



13 July 2021

Power System Controller
Power and Water Corporation
GPO Box 3596
Darwin NT 0801

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

Re: Consultation update #2: System Control Technical Code – Power System Incident Reporting Procedures – EDL NGD (NT) Pty Ltd submission

We refer to our submission dated 29 June 2021 (Submission #1) concerning the proposed changes to the System Control Technical Code (Code) and the Power System Incident Reporting Guideline (Guidelines).

EDL has reviewed the discussion points following the meeting between the Network Operator and System Controller (Consultation update), as published by the Power System Controller (Power and Water Corporation) on 9 July 2021.

EDL makes the following comments to the discussion points in the Consultation update:

1) *Minor Reportable Incident Thresholds:*

EDL acknowledges the Network Operator and Power System Controller are best placed to understand the impact, or potential impact, of an incident to the reliability or security of the power system. As per Submission #1, EDL is supportive of setting an appropriate threshold for incident reporting with a mechanism to be reviewed on a periodic basis. In principle, we agree that focus should be directed to key reliability events.

2) *Application of Major Reportable Incident to Alice Springs and Tennant Creek:*

As a generator in the Darwin-Katherine power system only, EDL reserves comment on the application of major reportable incidents to Alice Springs and Tennant Creek.

We note the Network Operator's comments on the number of repeat security events in Alice Springs and Tennant Creek as more akin to a reliability issue. As per EDL's submission on NTEM priority reforms dated 7 April 2021 we are supportive of a centralised Reliability Manager, ideally an Independent Market Operator, to procure the necessary capacity and services to address system security and reliability concerns in each individual power system.



3) *The timelines for reports on Alice Springs and Tennant Creek systems:*

As an owner/operator of remote power microgrids, EDL understands the logistical challenges of investigations following system incidents. EDL is supportive of reporting timeframes that are appropriate to the different power systems.

4) *Context of the Incident Reporting Guidelines in the consultation:*

EDL understood the Guidelines formed part of the formal consultation. Further to EDL's response to question 2 in Submission #1, the Guidelines place obligations on System Participants and should be considered before the Utilities Commission makes a determination on the proposed changes to the Code.

5) *Refinement of recommendations and actions:*

Further to EDL's response to question 2 in Submission #1, EDL considers agreed actions following major reportable incidents should be resolved promptly. Noting that the purpose of the reporting process is to agree necessary actions to prevent recurrence. EDL agrees other recommendations should not require the same level of tracking and resolution.

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 blue ink that reads 'Neil Duffy'.

Neil Duffy
Commercial Manager Remote Energy
EDL