



28 July 2020

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

Dear Lyndon

**Re: Electricity Industry Performance Code – Independent Compliance Audit Guidelines
– EDL NGD (NT) Pty Ltd submission**

EDL has reviewed the proposed Independent Compliance Audit Guidelines (Guidelines) to be published in accordance with the Electricity Industry Performance Code (EIP Code) and the *Utilities Commission Act 2000 (NT)*, as described in the letter from the Utilities Commission dated 16 June 2020.

In response, EDL is supportive of the proposed Guidelines and makes the following comments:

- 1) Regarding developing the auditing scope to address clause 6.1.1(a) of the EIP Code, EDL requests consideration as to how an auditor will assess the influence of the volatility of natural resources (i.e. irradiance data) on the performance indicators.
- 2) With reference to section 4.1.5, EDL requests that if the Commission considers an electricity entity has not nominated a suitable independent auditor, then the Commission shall provide justification as to why the auditor is not suitable.

Should you have any questions or wish to discuss this submission further, please contact me on 08 9365 4911.

Yours sincerely,



Geoff Hobley
General Manager Remote Energy
EDL

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