the whole of day peak demand in the evening after solar generation approaches zero.

- Similarly a set of performance indicators for batteries may need to consider the storage capacity discharging available generation capacity and charging available load characteristics on a daily timeframe rather than annual measures.
- Availability of the inverter units of PV plant is a valid and important indicator of performance (refer to IEEE standards and by way of example the Performance Reports for the SETuP program), but only for the sunlight hours period (energy source availability) which is a seasonally varying window of time.
- While the fuel source is variable second to second, there is nevertheless an amount of natural resource that can be planned for annually and incorporated into fuel quantity planning from other sources. A reduction in solar availability will therefore have an increasingly significant impact on the planned availability of other sources. It is therefore valid to measure and track solar availability.
- The performance indicators envisaged for solar and solar + BESS combinations should incorporate specific metrics for measuring their capability to both meet active power dispatch at the required accuracy under Network Technical Code (NTC) 3.3.5.14 and meet their 30-minute-ahead forecast accuracy requirements under NTC 3.3.5.17, this being the fundamental tools we have put in place for our regulated networks to address the variability discussed in Question 11. That having been done in lieu of imposing the requirement on other generators (TGen) to provide the high level of regulating reserve required to compensate for their otherwise unanticipated rapid fluctuations in energy source availability (and thus in the output of uncompensated PV).

Question 12: *If the current Schedule 2 generation services performance indicators are not appropriate for current and future generators, including renewable energy and batteries, what indicators should the Commission consider, and why?*

See response to question 11.

Question 13: *Does the Commission's direction issued on 20 November 2018 adequately address the identified issues, and why?*

See response to question 11.

Question 14: *Should generators be required to report to the Commission in relation to performance and condition monitoring, and why?*

- Power and Water's view is that generators should be required to report to the Commission in relation to performance and condition monitoring as it will allow a comparison to the information provided to System Control.

Question 15: *Should it be decided generators are required to report to the Commission in relation to performance and condition monitoring, what is an appropriate level of reporting, and why?*

- Generators in the NT are of various sizes and types and as a result, we believe that the level of reporting in relation to generation performance and condition monitoring should vary dependent on the scale/size and type of generator.
- The key consideration is that each generator (including renewable energy) should report on its overall generation availability, and available generation capacity as a minimum on an annual basis



but also by time of day and or seasonally for non-firm renewable generators. Other considerations include forced outage rates and performance in relation to generator's contractual/dispatch obligations.

- Whilst condition monitoring is not a key concern of Power and Water as the system operator, we would consider it beneficial to gain insights from understanding what the generators' long term maintenance plans are.

Question 16: *Should network entities be required to report on the worst performing feeders, and why?*

- Power and Water supports the reporting of worst performing feeders or an alternative approach requiring the reporting of performance for the poorest served customers.
- Power and Water notes that there are currently only three feeders in the Rural Long category. As a result, all feeders are reported each year as 'worst performing feeders', regardless of performance. This is misleading for readers that do not have a good understanding of the Code. This could be addressed through amending the requirement to report only the 'Top 5' worst performing feeders that have *also* exceeded the relevant category target.

Question 17: *If network entities are required to report on the worst performing feeders, should a threshold for identifying problematic performance of individual feeders be used rather than the five worst feeders in each category, and why?*

- Power and Water supports the simple reporting process that the current version of the Code requires.
- Power and Water notes that the AER has in the 2019/20 Regulatory Information Notice, introduced a new schedule for "Inadequately Served Customers". This applies a threshold for poorly served customers that is four (4) times the 3 year average of overall system performance, that is "Whole of Northern Territory" SAIDI performance. The calculation applies at the customer level, and therefore identifies segments of poorly served customers on otherwise good performing feeders. This is more aligned with the intent of GSL reporting and the information is available through Power and Water's RIN response published by the AER.
- Prior to considering any change, it is recommended that the Commission review the latest requirements of the AER's STPIIS and Regulatory Information Notices to determine if existing reporting requirements and measures are adequate to monitor Power and Water's performance in the regulated network. This would ensure the most efficient outcome for Power and Water and customers. Considerable investment and operational costs are incurred when changes are made that require alternative or additional reporting measures that must also be separately audited.

Question 18: *Should feeder performance be determined on SAIFI performance as well as SAIDI performance, and if so, how should this be done and why?*

- Power and Water agrees that consideration should be given to including SAIFI, but the desired outcome from the addition of SAIFI reporting requires further consultation. There is generally a high degree of cross-over between the SAIDI and SAIFI performance of feeders that are poorly performing. Actions to improve SAIDI performance result in improvements to SAIFI.

Question 19: *Should Schedule 4 of the EIP Code include AER retail services performance indicators, where possible, or should all retail services performance indicators be Territory specific, and why?*

- Power and Water supports alignment with the AER retail performance indicators required in the annual Regulatory Information Notice to ensure reporting is efficient and consistent.



Question 20: *If Schedule 4 of the EIP Code includes AER retail services performance indicators, is it appropriate to simply reference the AER Guidelines or should these performance indicators be explicitly included in the EIP Code?*

- Consideration should be given to the areas of retail performance that require improvement (if any) or Territory specific issues that require performance indicators. Power and Water is not currently aware of any specific areas of retail performance that are of concern to the Commission that would require additional measures.

