

24 October 2024

Lyndon Rowe  
Utilities Commissioner  
Utilities Commission of the Northern Territory  
Level 3, NT House  
22 Mitchell Street, Darwin NT 0800

By email: [utilities.commission@nt.gov.au](mailto:utilities.commission@nt.gov.au)

Dear Commissioner,

**Subject: 2024 ELECTRICITY INDUSTRY PERFORMANCE CODE REVIEW – CONSULTATION PAPER**

Rimfire Energy (“Rimfire”) welcomes the opportunity to provide its comments to the Utilities Commission (“Commission”) regarding the *Electricity Industry Performance Code Review*.

Rimfire has noted the key areas that the Consultation Paper has focused on for the review and responds accordingly to the 26 questions raised in the consultation paper.

*Q1. Are there any administrative or minor improvements to the EIP Code that stakeholders have identified and would like to bring to the Commission's attention?*

Rimfire does not consider that there are any necessary administrative or minor improvements to be made to the Code.

*Q2. Is the current reporting exemption provision under clause 5.1.3 of the EIP Code appropriate for licensees in terms of ensuring EIP Code reporting compliance? Why or why not?*

Rimfire considers the current clause appropriate for its retail reporting obligations, particularly following the move of the reporting requirement under the Compliance Framework and Reporting Guidelines to 30 September.

*Q3. Should there be a broader exemption clause in the EIP Code to cover more than reporting obligations? Why or why not?*

Given our response above and that Clause 5.1 relates specifically to reporting – Rimfire does not believe there is need for the exemption clause to be broadened.

Q4. Not applicable due to our answer to question 3.

*Q5. Should the EIP Code be more explicit in requiring historical data to be segmented in the same manner as the reporting period data? Why or why not?*

Rimfire does not have a firm view on this matter but does not oppose it being included if the Commission considers it to be necessary.



*Q6. What challenges, if any, do entities face in segmenting historical data, such as quarterly? How could these challenges be addressed?*

As Rimfire have been maintaining quarterly data for quite some time, we do not consider that we will have any challenges to address.

Q7 – 20. - Rimfire has no comment on these questions.

*Q21. How might the proposed changes to the AER's performance reporting procedures and guidelines impact stakeholders' associated operations and reporting under the EIP Code?*

In recognition of the uniformity of reporting that alignment of the EIP Code with the AER Retail performance reporting procedures and guidelines will bring, Rimfire is very supportive of the concept. One point of positive impact of this is that vendors of tools and software for the energy market will be able to provide solutions to the market that will allow ease of reporting. This may not be the case should the EIP Code not directly align with the AER reporting procedures.

*Q22. Are there specific challenges stakeholders foresee with implementing the AER's proposed changes to relevant indicators and are associated refinements to the EIP Code required?*

Rimfire does not foresee any challenges, and the benefits have been outlined above.

Regards,



Dale Chesson

Compliance & Safety Manager

