

28 July 2017

Mr Justin Martyn
Utilities Commission of Northern Territory
GPO Box 915
Darwin NT 0801

Dear Justin

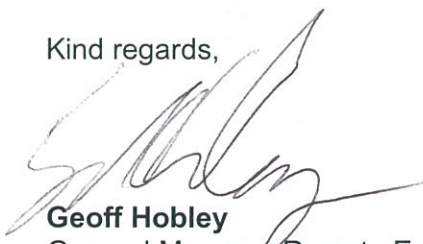
Review of Electricity Standards of Service and Guaranteed Service Standards Codes – Consultation Paper Submission

EDL has reviewed the Electricity Standards of Service (ESS) and Guaranteed Service Standards (GSL) Codes and makes the following comments:

- All of the reporting obligations required under the ESS appear to apply only to Retailers who are supplying small use customers (i.e. consuming less than 160MWh per annum). It should be made clear that the ESS only applies to Retailers who supply small use customers and that there are no obligations applying to Retailers who only supply to larger customers (i.e. above 160 MWh per annum).
- There is significant commonality between the ESS and GSL, however it is not essential that they be combined due to the differing application of each Code.
- Aligning definitions with national frameworks where possible would be helpful, particularly for personnel who work across multiple jurisdictions.
- The generator performance indicators warrants a review, including industry stakeholders as to whether these are appropriate for all generators. Specifically, SAIDI and SAIFI are more relevant to Network operation than to specific generators. Additionally, the indicators that are currently established may not be suitable for intermittent generation as this becomes more prevalent.

Should you have any questions or wish to discuss this submission further, please contact me on the details below.

Kind regards,



Geoff Hobley

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