



Ref. REN.LT.7757.UCNT.SR

25 October 2024

Utilities Commission of the Northern Territory  
Via email: utilities.commission@nt.gov.au

Dear Utilities Commission of the Northern Territory,

### **SUBMISSION ON THE 2024 ELECTRICITY INDUSTRY PERFORMANCE CODE REVIEW (VERSION 2)**

Eni Australia Limited (**EAL**) thanks the Utilities Commission (**UC**) for the opportunity to provide feedback relating to the UC review of Version 2 of the Electricity Industry performance Code (**EIP Code**).

I refer to your correspondence dated 10 September 2024 in relation to the subject matter. EAL offers the following responses to the questions raised in the UC review of the EIP code and, as instructed in your correspondence, has only responded to matters relevant to our expertise or interest.

<b>UC Question</b>	<b>EAL Response</b>
<p><u>Question 3</u> Should there be a broader exemption clause in the EIP Code to cover more than reporting obligations? Why or why not?</p>	<p>Yes. A broader exemption clause in the EIP Code to cover more than reporting obligations should be introduced as there could be legitimate reasons that prevent licensees from being able to meet certain obligations.</p>
<p><u>Question 4</u> If the answer to question 3 is yes, should the EIP Code include criteria or principles that the Commission must consider when granting an exemption? If so, are the criteria/principles outlined in this paper appropriate? Why or why not?</p>	<p>Yes criteria/principles should be included.</p> <p>Public interest, Compliance integrity and Proportionality criteria/principles are appropriate as they support maintaining minimum standards of service.</p> <p>Temporariness is not appropriate inclusion as a permanent exemption may be more appropriate in circumstances where obligations for certain entities may be identified as unsuitable or obsolete</p>



<p><u>Question 5</u> Should the EIP Code be more explicit in requiring historical data to be segmented in the same manner as the reporting period data? Why or why not?</p>	<p>Yes, to ensure clarity and consistency in reporting requirements across all entities. Quarterly reporting would be an appropriate frequency.</p>
<p><u>Question 9</u> Should generators continue to be required to report their performance under the EIP Code, particularly given the evolving market dynamics in the Darwin-Katherine, Alice Springs and Tennant Creek power systems? Why or why not from a cost-benefit perspective?</p>	<p>Yes, performance should continue to be reported. The level of penetration of third party generators is still very limited and Territory Generation continues to be the dominant player. To keep the cost-benefit manageable this should be limited to annual reporting and information should continue to be collated before being reported publicly. Note that renewable generators may require different performance indicators as they should not be considered to be unavailable if they are resource constrained.</p>
<p><u>Question 11</u> Has the entry of new privately-owned competitors in the Darwin-Katherine power system changed the need for oversight in that power system?</p>	<p>Not yet; as commented in Question 9 above, the penetration of privately owned competitors in the Darwin-Katherine power system is still limited as the System Controller has not, in the great majority of cases, allowed commercial operations.</p>
<p><u>Question 13</u> Should Territory Generation be treated differently in terms of reporting requirements due to its government ownership and majority position, particularly where it is the only licensed generator in the Alice Springs and Tennant Creek power systems? Why or why not?</p>	<p>Yes, owing to Territory Generation's continued dominant position it should be subject to more rigorous reporting requirements ensuring transparency to meet public expectations.</p>



<p><u>Question 14</u> 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?</p>	<p>No, the current availability related performance indicators (AF, UAF, EAF, FOF, EFOF) are not well suited for PV generation. PV generation is variable in normal operation due to variable resource (irradiance) availability and such variability should not be included in the calculations of the performance indicators. If the resource availability is excluded from the calculation of the performance indicators (by explicitly stating that resource availability is excluded from planned outages, unplanned outages and unit derating), then the PV generators can report on the existing unit availability related performance indicators. However, these indicators will then have a reduced benefit.</p>
<p><u>Question 15</u> 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?</p>	<p>Licensees of traditional thermal generation should not be excluded from generating unit availability reporting as this provides a good metric to identify poorly maintained generating units within a power generation facility.</p> <p>Licensees of PV generation could report on:</p> <ul style="list-style-type: none"> <li>- availability as a measure of time a PV inverter is in service vs total time irradiance is above a certain threshold;</li> <li>- Inverter maintenance hours: number of hours an inverter is offline to perform maintenance</li> </ul>
<p><u>Question 16</u> Is the reporting of SAIDI and SAIFI by generators relevant and appropriate? Why or why not?</p>	<p>Reporting of SAIDI and SAIFI by generators is not appropriate as these are network level indicators. It does not make sense to report on these at a generator level</p>

If you have any questions on this submission, please do not hesitate to contact me.

Yours sincerely,

Simone Rizzi