

Generator Performance Standards – Round 2 Consultation Submission

To Market Operator

NT Airports would like to make additional comments for feedback to the draft Generator Performance Standards.

1. Solar Installations spread over multiple buildings and over a wide area, giving inherent diversity to clouding, appear to be negatively impacted by the cost of multiple forecasting systems being required. A relaxation of forecasting accuracy is suggested for mitigation.
2. Seeking clarity relating the suggested cost of battery installation within a solar field and confirmation that the cost of cooling has been included using NT meteorological data.
3. Do not believe the sentiment that all existing solar inverters can be used as battery inverters to be real, nor that this functionality comes at no cost.
4. Does not address installations with embedded loads, particularly sites with large variable loads, in relation to forecasting accuracy and export/import at connection point.
5. It is our understanding that all installations currently grid connected at the time of enactment will be grandfathered with no additional requirements for the life of the plant.
6. It is our understanding that connection applications submitted before the time of enactment will also be grandfathered.
7. Request the publishing of solar forecasting data and approved vendors/systems which were tested during PWC's evaluation of vendors. Additionally, request time to review and evaluate such systems.
8. Seek recognition that the requirement for 39.5% of nameplate active power to be available for reactive power support comes at the cost of active power capability and for a mechanism to be remunerated upon the establishment of a market for such services.

9. Seek a phased approach to the implementation of forecasting for dispatch in both forecast length and accuracy to lessen the compliance burden of such a significant change/rollout.
10. Recognition of different modes of operation for batteries is needed so the functions used for ancillary services can be realised in the electricity market. By classifying a battery as a generator only, this reduces the incentive to invest in the installation of batteries; making solar generator output reductions from forecasting systems more likely. This is counter to the accepted knowledge that more storage on the grid will enhance system security and stability
11. Comments indicating that as technology and the electricity supply system changes it is likely that modifications to the electricity supply standards will occur more frequently, providing opportunity for stakeholder input.
12. Comments indicating sensible negotiation for individual circumstances of connection and technology inclusion, that is not explicitly defined, is welcomed and allowed.