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Dr Patrick Walsh
Utilities Commissioner
Utilities Commission
GPO Box 915
Darwin NT 0801
By email: utilities.commission@nt.gov.au

Dear Dr Walsh

Submission in relation to Trutinin NT Pty Ltd Generation Licence Application

Territory Generation (**TGen**) appreciates the opportunity to provide a submission in relation to the Trutinin NT Pty Ltd (**Applicant**) application for a Generation Licence for a 12MW gas-fired power generation facility located at Hudson Creek and connecting to the Darwin-Katherine electricity network (**Application**).

T-Gen has no objections the Application, however notes the following:

(1) Ancillary Services

TGen queries how the Applicant will contribute to the provision of ancillary services currently undertaken by TGen. TGen welcomes a discussion with the Applicant, as well as the Utilities Commission and other electricity entities to appropriately address this matter.

(2) Project Description

As the Applicant's project description, described in the Application as Appendix Q has not been made publicly available, TGen is not in a position to understand the details of the Applicant's proposed project and how it will impact on TGen's operations. For example, it is unclear whether the 12 MW capacity will come from a single unit or multiple units.

(3) Gentailer

T-Gen notes that the Applicant is a related body corporate to Rimfire Energy Pty Ltd, which is a licensed Retailer in the Darwin-Katherine network, and to Batchelor Solar Farm Pty Ltd, a licensed solar generator in the Darwin Katherine network. As such, the grant of this generation licence to the Applicant (in conjunction with the previously granted generation licence for the Batchelor solar operations) will mark the first active 'Gentailer' entrant to the Darwin Katherine power system. It is unclear how the market rules in the Northern Territory electricity market will deal with pricing that may lessen competition which would inevitably result in increased electricity prices for consumers.

(4) Stand-By Power Arrangements

TGen queries how the Applicant will meet its market customers peak demand at all times and if stand-by arrangements with TGen will be required. The matters raised in paragraph (2) above, particularly in relation to single or multiple units, will affect the likelihood and magnitude of such stand-by power arrangements. TGen welcomes a discussion with the Applicant, as well as the Utilities Commission and other electricity entities to appropriately address this matter.

T-Gen appreciates the opportunity to provide this submission and would welcome further consultation with the Applicant, Utilities Commission and other electricity entities.

If you have any queries or require further information please do not hesitate to contact me on (08) 7979 2509 or at hieu.nguyen@territorygeneration.com.au

Yours sincerely

A handwritten signature in black ink, appearing to be 'Hieu Nguyen', with a stylized, flowing script.

Hieu Nguyen
General Counsel & Company Secretary

18 September 2018