

Record No: TGD2020/65352
Container No: TGF2020/01-02

Lyndon Rowe
Utilities Commissioner
Utilities Commission of the Northern Territory
GPO Box 915 Darwin NT 0801

By email: Utilities.Commission@nt.gov.au

Dear Mr Rowe

Electricity Industry Performance Code Review – Issues Paper

Thank you for your letter dated 16 September 2020 regarding the above matter.

Territory Generation (TGen) appreciates the opportunity to make this submission and provides comments to selected questions in the Issues Paper below.

Question 11

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

Question 12

If the current Schedule 2 generator services performance indicators are appropriate for current and future generators, including renewable energy and batteries, what indicators should the commission consider, and why?

Category of availability

- There are current scenarios (such as low load) when TGen generation plants are excluded from being dispatched (by system security constraints) while being available for service if needed. Basically, generators are available for dispatched but constrained from being dispatched by System Control and therefore unavailable.
- In these cases, either:
 - an additional category is required; or
 - guidance is required on how to report these situations, if required.

Gross maximum capacity (GMC)

- Current schedules are not suitable for batteries or solar and other renewables.
- The GMC for a battery requires clarity for the following reasons:
 - inverter capacity and battery capacity are two different values;
 - inverters are capable of supply and consuming power. Clarity around the provision of information on the energy of import, export or the average of both, should be addressed; and
 - batteries can become fully charged or discharged. When fully charged it is unable to provide import service while export is available, and vice versa for when it is fully discharged.

Solar generators

- It is not clear as to whether a solar farm is considered 'available' at night. Generally, if an asset cannot generate electricity then it is considered unavailable.
- Is GMC adjusted to represent hours when the sun is available?

SAIDI and SAIFI (System Average Interruption Duration and Frequency Indexes)

- Generators do not know which customers are affected when an outage occurs. The data is provided by the network operator. A generator will know if they had a machine involved in an event but may not know if other generators were involved until the final report is issued.
- Power and Water Corporation (PWC) provides information which allows TGen to calculate SAIDI and SAIFI. PWC is changing its current system and this may affect TGen's ability to identify generation caused events.
- As more generators enter the Darwin Katherine electricity network, individual generators may no longer be able to report generation SAIDI and SAIFI as an event may involve multiple parties.
- The network operator/ system controller / market operator is better equipped to report on SAIDI and SAIFI. They have access to all the data from various generators and system participants.

Question 14

Should generators be required to report to the commission in relation to performance and condition monitoring, and why?

Generators should not report in relation to performance and condition monitoring.

- Condition monitoring is a very large field, and if made mandatory, it would create onerous reporting obligations and additional resourcing.
- As part of their business, generators do carry out adequate levels of condition monitoring and that should not become a mandatory reporting obligation in the already heavily regulated industry.

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?

If condition monitoring is determined to be needed, it should be limited to high level reporting only.

If you have any queries, please contact Hieu Nguyen, General Counsel and Company Secretary by email hieu.nguyen@territorygeneration.com.au or by phone on 79792509.

Yours sincerely



Gerhard Laubscher
Chief Executive Officer

28 October 2020