Record No: TGD2020/69659
Container No: TGD2020/1-01

Amelia Farmilo
Documentation & Implementation Manager
Electricity Market & Reform Team | Core Operations
Power and Water Corporation
GPO Box 1921 Darwin NT 0801

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

Dear Amelia

I-NTEM Dispatch and Pricing Procedure Consultation (Consultation Paper)

Territory Generation (**TGen**) appreciates the opportunity submit to this consultation. Please find TGen's submission attached.

For further information, please contact TGen's Manager Wholesale Markets and Products, Andrew Roberts, on 0436649896 or andrew.roberts@territorygeneration.com.au.

Yours sincerely

Eddie Mallan
General Manager Commercial

30 November 2020

TGen submission to PWC on the I-NTEM Dispatch and Pricing Procedure (Draft Procedure) Consultation:

Overview:

The recently implemented Power and Water (PWC) generator offer procedure has removed the opportunity for generators to revise their offer after gate closure. During the PWC consultation on this procedure, TGen provided feedback that it considered the removal of this ability would likely introduce inefficiencies, and cost, to the power system. This feedback has not been incorporated into the Draft Procedure and PWC notes in relation to the issue:[1]:

> Power and Water acknowledges that whilst this is not the most efficient outcome for TGen in the example provided, the requirements to make changes in systems and processes to allow changes in size of generators dispatched, without resulting in a misuse of market powers, is not necessarily the most efficient outcome for customers. Power and Water highlights that the market reform design proposed by the NT Government, and associated directional move to centralised dispatch, will eliminate inefficiencies in this area.
> Power and Water intend to publish a commitment and dispatch principles document for consultation in October. There is the potential for TGen to provide a proposal for addressing this inefficiency by an alternate method.

This draft dispatch procedure now under consultation states[2]:

> '… there is a strong incentive for Generators, other than Territory Generation, to offer their portfolios as self-committed generating units rather than fast-start generating units.'

TGen is unaware of any existing or intending Generator who intends to submit offers other than as self-committed- units. This statement, by PWC, supports the position that TGen has expressed in industry reform forums, being that TGen fulfills a role of Generator of Last Resort (GLR)[3]. That is TGen provides essential system services and maintains capacity that effectively underwrites the operation of the regulated power systems with the implied requirement to maintain sufficient installed capacity to meet peak system demand at all times.

It is TGen's position that the dispatch of TGen's plant to effect the security requirements and ensure that the demand is met should be done in the most efficient manner, at the least possible cost. It is important that this objective can be facilitated by the Dispatch procedure in the dynamic power system.

In the Darwin/Katherine power system, TGen's generating plant has been installed on a developing needs basis to fulfill the requirements of the entire power system. What differentiates TGen from other generators, existing and new entrants, is that TGen has multiple types of plant of varying age, including Frame 6 industrial gas turbines, a combined cycle steam turbine associated with two of those Frame 6 units; six aero derivative gas turbines of three distinct models; and four smaller gas turbines of two distinct models.

---

[1] https://www.powerwater.com.au/__data/assets/pdf_file/0016/52621/Generator-Offer-Procedure-and-Tie-Break-Procedure-Revisions.pdf, Ref #7
[2] Section 4.3
[3] https://www.powerwater.com.au/__data/assets/pdf_file/0021/24654/Territory-Generation-29th-March.pdf & https://business.nt.gov.au/__data/assets/pdf_file/0010/935380/territory-generation-ess-ip-submission.pdf

The gas turbine types vary significantly in size, fuel efficiency and maintenance costs. To gain the best economic dispatch from this fleet is dependent upon what the actual system requirements placed on TGen are, and the status of the TGen fleet at the time.

The projected requirements of dispatch are variable also:

