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

Dear Mr *Lyndon* Rowe,

Proposed amendments to Section 7: Power System Incident Reporting Procedures in the System Control Technical Code

Power and Water appreciates the opportunity to propose the attached amendments to Section 7: Power System Incident Reporting Procedures in the System Control Technical Code. These amendments are the result of industry consultation conducted over the course of 2021 and subsequent valuable discussions between Power and Water and the Utilities Commission.

The System Controller published proposed amendments to section 7 of the System Control Technical Code on 14 May 2021 and undertook a consultation process. This consultation process resulted in submissions made by Energy Developments Limited, Territory Generation and Power and Water Corporation – Power Services (as the Network Operator). A submission to the Utilities Commission containing the proposed amendment to Section 7 of the System Control Technical Code was provided in September 2021.

The purpose of the proposed amendments are to:

- Institute a broader based and more practical determination of what constitutes a reportable incident that represents a significant adverse effect on power system security or the reliability of the power system;
- More clearly defines the respective roles of a System Participant and the Power System Controller in respect to incident reporting; and
- Establishes the requirement that the Power System Incident Reporting Guideline define
 - the criteria that determines if an incident is a reportable incident;

- the form, manner and content of notifications and reports that are required; and
- the factors and other considerations to be taken into account in assessing the matters relating to incident reporting.

In the course of discussions with staff of the Utilities Commission regarding the proposed amendments of System Control Technical Code it was necessary to make additional amendments relative to the version proposed during the course of industry consultation. The reason for these additional amendments were to ensure that:

- The Power System Incident Reporting Guideline did not in itself create or amend the application of obligations additional to or in variance to those in the System Control Technical Code;
- The Power System Controller does not attain powers in the Power System Incident Reporting Guideline not defined in the System Control Technical Code;
- The content of the Power System Incident Reporting Guideline is limited to that of an informative nature pertaining to the criteria for reportable incidents, the incident investigation process and structure of the Brief Report and Final Report; and
- Quarterly Reporting obligations of the Power System Controller are removed as Power and Water believes that Half Yearly Reporting is sufficient.

It is important to note that the amendments to the System Control Technical Code consultation version has the effect of removing references to any obligations associated with the development, execution and enforcement of actions arising from recommendations presented in the Final Report. In the event that such actions were deemed advantageous to the operation and security of the power system, and such obligations do not exist in the System Control Technical Code or other relevant regulatory instruments, amendments to the relevant regulatory instrument would be required to facilitate the enforcement of such action(s) to prevent similar future reportable incidents.

If you have any further questions or require any further information concerning these proposed amendments please contact Simon Middleton, Senior Manager Electricity and Market Reform on 0409 581 482 or by email at Simon.Middleton@powerwater.com.au

Yours sincerely,



Djuna Pollard

Chief Executive Officer

20 March 2023