



28 October 2020

Mr Lyndon Rowe
Commissioner
Utilities Commission
GPO Box 915
Darwin NT 0801

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

Dear Lyndon

Electricity Industry Performance Code Review — Issues Paper

Thank you for the opportunity to provide a submission on the Commission's Electricity Industry Performance Code (Standards of Service and Guaranteed Service Levels) (the Code) Review Issues Paper (the Paper) published on 16 September 2020. EDL has the following comments:

- Question 2 — Application: Yes, it would be useful for the Code to include additional clarification that it applies only to the Darwin-Katherine, Alice Springs and Tennant Creek power systems. This would help make it clear that the Code does not apply to EDL's McArthur River power station which operates under an Independent Power Producer (IPP) licence.
- Question 3 — IPP licensees: Yes, IPP licensees should be excluded from the definition of "generation services", especially where the IPP licensee is not providing generation services to the network as is the case with McArthur River.
- Question 5 — Independent audit obligations: We believe the Audit Guidelines should be kept separate from the EIP Code as these are not rules, rather recommended guidelines. The Commission should streamline the Guidelines to remove all overlaps to the EIP Code.
- Question 11 — Current generation SPIs: EDL maintains its previously expressed position that SAIDI and SAIFI are not relevant performance indicators for generators and should be excluded. In addition, the current Schedule 2 Generation SPIs are not appropriate for renewable energy and battery generators, as irradiance and wind resource are not currently taken into consideration. Finally, given batteries are a storage facility rather than a generation source, modification to the performance indicators may be required.
- Question 12 — Future generation SPIs: See response to Question 11 above.
- Question 13 — SPI anomalies: Yes, the Commission's direction adequately addresses the identified issues.



- Question 14 — Performance and condition monitoring: EDL considers that it is the generator's responsibility to manage the risk of condition monitoring and that reporting to the Commission should be limited to output indicators only.
- Question 15 — Performance and condition monitoring: See response to Question 14 above. A generator's requirement to report to its customers is sufficient.
- Question 34 — Additional stakeholder issues: Regarding Clause 6.2.4, EDL submits that the requirement to provide a list of potential auditors is unnecessary. The nomination of a single preferred auditor should suffice to address the Commission's requirement. If the Commission disagrees with the appointment, the electricity entity should renominate.

Should you have any questions or wish to discuss this submission further, please do not hesitate to contact me on (08) 9365 4911.

Yours sincerely,

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

Neil Duffy
Commercial Manager RE