- Historically:
  - Requirements were weather dependent, and the variability was able to be predicted with reasonable certainty a few days ahead
  - PWC system load forecasting was adequate
- In recent years:
  - Changes to system security requirements related to inertia and other factors has changed and significantly increased the requirements of TGen units to be dispatch below their ideal load profiles
  - The impact of behind the meter solar PV has made significant changes to the requirements to fulfill demand by TGen fleet, and further has significantly changed the predictability of the impact of weather patterns on the dispatch requirements within the day of operation. This impact has been incremental
  - PWC system load forecasting has, to date, evolved and has become less and less relevant to determining future TGen dispatch requirements
- In this last 12 months:
  - Behind the meter solar variability has increased significantly with up to 40 MW load swings experienced by TGen
  - System Security requirements on TGen plant have been increased and changes implemented, generally without consultation
  - PWC system load forecasting become less reliable, and as such almost irrelevant, to determining future TGen dispatch requirements
- In the near future, prior to full market reform:
  - Several large-scale solar PV generators will commence commercial operation
  - With increased private Generators, there will be more forced outages of generation plant that is beyond TGen's control where TGen is required to be dispatched as generator of last resort to meet the demand
  - System Security requirements may become more onerous
  - There is uncertainty if updated PWC system load forecasting, provided to TGen, will include both BTM and large-scale solar PV output at suitable horizons to and granularity to allow for the significant variation from both to be included in dispatch planning in the required time frames
  - Variability of the TGen dispatch requirements will become significantly less predictable and the timeframe to have any certainty of requirements on TGen plant will reduce to of the order of one hour ahead during daylight hours

TGen maintains that for the best economic dispatch outcome for the power system to be achieved in the future it is imperative that more flexibility, not less, in the dispatch process is required to meet the increasingly dynamic needs in the most efficient and economical manner.

TGen believes that the current dispatch processes, and proposed changes, make the dispatch of plant less flexible. If a flexible dispatch of plant is not adopted, this will result in non-optimal costs to Generators.

In response to PWC's invitation (as reproduced above) to propose an alternative to addressing these inefficiencies in dispatch, TGen makes the following proposal:

- When there is no impact on other Generators, the dispatch of Generators' fast start units should be flexible within the day of operation, and able to adapt to circumstances as they develop in real time. This includes, but not limited to:

- Changes in merit order as circumstances, both outside and within the Generator's control (load pattern changes, failure of generator plants)
- To achieve this, TGen would develop a guideline for the dispatch of TGen plant in consultation with System Control.
- Such a protocol would be designed to pick up where this draft procedure left off. This assumes that this draft procedure would affect the dispatch of self-committed plant.

Consultation Paper:

Section 2 of the Consultation Paper, 3rd point, indicates that one of the reasons for developing this procedure was to satisfy a Utilities Commission (**UC**) recommendation. For reference this recommendation[4] is reproduced below:

> *"4. To minimise the potential for System Control to advantage the Gas Supply business unit in the dispatch of generators:*
> - *the commission also recommends the Territory Government and PWC develop and publish a clear set of protocols for generator dispatch as part of the implementation of a wholesale electricity market for the Darwin-Katherine system. When these are published, System Control should publish information showing, with due consideration of commercial confidentiality:*
>
> *(i) which generators were dispatched from time to time*
> *(ii) how this satisfies the dispatch protocols."*

In section 3 of the Consultation Paper, TGen notes that the UC recommendation is to 'develop and publish a clear set of protocols for generator dispatch'. The Consultation Paper contemplates that this document is intended as a guide rather than be prescriptive. TGen believes that this guide is necessary to develop, and can include sufficient guidance to day of operation staff to facilitate sufficient flexibility in dispatch to achieve the most efficient outcomes.

Draft Procedure:

In response to certain individual sections of the Draft Procedure:

Other devices:
The proposed dispatch procedure does not appear to cover the dispatch of devices, such as batteries and synchronous condensers, that are considered as generator units by the System Controller. It is recommended that these are considered for inclusion in this version.

4.1 Key Obligations on the Power System Controller:

The last paragraph of section 4.1 indicates that the Power System Controller has obligations for the management of system security as it relates to the dispatch of generators. TGen recognises this function and obligation of the Power System Controller and encourages that the Power System Controller provides clear explanation(s) of its actions in undertaking this obligation.

4.2 Treatment of Ancillary Services:

The Draft Procedure contemplates that ancillary services are funded through the market. TGen notes that Clause A6.11 of the SCTC are not consistently applied across the regulated systems, for example there is

[4] https://utilicom.nt.gov.au/__data/assets/pdf_file/0004/910327/Final-Decision-Ring-fencing-Review-complete.pdf

currently no charge in the Alice Springs power system where there are multiple Generators, and that the quantum has not been amended in line with the significant changes implemented by the Power System Controller in services provided to the power systems.

It is clear that clause 5.1 of the SCTC places obligations on PWC to procure ancillary services in all three regulated power systems. This obligation has been in place since 2012. TGen notes that the procurement of ancillary services is generally undertaken through the issue of Risk Notices, and done so without financial consideration.

