



13 August 2019

Ms Kimberlee McKay
Director
Utilities Commission
GPO Box 915
Darwin NT 0801

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

Dear Kimberlee

Generation Licence Variation Application from Eni Australia Limited

Thank you for the opportunity to provide comment on Eni Australia Limited's (ENI) application to vary their generation licence. Specifically, in your correspondence of 30 July 2019, you asked for comment as to "...whether the proposed generating plant will have the necessary characteristics to generate electricity of the appropriate quality for the Darwin-Katherine network."

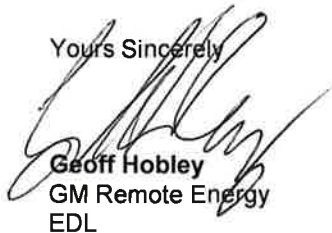
EDL notes that ENI's licence application states that the Generator Performance Standards, the PWC System Control Operating Protocol and the Draft Test Plan for Commissioning, "...will be complied with as appropriate.". EDL suggests that compliance with these standards should be complied with fully, rather than "as appropriate." EDL is also not appraised of the access conditions agreed between ENI and PWC, which may contain information pertinent to the generation of electricity of "the appropriate quality".

EDL also notes more generally that there is significant change expected in the Darwin-Katherine network. Specifically, the NT Government's Roadmap to Renewables identifies several key initiatives, including the development of a dynamic network model. Outcomes of this model include:

- Evaluating the impact of new generation at any connection node within the existing system;
- Identifying the best locations and optimal levels of renewable energy integration for connection to the network; and
- Providing information for establishing the technical requirements for connection to the network.

EDL notes that it may be difficult to determine whether the proposed generation plant will have the necessary characteristics to generate electricity of the appropriate quality until the dynamic modelling work has been completed.

Yours Sincerely



Geoff Hobley
GM Remote Energy
EDL