



20 September 2023

Utilities Commission
GPO Box 915
Darwin NT 0801

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

Review of the Northern Territory's Electricity Supply Licensing Regime Consultation Paper – Standard Licence Conditions

Thank you for the extension of time afforded to EDL to review the consultation paper on standard licence conditions. To the questions therein, EDL provides the following responses:

1. Do stakeholders have feedback and comments on the proposed standard administrative conditions?

The changes are appropriate for the purpose of transparency and reinforcement of requirements.

2. Do the proposed conditions appropriately reflect and address the risks and accommodate the benefits of contracting out operations covered by a licence?

Yes.

3. Do the proposed changes improve transparency on requirements and apply reasonable timeframes for the provision of information?

Yes.

Is there other information the Commission should consider including in the conditions?

The Commission should clarify the notice required for item 2(a). For example, "change" may be interpreted as the execution of a contract with a new operating contractor (commencement may be months later), or the day a new operating contractor commences services.

4. Do the proposed conditions clearly and sufficiently set out the types of regulatory instruments that licensees must comply with?

Yes.

5. (a) Do the proposed changes improve transparency on requirements and apply reasonable timeframes for the provision of information on instances of non-compliance?

Yes, noting that the proposed changes also increase requirements for some licence holders. The higher baseline (notification of any breach) is consistent with other jurisdictions.

(b) Is there other information the Commission should require in relation to a material breach?

No.

6. Do stakeholders have any comments or feedback on existing licence conditions that are proposed to be excluded from the standard retail conditions or the existing licence conditions to be included in the standard retail conditions without change?

EDL is particularly supportive of the removal of duplication regarding a coordination agreement, being not currently active in the Territory's retail market and having external constraints on the coordination agreement progress.

7. (a) Would the proposed change to the timeframe for standards and procedures to be in place create any barriers to entry for new retailers?

No. Rather, requiring standards and procedures to be in place prior to commencement of operations *may* afford a licensee more time to ensure the best processes practicable are implemented while protecting customers' interests.

(b) Is the additional guidance on standards and procedures useful and is there other information that should also be included?

The additional guidance is useful, and EDL has no feedback on other information that should also be included.

8. Does the proposed approach appropriately balance the benefits and costs of providing customers with advance notice of changes?

Yes.

9. Do stakeholders have any comments or feedback on the exclusion of conditions relating to coordination agreements, SMMP and ancillary services?

EDL is supportive of all exclusions proposed for the reasons stated by the Commission.

10. Do stakeholders have any feedback or comments on the relevance or need to change the four proposed standard generation conditions relating to directions of the System Controller, quality of electricity, compatibility and right of use?



No.

11. Do stakeholders have any comments or feedback on the exclusion of conditions relating to coordination agreements, SMMP, dispute resolution procedures, provision of customer data and right to use?

No

12. Do stakeholders have any feedback or comments on the relevance or need to change the four proposed standard network conditions relating to compatibility, coordination, restrictions on trading and disconnections?

No.

13. Do stakeholders have any feedback or comments on the inclusion of the proposed sub-condition requiring compliance with the directions of the System Controller?

No.

14. Do stakeholders have any feedback or comments on the modification and inclusion of the proposed standard network licence condition on operation and maintenance?

No.

15. What improvements could be made to better present and structure information in electricity supply licences compared to that proposed?

EDL has no suggestions beyond what the Commission has already proposed.

Yours sincerely

A handwritten signature in blue ink that reads 'Neil Duffy'.

Neil Duffy
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EDL