The opening paragraph of section 4.2 states: 'The current spinning reserve policy approximates Contingency Frequency Control Ancillary Services'. TGen suggests that this is an oversimplification. The current spinning reserve policy is not completely contained in any one document, but currently in a minimum of three. It was originally intended to be in the Secure System Guidelines, but appears to have been superseded by Risk Notices 2003064, 2010080 and 2005997.

Risk Notice 2003064 introduces increases in spinning reserve due to regulation frequency control ancillary service requirements. Risk Notice 2010080 introduces additional reserves that appear to increase contingency requirements. Risk Notice 2005997 relates to low system load requirements that introduces further restrictions on the operation of TGen's combined cycle plant and further dispatch requirements related to reactive power and voltage control requirements.

4.3 Process Overview:

The 'Process overview diagram' on page 9 of the Draft Procedure indicates that Risk Notices are taken into account in the pre-dispatch process.

Recent correspondence with PWC has indicated that the pre-dispatch takes into account Risk Notices that relate to generator availabilities and capacities but does not consider network outages that impact generation.

TGen believes that the pre-dispatch should consider all Risk Notices that impact generation dispatch. For example, a planned outage on the Channel Island to Manton 132kV line would island the Manton-Katherine region from Darwin, significantly impacting generation scheduling. To not take this into account in the pre-dispatch would render the pre-dispatch irrelevant.

Historically planned outages on sections of the single circuit 132kV line can extend over multiple weeks. A further example is planned outages of one of the Hudson Creek 132/66kV transformers, that usually have a Risk Notice placing constraints on Weddell Power Station output.

TGen suggests that, in undertaking the pre-dispatch process, PWC take into account Risk Notices for planned Network Outages that impact generation.

5.1 Generator Offers:

TGen understands that processes and procedures will be amended from time to time, and request that PWC provider appropriate notices and advices to market participants to enable all participants to contribute on implementation of changes into the live environment to ensure that sound change management practices are followed.

5.2 Load Forecast:

In the current form, the input of load forecasting into the dispatch process has immediate opportunities for improvement.

The load forecasting provided to system participants by the Power System Controller is not prepared at sufficient levels of granularity, timeliness, or accuracy for system participants to formulate meaningful generator offers. TGen understands that the Power System Controller is currently developing an updated forecasting capability, and suggests that this revised capability includes planned and maximum requirements on TGen's fleet in the context of providing ancillary services on behalf of the Power System Controller.

Whilst TGen does see some Risk Notices relating to other generators plant availability, with the forthcoming connection of multiple large-scale solar PV, their output is anticipated to not be as reliable as other thermal plant. Thus, the impact on the requirements on TGen's plant- will need to be incorporated into the existing PWC forecasting obligation.

TGen recognises the load in power systems is very much weather dependant and the current forecasting is produced and issued well ahead of the time period it is to be used for. For example, a forecast is issued on a Thursday to cover the Saturday, Sunday and Monday offer periods. TGen is required to submit an offer on Friday for each of these three days based on a forecast produced on the Thursday. TGen has observed significant forecasting errors that impact the dispatch and also impact how TGen would prepare to have its plant dispatched. However, the change in generator offer process has removed the ability of TGen to vary the offer.

TGen suggests that there would be benefit to system participants for the introduction of system forecast accuracy targets and metrics, that contain a minimum accuracy requirement similar to that incorporated in Generator Performance Standards for generators, to provide confidence in the forecasting provided by the Power System Controller across all regulated power systems.

In addition to the load forecasting obligations of SCTC clause 5.11, the Power System Controller has forecasting obligations under SCTC clause 3.11. TGen has made representation in relation to this in previous industry consultations[5]. TGen has also proposed a SCTC code change relating to clause 3.11 of the SCTC. This proposed change was not adopted by PWC[6], however PWC has provided an undertaking to the UC that it would consult with TGen to try and understand the reasons behind the proposed change as well as undertaking[7] to the UC that a streamlined code change proposal mechanism would be introduced. TGen understands that PWC has undertaken significant work in relation to forecasting and is looking forward to consultation prior to implementation of this work with the opportunity to have feedback considered in line with SCTC clause 1.8.2(c).

5.4 Risk Notifications:

Risk notices issued by the System Controller relate to generator plant outages and the generation or 'generic' system constraints. This includes the Risk Notices relating to generator constraints as a result of planned network outages.

