



11 August 2022

NT Electricity System Market Operator
Power and Water Corporation

By email: market.operator@powerwater.com.au

Re: 2022 NTEM SO Communications Guidelines and MSATS Procedure V1.0 Consultation – EDL NGD (NT) Pty Ltd submission

Thank you for the opportunity to provide feedback to the NTEM SO Communications Guidelines and MSATS Procedure (the Paper).

EDL is a leading global producer of sustainable distributed energy. We own and operate around one hundred power stations across Australia, North America and Europe including our Pine Creek generator connected into the Darwin-Katherine Power System (DKIS). This includes a number of power stations connected to the NEM.

Please note that 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.

Broadly, EDL supports the utilisation of platforms already established in the NEM, as outlined in the Paper. Using an existing system provides familiarity for many participants, and it should result in a cost-effective outcome. However, EDL would like to understand if any cost-benefit analysis has been performed to date, including a comparison to alternative systems?

Furthermore, if NTEM SO intends to recoup these ongoing costs via System Control and market operator fees, EDL would like to understand:

- the proposed mechanism for cost recovery (i.e. per MWh generated/traded, no. of customers, etc.); and
- how these proposed fees compare to the existing fees being borne by participants.

For the same reason outlined above, EDL supports using NEM documentation where appropriate rather than developing bespoke documentation for the NT.



Should you have any questions or wish to discuss this submission further, please do not hesitate to contact me on +61 8 9213 8195.

Yours sincerely,

A handwritten signature in blue ink that reads 'Neil Duffy'.

Neil Duffy
Commercial Manager RE
EDL