

27 February 2019

Samantha Byrne
Senior Director Utilities Reform
Department of Treasury & Finance
Northern Territory Government
GPO Box 1974
Darwin NT 0801

By email to DTF.UtilitiesReform@nt.gov.au

Dear Samantha,

Subject: Reliability Standard Consultation

Rimfire Energy welcomes the opportunity to provide its submission regarding the Reliability Standard Consultation.

We acknowledge that there a number of specific consultation questions within the consultation paper regarding various potential reliability standard options across the three electricity grid systems of Darin-Katherine, Tennant Creek and Alice Springs.

However, we also believe that responses regarding the majority of the consultation questions are best provided by other market participants and/or stakeholders in this instance, particularly as they relate to the possible adoption of different technical reliability standard measures across three different grids with three different demand profiles, and the fact that any adopted reliability standard must be balanced with system security considerations and especially so in small network regions such as Alice Springs and Tennant Creek.

That said, Rimfire Energy would like the following points noted as part of this consultation process:

1. Rimfire Energy believes that the adopted reliability standard across the three grids in the Territory should all be customer focussed forms of a reliability standard.
2. Rimfire Energy agrees that the preferred option for the Darwin-Katherine grid would be a Loss of Load Hours measure, due to the relatively flat demand profile across the wet and dry seasons, the larger physical size of the network and the amount of synchronous generation plant operating in the region.

Regards

Warwick Lyon
General Manager - Retail

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