



30 August 2021

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

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

**Re: Consultation on Electricity Retail Supply Code Review – Issues Paper – EDL
NGD (NT) Pty Ltd submission**

EDL has reviewed the Electricity Retail Supply Code (**ERS Code**) Review, as described in the issues paper published by the Utilities Commission of the Northern Territory (**Commission**).

Please note although EDL is a registered retailer in the Northern Territory, we do not actively operate as a retailer in the NT electricity industry. EDL provides generic feedback only on this issues paper.

Relevance of the ERS Code

In the absence of any other legislated customer relations framework, EDL believes the ERS Code remains relevant.

Credit support requirements

Credit support requirements are best agreed between generators and retailers in private commercial arrangements. However, EDL notes it is prudent for an electricity market operator to secure credit support from retailers to ensure market liquidity. This is best addressed in the corresponding market rules.

Coordination Agreement

Rather than stipulate separate matters the Commission must approve, EDL suggests the Commission establish a default Coordination Agreement with approved terms which includes set timeframe for the Commission to approve. The network provider and retailers can then negotiate the consideration of these terms.

EDL suggests that if a retailer does not supply electricity to any customers, there should not be any requirement to enter into a Coordination Agreement with the network provider.

Dispute resolution process



EDL believes it is appropriate to include internal dispute resolution obligations on retailers and/or network providers, in line with other Australian jurisdictions.

Should you have any questions or wish to discuss this submission further, please contact me on 08 9213 8195.

Yours sincerely,

A handwritten signature in black ink that reads 'Neil Duffy'. The signature is written in a cursive, flowing style.

Neil Duffy
Commercial Manager Remote Energy
EDL