

16 August 2017

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

Dear Justin

Request for Submissions on Guaranteed Service Level Code and Electricity Standards of Service Code

EDL has reviewed the *Statement of Reasons, Proposed Amendments to the Electricity Standards of Service Code and Guaranteed Service Level Code (Statement of Reasons)*, as well as the proposed *Electricity Industry Performance Code (Proposed Code)*.

In response, EDL reiterates the position stated in its letter of 28 July, 2017 that the application of SAIDI and SAIFI metrics are more relevant to network operators than to electricity generators.

Specifically, EDL is concerned that the inclusion of SAIFI and SAIDI measures in the proposed **generation service performance indicators** will be unworkable.

This is due to the fact that EDL has no visibility of customer supply interruptions caused by generator outages. It is also unclear how SAIFI and SAIDI would be calculated where EDL's generation facilities are islanded, or forced from the network due to factors outside of its control.

Notwithstanding the challenges associated with supplying electricity in the Northern Territory, the network is interconnected and also has the benefits of redundancy to mitigate the impacts of generation outages on customers.

It is therefore EDL's view that responsibility for providing grid stability rests with the network service provider. Accordingly, it is appropriate that the measurement and reporting of SAIFI and SAIDI also sits with the network service provider, rather than individual generators.

To conclude, EDL confirms that it supports the Utilities Commission of the Northern Territory's (**Commission**) approach to streamlining its codes and appreciates the focus on minimising the administrative obligations on licence holders.

EDL remains willing to work with the Commission on the development of the Proposed Code so as to ensure that any changes are practical and effective for all parties.

Please let me know if you would like to discuss any of the points above, or require additional information.

Kind regards



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