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11 October 2024

Mr Lyndon Rowe
Utilities Commissioner
Utilities Commission of the Northern Territory
Level 3, NT House
22 Mitchell Street
Darwin NT 0800

By email: utilities.commission@nt.gov.au

Dear Lyndon,

Utilities Commission – 2024 Electricity Industry Performance Code Review Consultation Paper

We refer to the Utilities Commission of the Northern Territory email dated 11 September 2024 inviting Assure Energy to provide written feedback regarding the 2024 Electricity Industry Performance Code Review – Consultation Paper.

Assure Energy would like to thank the Utilities Commission of the Northern Territory for the opportunity to provide written feedback for this consultation and provide the following commentary to Questions 14 and 15.

Q14 Are the current generating unit availability-related performance indicators (AF, UAF, EAF, FOF, EFOF) suitable for all types of generation, including solar PV and batteries? Why or why not?

The current performance indicators as outlined in Northern Territory Electricity Industry Performance Code are not suitable for solar PV and batteries. In reviewing these formulas, it is apparent that they are used for traditional power stations that can generate 24 hours per day and can count their generation hours with certainty. A solar farms' availability is when irradiance occurs, which can vary depending upon the season and daily weather conditions. The requirement for the installation of batteries under the new GPS standards also can create a conflict of generating availability when the batteries are charging or discharging.

Q15 If the answer to question 14 is no, should the relevant licensees be excluded from generating unit availability reporting, or are there other more relevant performance indicators?

Assure Energy believes that generation from Solar Farms should be excluded from availability reporting. At this stage, Assure Energy is not aware if there are more relevant and/or proven performance indicators.

Yours sincerely,