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EDL NGD (NT) Pty Ltd
Submission on System Control Secure System Guidelines

EDL has reviewed the proposed Secure System Guidelines version 3 and welcomes the opportunity to provide the following submission:

Section 5 – Inertia Ancillary Service

EDL notes the intention to introduce an inertia ancillary service and questions the level of consultation on this proposed service. Specifically, EDL is concerned that the introduction of any new ancillary service needs to ensure that end users are not being charged twice for a service that has been historically delivered as an inherent property of the system as a whole.

Any analysis of the requirement for a new service should clearly answer the question as to why the new service is now required (and has not been required historically) and ensure that the introduction of the new service is not simply a transfer of value from one group of users to another. Additionally, if there is a valid requirement for a new ancillary service, then it needs to be clearly understood how that service has been delivered up until now. The value of all participants who are potentially supplying that service should be recognised and those parties should be appropriately rewarded for that service provision.

EDL feels that further consultation is required to ensure all parties are fully educated as to the need for the inertia service and the value that it provides to the system. Additionally, further analysis is required to ensure that all parties who are already contributing to the provision of system inertia receive appropriate recognition under any potential new scheme.

Section 19 – Special Control and Protection Requirements or Schemes

EDL recognises the need for the Pine Creek Power Station (PCPS) to change between droop mode to isochronous control in response to specific isolation events on the Darwin Katherine Transmission System (DKTS). The PCPS does not have visibility of many of these events and necessarily relies upon receipt of appropriate signalling in order to make the required switching.

The draft guidelines state that PCPS receives the signals via microwave communications and pilot wire communications. These signals have historically been unreliable, resulting in system stability issues. The reliability and accuracy of these signals would need to be resolved to ensure PCPS changes from droop to isochronous control as required. In addition, the draft guideline detail that PCPS has separate and independent "Local Isoch" functions whereby circuit elements local to the power station are monitored and also cause a

change to isochronous mode. There is no automatic system installed at PCPS to achieve the required switching. Any change to isochronous mode in response to local circuit elements is manually switched. EDL is open to further discussion with System Control to determine whether the current manual system for "Local Isoch" is the most appropriate, or whether an alternative solution should be developed.

EDL looks forward to further discussion and consultation with System Control on the above issues. EDL is keen to ensure that PCPS operates appropriately within the DKTS, including in response to isolation events and is appropriately recognised for the value of ancillary services that it provides to the system.

Yours Sincerely



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