TGen notes that PWC also uses Risk notices to implement changes to system security requirements and suggests that all Risk Notices be published on the PWC web site at a single location for each regulated power system.

---

[5] https://www.powerwater.com.au/__data/assets/pdf_file/0012/28110/Territory-Generation.pdf, Attachment A

[6] https://www.powerwater.com.au/__data/assets/pdf_file/0017/31427/GPS-final-submission-Appendix-D_Redacted.pdf-13.9.2019.pdf, PWC Ref# D.9, 54

[7] https://www.powerwater.com.au/__data/assets/pdf_file/0019/31429/GPS-final-submission-Appendix-F-Industry-Initiated-Code-Change-Proces.pdf

5.5 Network Constraints:

TGen believes that the pre-dispatch process should take into account Risk Notices relating to network outages that impact generation dispatch. PWC historically took into account these constraints in preparation of the load forecast and the pre-dispatch. In this paper, it simply states that these are not applied in pre-dispatch and where necessary, in real-time, the Power System Controller will alter the generation dispatch.

TGen requests that PWC reconsider its position and reinstate consideration of network outage Risk Notices that impact generation dispatch in the load forecasting and pre-dispatch processes.

5.6 Ancillary Service Requirements:

In the Draft Procedure, PWC proposes that it only consider ancillary service requirements in the real-time dispatch process, but none of the other processes. The current pre-dispatch process does place constraints on TGen's plant related to the current 'spinning reserve' requirements. For instance, two Frame 6 units are constrained on and 25MW capacity above the projected load is indicated. It seems that PWC is proposing to cease taking ancillary services into account in the pre-dispatch.

TGen requests that PWC update its pre-dispatch processes to take into account the current 'spinning reserve' policy that has 25/30/37/37+ MW of spinning reserve and one SPRINT to be kept in reserve. TGen believes that these should be taken into account in the pre-dispatch processes to understand what is predicted to be dispatched.

In real-time dispatch, TGen suggests that the ancillary service requirements should be made more transparent.
TGen's main comments in this area are:

- There is a lack of ability to ascertain the current constraints from a central source. This includes inconsistent means of communication of changes to Spinning Reserve and other constraint information.
- Consultation is only occasionally undertaken prior to issuing changes to spinning reserve and other system security constraints via Risk Notices.
- The inconsistent provision of rationale behind changes to Spinning Reserve and other constraints, including a lack of description relating to the risk assessment and if the controls being implemented are designed to effect likelihood or consequence.
- The lack of provision of live or even historical data on spinning reserve levels applied in real time.

These concerns are across all three regulated power systems. In recent months in relation to Spinning Reserve requirements for the Darwin/Katherine power system, TGen has received:

- Document titled, 'Generation Constraints – 2019-~ - raise day time requirements'. The document is known as a 'Short Term Advice'
- Risk Notice 2003064 Changes to Minimum Spinning Reserve for Darwin Katherine
- Risk Notice 2003064 V2
- Risk Notice 2003064 V3
- Risk Notice 2010080 SPRINT at WPS – System Security Constraints

The 'Short Term Advice' and Risk Notice 2003064 both change the Spinning Reserve levels from 25 MW to 30/37/37+ MW (at discretion of Grade 2 controller). The Short Term Advice appears to be an internal document within System Control that is dated 19 December 2019. TGen first received this information with the issuing of a Risk Notice on 25 March 2020, some 97 days later, about the same time the Short Term Advice document was provided to TGen. V2 and V3 of the Risk Notice 2003064 were issued on 20

July 2020 and 30 October 2020 respectively. Each version has extended the period that the Risk Notice applies.

Risk Notice 2020080 was issued by email on 16 November 2020, with immediate effect, and places a requirement to reserve one SPRINT at all times. Prior to this, it was only 'recommended' in Risk Notice 2003064 that a SPRINT be kept in reserve. TGen was unaware prior to receipt of the Risk Notice that a requirement resulting in further additional capacity being reserved over and above the spinning reserves specified was going to be implemented.

Clause 3.5 of the SCTC provides scope of what the Secure System Guidelines cover including principles regarding energy and capacity reserves. The clause further states that the Power System Controller can amend, or vary, the guidelines at any time (3.5.2) after consultation with System Participants (3.5.3). TGen believes that this is the only requirement in the SCTC regarding setting and advising of reserve levels. There is a clear requirement to consult on changes to reserve levels.

