

To Whom it May Concern,

While aspects of the Network Technical Code have become outdated since its last review in 2013, Power and Water Corporation's proposal requiring fully-scheduled status of renewable projects under the Generator Performance Standards (GPS) review process will make it very challenging for current and future large-scale solar farms to connect to the grid.

PWC's proposed GPS changes would make it far more onerous for the NT to connect renewables than the east coast and Western Australian markets. In particular, the requirement that variable large scale solar (more than 2MW) must be fully dispatchable is impractical and anti-competitive. Currently, all other jurisdictions accept that solar energy is semi-scheduled, rather than fully-scheduled. The new requirements proposed will affect the existing 45MW of large scale solar announced for Katherine, Batchelor and Manton Dam, and plans for around 100MW of new solar currently being processed. There's a high chance this will deter investment for Renewable Energy in the Territory, right when the industry and needs it most.

Climate Change has been described as an existential threat to humanity by the Secretary General of the United Nations. It is of critical importance that the Northern Territory Government acts to reduce net and per capita NT emissions, at least to net zero by 2050. In the current absence of NTG scrutiny as to PWC compliance with the NTG's forthcoming Climate Strategy, it is in PWC's interest to ensure that its strategies and actions radically reduce energy sector emissions. Instead, this PWC proposal would help to ensure that the NT's per capita emissions will become the highest in the world.

As you are aware, the renewables industry is currently considering large, game-changing generation projects in the Territory. Storage capacity for large-scale solar PV is both currently adequate and improving in terms of functionality and cost. PWC's proposal to require full-scheduling on these projects will serve no purpose but to create a significant disincentive for investment and to act as a brake on the modernisation and diversification of the Territory power supply.

Yours Sincerely,

Cath McLeish, David Liddard and Elissa Shuey
Climate Action Darwin



www.climateactiondarwin.org.au

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