Question 21: *If Schedule 4 of the EIP Code includes AER retail services performance indicators, are additional definitions, interpretation or clarifications required to improve the operation of the EIP Code (other than the ones discussed in this section of the Issues Paper)?*

- Power and Water supports referencing directly the AER's Guidelines and definitions. Power and Water must comply with any changes to the AER's Guidelines, and therefore referencing the AER's guidelines eliminates the possibility of reporting requirements becoming out of step during the period.

Question 22: *If Schedule 4 of the EIP Code includes AER retail services performance indicators, should the date from which debt is calculated and the term 'debt' be defined in the EIP Code, and why?*

- Power and Water does not have a view on this matter.

Question 23: *If it is decided that the term 'debt' should be defined in the EIP Code, is it appropriate to define 'debt' as 'the amount owed to a retailer from the bill due date, regardless of how long it has been outstanding', and why?*

- Power and Water does not have a view on this matter.

Question 24: *If Schedule 4 of the EIP Code includes AER retail services performance indicators, are the current complaint categories adequate to capture sufficient detail regarding complaints, and why?*

- Power and Water does not have a view on this matter.

Question 25: *If the current complaint categories are not adequate to capture sufficient detail regarding complaints, what complaint categories should be used and what should they include?*

- Power and Water does not have major concerns with the current complaints categories, however Power and Water suggests that consideration should be given to incorporating categories relating to Solar PV and metering.

Question 26: *Should the EIP Code include the AER's 'smart meter' complaint category, and why?*

- Power and Water supports the introduction of this complaint category.
- Power and Water does not break down complaints to metering type but the category of complaints is broken down by some of the 'sub types': complaints regarding installation, installation delay, cost, data, privacy and de-energisation.
- Power and Water has not seen any trending to date in these complaint categories related specifically to smart meters that warranted this level of reporting. The introduction of this complaint category could provide valuable insights for network service providers as the penetration of smart meters increases.

Question 27: *Is the current definition of 'residential customer' and 'small customer' in the EIP Code sufficient, and or does a definition of 'small business customer' need to be added, and why?*

- Power and Water's view is that the definition is adequate, but would support changes to make it clearer. Consideration should be given to maintaining alignment with AER definitions.



Question 28: *Should the EIP Code explicitly define the meter types to be reported as part of Schedule 4, and why?*

- Power and Water agrees that the Code should define meter types to be reported, however consideration should be given to the intent of this reporting and define types at the appropriate level and align with industry definitions. This will ensure consistency between different service providers and network operators for sharing of this type of information across different systems.

Question 29: *Should the requirement to report customers by meter type continue to be a retail services performance indicator or should it be a network services performance indicator, and why?*

- Power and Water's view is that this should remain a retail services performance indicator as existing indicators for network services are focused on understanding network performance. Meter types do not provide additional value in understanding this performance

Question 30: *Should Schedule 4 of the EIP Code in relation to customer service performance be expanded to capture more than telephone responsiveness, and if so what additional performance indicators could be included?*

- Limiting performance indicators to telephone responsiveness does not reflect the changing nature of customer interactions, performance measures such as web based interactions should be considered.
- The first Indicator in Table 4 could be rewritten to "Total Number of contacts to Customer Service Centre / Credit and Collections" broken down to following categories (for example):
 - Inbound phone calls
 - Live chats
 - Email enquiries
 - Call backs
 - Social Media (Facebook, twitter etc.)
 - Website forms
 - Customer portal (if they have one)

This will depend on the retailers' system capability and own internal measurements for response times against each query type. The current measurement is based purely on inbound phone calls, and not all other methods customers can make contact with their retailer.

The category could be taken further with a breakdown of the 'wrap up' codes used as per the complaints indicators for each of the first three indicators in Schedule 4, however availability of that data from the retailer systems may be a constraint.

Question 31: *Is it appropriate for electricity entities providing retail services to report on the number of customers segmented by region, customer type and consumption level, as part of Schedule 4 of the EIP Code, and why?*

- Power and Water has access to this information and has no concern in relation to the reporting on the number of customers segmented by region, customer type and consumption level by electricity entities providing retail services.

Question 32: *Should the EIP Code define a 'customer' for the purpose of reporting against Schedule 4 as a 'National Meter Identifier (NMI) connection point', and why?*

- Power and Water supports the proposed change in definition, and recommends consideration be given to whether reporting of active and inactive customers (NMI's) provides value in understanding the trends associated with customers in the NT.



Question 33: *Should the EIP Code define the Darwin and Katherine regions for reporting segmentation purposes, and is the definition provided by the Commission appropriate, and why?*

- While Power and Water aligns with the principle described for segregation of regions, further clarification in the EIP Code is supported.
- Power and Water's view is that there is a logical separation of distribution networks between Darwin and Katherine that exists in the area between Pine Creek (including the associated 66kV feeder from Pine Creek Zone to Cosmo Howley Zone Substations) and Adelaide River Township.
- Adelaide River is supplied via the Darwin distribution network via Batchelor and Manton Zone Substations. Adelaide River cannot be supplied via the Katherine distribution network.

Additional stakeholder issues

As part of the scope of the EIP Code review, the Commission welcomes additional stakeholder feedback in relation to issues not already identified in this Issues Paper, and will consider and address additional issues raised by stakeholders during consultation, where appropriate, and with the assistance of a technical expert as required.

- Power and Water notes that there may be areas related to Generation and Retail services that can have a consequential impact on Power and Water. This may be related to instances where Power and Water provides information to other entities, such as meter data or outage records.
- To ensure the best outcome for all entities Power and Water encourages further consultation with the Commission and their appointed technical experts on all changes proposed, not just those proposed by Power and Water.