

Ms Jodi Triggs  
Market Operator  
Power and Water Corporation  
DARWIN NT  
c/o [market.operator@powerwater.com.au](mailto:market.operator@powerwater.com.au)

Dear Ms Triggs,

RE: PROPOSED CHANGES TO THE NETWORK TECHNICAL CODE AND SYSTEM CONTROL TECHNICAL CODE IN RESPECT OF DELETION OF SEMI-SCHEDULED AS A CLASSIFICATION AVAILABLE FOR NEW RENEWABLE ENERGY GENERATORS

It is stated on page 12 of the Generator Performance Standards Consultation Paper 18 December 2019 that “references to non-scheduled and semi -scheduled generators have been removed [from Clause 3.3.5.14 of the NTC] as the intention is for all new generators connecting under clause 3.3 to be classified as scheduled”. This is further detailed in the paragraph on page 21 which refers to the planned removal of this classification from the current System Technical Code. The proposed change runs contrary to the National Electricity Rules (NER) V117 where, in clause “S5.2.2.14 Active power control”, it is clearly stated that classifications of semi-scheduled and non-scheduled are permitted.

As Chair of the Expert Panel, which drafted the Roadmap to Renewable Energy Report for Government, I am strongly stating that the provision for semi-scheduled generators should remain for intermittent generation such as solar and wind farms. The proposed change places onerous obligations on renewable generation that may significantly increase the costs of these generators and cause decreased viability. There is not a sound basis to deviate from the NER on this matter now. Such a move would be at odds with the National Electricity Market, the Western Australian Energy Market and NT Government Policy.

Renewable energy power generation is inherently intermittent. Cloud forecasting, ramp-rate control and battery support all mitigate against adverse behaviour of the renewable energy generator on the grid. System stability and reliability does not necessarily require dispatchable active power by all generators.

The report envisioned that market signals could be considered to encourage renewable energy generators to attain dispatchability in the future as technology advances. This ability is neither warranted nor economically attainable today under the present dispatch rules. I-

NTEM, Clause 4.4B (C) of the System Control Technical Code, requires scheduled generators to provide dispatch submissions a day ahead. This is not credible for renewable energy generators. Renewable energy generators can forecast (predict within acceptable error) their production a day ahead but cannot guarantee their dispatch. Based on the NER, dispatch rules should be clearly written to permit reasonable battery and cloud forecasting technology to dispatch active power from large renewable generators.

The Expert Panel specifically recommended [Core Enabling Action 5(a)] that commitment to the NERs be paused to allow full review and ensure that the Rules are drafted to support the Government's renewable energy policy. In Core Enabling Action 5(b) it was recommended that changes to the Rules and Code should not "inhibit the achievement of the 50 per cent target", which this Code change may well do.

Your sincerely,

A handwritten signature in black ink, appearing to be 'AL', with a large, stylized loop at the bottom.

Alan Langworthy  
Past Chair of the Expert Panel  
Roadmap to Renewables Report

January 30 2019