For Darwin Katherine power system, System Control has made and implemented changes to Spinning Reserve requirements by means of Risk Notice and/or Short Term Advice that have potentially rendered the specifications of spinning reserve in the Secure System Guidelines redundant. The Risk Notices are issued by email to large distribution lists and are not published. The only way for an affected person to confirm if they have the latest version is to be on the mailing list and maintain a record. For the operational controllers this should not be an issue, but for other staff, not following the evolution of the Risk Notices, it is cumbersome. The recent release of the Risk Notice relating to SPRINT is a reserve requirement and is in a separate document to the spinning reserve document, further adding to potential confusion.

The actual dispatch of reserves in the Darwin-Katherine system is undertaken by System Control's Grade 2 desk and TGen has no way of knowing what reserve limits are being applied to the dispatch, either in real time or historically.

As the current provider of all Spinning Reserve services to System Control, TGen believes that it is not unreasonable to:

- Be consulted prior to proposed changes being implemented, under normal operations and advised after the event in emergency situations
- Be provided rationale of changes, including detailing of studies undertaken to determine the new levels implemented
- Be able to easily access from a central source the current defined constraints in operation
- Receive live feed of the level of spinning reserve being applied. This is particularly relevant in Darwin Katherine power system where the Grade 2 operator currently has discretion as to what reserve level to apply.
- Expect System Control to periodically report on the efficiency of the dispatch of reserves against the defined requirements.

Whilst TGen, in its current role of providing ancillary services, believes that these are reasonable expectations of System Control. TGen also believes that this level of transparency should be afforded to all system participants, both current and intending. If implemented, this would provide a greater understanding to all stakeholders as to the workings of System Control in its undertaking of its obligations.

6.3.2 Frame 6 / FCAS Units:

The Draft Procedure states: 'The Power System Controller is required to maintain a minimum number of Frame 6 generating units online at different network locations.' TGen considers this is undertaken at the direction of the Power System Controller as specified in various documents, discussed earlier in this submission, and not a requirement of the Power System Controller.

As far as the pre--dispatch process is concerned, the acknowledgement that this is a requirement appears to be an acknowledgement that there is at least some consideration of the ancillary services in the pre--dispatch process. This is contrary to the statements made in Section 5.6 of this draft document.

The Draft Procedure states that the requirement for a number of Frame 6 units online will move from fixed to become dynamic early in 2021. TGen would appreciate PWC providing early advice and consultation with TGen on what implications this will have on TGen's dispatch so that TGen can assess impacts on maintenance and corporate planning processes.

6.4 Pre-dispatch Solution Process:

The diagram provided does not appear to include the system security dispatch requirements, such as those mentioned in 6.3.2.

7.2 Inputs:

The Draft Procedure indicates that real-time dispatch utilise the capacity information provided through the pre-dispatch process. During the implementation of the current generator offer process; it has become apparent to TGen that the overload capacity of the Frame 6 units is unlikely to be included in future offers and thus will not be apparent in the pre-dispatch process. In correspondence on this issue, the overload capacity would still be taken into account in the real-time dispatch. This seems contrary to the statements made in the sub points of the first dot point. TGen is concerned that the overload capacity will no longer be considered in the spinning reserve requirements if these statements in this Draft Procedure are taken literally.

7.3 Process:

Recently PWC has implemented the new Generator Offer Procedure and it has become apparent to TGen that there are elements of the previous Generator Offer/Dispatch practices, that have been operating since the INTEM started in May 2015, that were no longer going to be continued under the new Generator Offer Procedure. These include:

- Overload capacity of Frame 6 units is no longer within the definition of Band 3
- Removal of the ability to modify the offer, or merit order, of TGen plant should there be a change in circumstance
- The dispatch of the water injection capabilities (defined as Band 3) on some TGen plant, notably the Weddell units.

The main water injection capacity on TGen plant is SPRINT. SPRINT is a GE propriety term that is short for Spray Intercool, a form of water injection employed on LM6000 gas turbines. On the Weddell Power Station units, it increases the capacity from around 34MW to 42MW, about an 8MW increase. SPRINT is currently manually enabled. SPRINT is not intended to be used all the time, it does come with a maintenance impact if it is used continuously but when used for relatively short periods, it does not impact maintenance.

