

Epuron Solar Pty Ltd
Level 11, 75 Miller St
NORTH SYDNEY, NSW 2060

2 June 2017

**Mr Malcolm Conway
Power System Controller
Power & Water Corporation
GPO Box 1921
Darwin NT 0801**

By email

Dear Mr Conway,

Draft Secure System Guidelines - Consultation

The Epuron Solar portfolio includes nearly 7 MW of operating solar photovoltaic assets distributed across the NT, including the 4.1 MW Uterne Power Plant at Alice Springs. We therefore appreciate the opportunity to submit feedback on the draft Secure System Guidelines (SSG).

Epuron has a keen interest in NT electricity market developments, particularly those related to the transition from existing spinning reserve policies to new ancillary services (unbundling and FCAS) and which impact the implementation and operation of renewable energy projects.

We make the general observation that the draft SSG do not specifically mention variable renewable energy generation and there is an important policy relationship between the themes raised in the SSG and the NT Government's "Roadmap to Renewables" process (a 50% target). That is, the need to balance security concerns with the general policy goal of increasing the penetration of renewable energy.

A particular example of this relates to Alice Springs where our Uterne Power Plant operates, having been commissioned in 2011 and expanded in 2015. We note the reference in Section 7 to "Alice Springs System Security Dispatch Constraints". We understand that this document sets out System Control's current approach to maintenance of spinning reserve within the Alice Springs network. We also understand that this is short term advice which is periodically reviewed and will evolve over time. Epuron has an interest in maximising the output of the Uterne Power Plant (i.e., minimising PWC-directed curtailment events) and would appreciate the opportunity to be consulted as these reviews occur.

Should you have any questions relating to this response, please contact us on (02) 8456-7400.

Sincerely,

Epuron Solar Pty Ltd



Martin Poole
Director