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System Control Plant Outage Procedure

Introduction

Assure Energy Asset Pty Ltd (as trustee for the Assure Energy Asset Trust) (**Assure Energy**) is pleased to submit the following feedback in relation to the Power and Water Corporations (PWCs) draft Generator Forecasting Compliance Procedure.

Assure Energy is the parent entity of its two wholly owned special purpose vehicles: Assure Energy NT Robertson Pty Ltd (as Trustee for the Assure Energy NT Robertson Trust) and Assure Energy NT Darwin Pty Ltd (as Trustee for the Assure Energy NT Darwin Trust) (**Assure Energy SPVs**).

The Assure Energy SPVs entered into power purchase agreements with the Commonwealth of Australia, represented by the Department of Defence, on 2 April 2019 in respect of a project involving the design, construction, operation and finance of two on-base solar photovoltaic power stations and associated batteries at Robertson Barracks and RAAF Darwin (**Project**).

The power stations are under construction and scheduled to commence commissioning in the next couple of months and will be indirectly connected to the Darwin – Katherine interconnected transmission system via Defence substations located at Robertson Barracks and RAAF Darwin. Electricity generated from these facilities will primarily be used by Defence with any excess generation above the Defence load to be exported to the grid.

We appreciate the ongoing engagement and involvement of stakeholders in the development of the System Control Plant Outage Procedures and we provide our feedback below.

Summary of feedback

The System Control Plant Outage Procedure put forth by PWC provides reasonable guidance for how Plant Outages procedures will work. However, from a generator perspective we have found issues with;

- the level of detail concerning cancellation of planned outages
- additional controls regarding outages in “Wet Season”
- details in regard to outage requests to System Control

These concerns are raised in greater detail within the paragraphs below.

Does the procedure provide sufficient detail on the outage planning processes?

To gain a full understanding of the outage planning process, Assure requires greater detail on how the procedures are expected to function, more specifically;

- Planned outages maybe cancelled by system control for a number of reason beyond the control of Power Producer, no detail is provided on how/if any costs incurred by late cancellation by PWC can be passed on (Section 8.1).
- Any outage that occurs during the “Wet Season” may incur additional controls or not be permitted to occur at all. Further details are required for consideration.
- Outage requests to system control need to be submitted a minimum of 30 days in advance and take 14 days for a response which can be rejected for too much or too little documentation amongst other

reasons for rejecting the outage request. More specific details on documentation is required for consideration. (Section 5)

- The Opportunistic maintenance section does not mention Solar Generators where night-time provides an opportunity for maintenance activities to occur (Section 7.1.3). Assure would prefer that any opportunistic maintenance occurs at night so that solar generation is not affected.
- Further explanation on the extension procedure is required, there is a disconnect between when an outage extension request must be submitted and when PWC will provide a revised risk notification for testing.
- Document discussed a nominated Generation Outage Testing Request tool but does not details how this is accessed (Section 12).

Is the procedure suitable for use by the System Controller?

The procedures require greater detail to enable a complete understanding of the cost and risk involved with non-compliance. For PWC's proposed procedure to be suitable Assure Energy suggests further information is required for the following:

- Further information on "Wet Season" including dates, additional controls and reasoning why it would not be permitted (Section 4.1).
- More specific detail on what documentation is required for the Preliminary Assessment response (Section 6.2).
- What is the minimum notice period regarding Out of Service - plant disconnected from the system (Section 7.1.1).
- Details or an example of the Risk Notification to be provided or referenced under the procedure (Section 7.3).
- What are the penalties for a Forced Outage (Section 9.2).
- Where is access provided to the Power System Controller's nominated Generation out Testing Request Tool (Section 12).

Thank you for the opportunity to provide feedback on these procedures. Please do not hesitate to contact me should you have any questions in relation to this submission.

Yours sincerely,



Shane Rishani

Power Producer Representative, Assure Energy