The practice that has been undertaken in dispatch of SPRINT is summarised as follows:

- On a rising system load, SPRINT has been used to increase capacity and increase the output on one machine to lower the output on other machines to increase the spinning reserve available. When the system load increased further that the spinning reserve was reaching the required limits, a second SPRINT can be deployed if there are sufficient machines online. Again, as the load increased and the spinning reserve approached the threshold, another machine would be dispatched, and the one or two SPRINTs turned off. This dispatch practice delayed the need to start another generating unit and increased the overall efficiency of generation and thus improves economic outcome of the dispatch.

- To meet the peak load, the dispatch of SPRINT can often prevent dispatch of another generating unit. This has become useful to assist with change in demand pattern due to solar PV which has created a morning peak requirement for TGen plant, prior to the system load 'duck curve' effect due to solar PV.
- On a falling load SPRINT is dispatched to enable taking another generating unit offline earlier. Again, improving both the efficiency and the economic outcome of the dispatch.
- A fourth way that SPRINT has been utilised traditionally is to provide a very fast increase in online capacity in the case of a generator fail to start or trip, effectively buying time to start another unit. The value of this use of SPRINT is clearly apparent to System Control for security purposes. System Control have formally issued Risk Notice 2010080 'SPRINT at WPS – System Security Constraints'. This Risk Notice is a formal direction by the Power System Controller requiring that a SPRINT be kept in reserve. The first time this requirement has been formally directed. This was issued on 16 November 2020.

Utilising SPRINT in this manner has been a significant contributor to both system security and economic dispatch.

The section from the draft procedure titled 'Fast-start units' is reproduced below:

> *"Fast start generating units will be committed if and only if more capacity is required above that supplied by the self-committed generating units or if they are required for system security reasons. When there in a need to commit a fast start generating unit, the Power System Controller will assess the likely duration for which the additional generation capacity is needed. If the assessment is that the additional capacity is likely required for not more than 4hours, this will be considered a short run. If the assessment finds that the additional capacity is needed for more than 4hours, this will be considered a long run.*
>
> - *In the case where it is determined that a fast-start generating unit is required for a short run, the Power System Controller will start the next generating unit (or incremental band 3 capacity if the associated unit is already online)from the short run commitment merit order that is not presently running.*
>
> - *In the case where it is determined that a fast-start generating unit is required for a long run, the Power System Controller will start the next generating unit (or incremental band 3 capacity if the associated unit is already online)from the energy and tie break merit order that is not presently running.*
>
> *When committing from either of these merit orders the order will always be used regardless of the size of that quantity including in the circumstance where multiple generating units may be required to start at the same time. That is, small generating units (or band 3 quantities) that are considered too small to likely cover the increase in load will not be skipped in favour of larger units."*

If this change in dispatch practices were to occur, it is likely that SPRINT will not be able to be dispatched because it will always have to fit into a location in the dispatch order, according to its offered value. It will then remain on, even after the next TGen generating unit is dispatched.

This section spells out a significant change to dispatch practices that effectively eliminates the economic benefit of SPRINT. Further, this will likely result in there being no economic imperative for TGen to maintain the SPRINT capability and result in a reduction in benefit to system security.

Another outcome from this proposed section is that smaller units dispatched will remain online even after a larger unit comes online. TGen has some smaller units at Katherine Power Station that have often been

used to be dispatched to meet a small expected increase in system load, to meet the peak, in lieu of starting a larger generating unit. This results in the greater efficiency of the overall dispatch than the alternative of starting a larger unit. Because of the removal of the ability to revise the generator offer in changes in circumstance, combined with this proposed change in dispatch practices means that the economic benefits of having smaller units available for dispatch will be diminished.

Conclusion:

TGen submits that the proposed changes to dispatch practices in the current Draft Procedure form and the recent changes implemented will not benefit the system and disadvantages TGen. TGen reiterates that the only generator functionally impacted is TGen and TGen believes that the proposed procedure does not satisfy the principals of 'security constrained economic dispatch', one of the foundation objectives of the Draft Procedure stated by PWC.

TGen suggests that it is in the interests of the Territory, for TGen, and PWC to undertake practical consultation on the detail of the proposed changes and consider the TGen proposal to develop a protocol for the dispatch of TGen fast-start generating units that is in keeping with the principle of 'security constrained economic dispatch', with the proviso that this will not impact the operation of other Generators.