

# Scheduling and Dispatch Procedure Development

Participant Response Template

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# Contents

<b>1</b>	<b>Context .....</b>	<b>3</b>
<b>2</b>	<b>Participant comments .....</b>	<b>3</b>
2.1	Procedural evolution .....	3
2.2	Pre-dispatch processes .....	4
2.3	First off decommitment merit order (post 1800 hours) .....	5
2.4	Pre-dispatch solution process.....	6
2.5	Real-time commitment and dispatch.....	7
2.6	Market prices – I-NTEM .....	8
2.7	Market timetable procedure .....	9
2.8	Generator forecast compliance procedure .....	10
2.9	Generator offer procedure .....	11
2.10	Generator unit tie break procedure.....	12
2.11	System Control plant outage procedure .....	13
2.12	Dispatch and pricing procedure .....	14

# 1 Context

This template is to assist stakeholders in giving feedback about the changes detailed in the scheduling and dispatch procedure development discussion paper.

## 2 Participant comments

### 2.1 Procedural evolution

**Participant Question 1:** What are your views on consolidating some or all of the existing procedures into a single procedure / reference guide governing the scheduling and dispatch of System Participant Facilities? Which procedures should be consolidated into a single procedure, and which (if any) should not?

Please provide clear rationale for not including any of the existing procedures into a single consolidated procedure.

**What are your views on consolidating some or all of the existing procedures into a single procedure / reference guide governing the scheduling and dispatch of System Participant Facilities?**

As a participant, Eni sees merit in consolidating some of the existing procedures into a single procedure /reference guide governing the scheduling and dispatch of System Participant Facilities.

**Which procedures should be consolidated into a single procedure, and which (if any) should not?**

The following could be consolidated into a single procedure:

- Market Timetable Procedure
- Generator Offer Procedure
- Generator Unit Tie Break Procedure
- Dispatch and Pricing Procedure Draft

The following should not be consolidated into a single procedure and should remain separate:

- Generator Forecast Compliance Procedure
- System Control Plant Outage Procedure

**Please provide clear rationale for not including any of the existing procedures into a single consolidated procedure.**

- Generator Forecast Compliance Procedure: does not apply to all generators. Eni would like to understand if this will be replaced with SFURM methodology/procedure. If so, will the Network Technical Code be revised accordingly?
- System Control Plant Outage Procedure: plant outage procedure includes both generators and transmission network assets (transmission lines, substations, transformers).

## 2.2 Pre-dispatch processes

**Participant Question 2:** Do you support amending the Generating Unit Tie Break Procedure to more accurately reflect the current operational practice of proportional energy dispatch process?

Eni is supportive of a proportional dispatch in tie break situations, mostly because it is a much simpler methodology while retaining fairness. Proportionality should be based on capacity being offered by the generators with the same offered price. Therefore, Eni supports amending the procedure to reflect this principle.

## 2.3 First off decommitment merit order (post 1800 hours)

**Participant Question 3:** Do you have any material observations and recommendations regarding the decommitment merit order post 1800 hours?

Please provide clear rationale for your recommendations.

The decommitment merit order post 1800 hours predominantly considers dispatch of thermal generating units, referencing fast start generating units and self committed unit operating at minimum load, and does not appear to take into consideration the application of Battery Energy Storage Systems (BESS) as generating units forming part of the decommitment merit order post 1800 hours.

Recommendation is for BESS to be included, and clarification provided as to whether BESS are classified as a fast start generating unit. It is not clear how System Control would intend to use a fully charged BESS as part of the decommitment merit order post 1800 hours.

## 2.4 Pre-dispatch solution process

**Participant Question 4:** Do you have any material observations and recommendations regarding the scheduling / pre-dispatch process?

Please provide clear rationale for your recommendations.

Long Term Risk Notices and non-reliability notices are not regularly taken into account in the pre-dispatch instruction. It is recommended that the pre-dispatch schedule account for any long-term network constraints and any planned outages of the generator itself. Otherwise, the generator receives a pre-dispatch schedule that can't align with the actual dispatch instructions issued in real time. For instance, if the generator is not allowed output above a set level due to existing network constraints, this should be reflected in the schedule.

## 2.5 Real-time commitment and dispatch

**Participant Question 5:** Do you have any material observations and recommendations regarding the real-time scheduling and dispatch process?

Please provide clear rationale for your recommendations.

The real-time scheduling and dispatch process highlights “Priority 1 – Security Constraints” and “Priority 2 - Economic Commitment and Dispatch Arrangements” however it is not clear or transparent to system participants at which load level does Priority 2 - Economic Commitment and Dispatch Arrangements commence.

For example, for a network load of 120 MW, generators supplying system security and essential system service requirements could be generating 90 MW, leaving only 30 MW demand to be served by remaining generators under economic dispatch. If this information was made available, remaining generators would understand they are being curtailed or ramped down to zero, assuming no other network events have taken place.

To improve transparency, it is recommended to specify what capacity and which generators fall into Priority 1, and which fall into Priority 2

Further, current operating practices don’t address concerns regarding transparency in curtailment, including allocation of such curtailment.

Lastly, NTESMO should adopt a suitable tool or platform to better support renewable integration allowing their maximum dispatch, thereby reducing electricity costs for Territorians.

## 2.6 Market prices – I-NTEM

**Participant Question 6:** Do you have any material observations and recommendations regarding the market price determination process?

Please provide clear rationale for your recommendations.

Eni has no comment on Question 6



## 2.7 Market timetable procedure

**Participant Question 7:** What amendments would you recommend to the existing market timetable as described in the Market Timetable Procedure?

Please provide clear rationale for recommending such changes.

For transparency and ease of reference, the Market Timetable Procedure could include the period for publication of the preliminary, final and 13-week settlement statements to generators.

## 2.8 Generator forecast compliance procedure

**Participant Question 8:** What amendments would you recommend to the existing generator forecast compliance procedure based upon current negotiated access? Please provide clear rationale for recommending such changes. Do you support consolidation of the generator forecast compliance procedure into the proposed scheduling and dispatch procedure?

If not, please provide a clear rationale for an alternative approach.

**What amendments would you recommend to the existing generator forecast compliance procedure based upon current negotiated access? Please provide clear rationale for recommending such changes.**

In Eni's view the requirements of clause 3.3.5.17 of the NTC, to which the generator compliance procedure refers, are impossible to implement in a commercially sound way, also due to the unavailability of technologies with the accuracy that such clause requires. A negotiated access has not yet been achieved but it is expected to deviate significantly from the automatic access. Eni understands that NTESMO is considering a different approach (SFURM), and Eni has provided its feedback to the proposal (and supports efforts in this direction). It follows that the compliance procedures will need to be significantly amended once a new forecasting and firming policy is defined, however it is premature to do so.

As per feedback provided to the SFURM team, in Eni's view NTESMO should configure the network so that renewable generators are allowed to export at their full potential, which should ultimately result in a lowering of the cost of electricity on the I-NTEM.

**Do you support consolidation of the generator forecast compliance procedure into the proposed scheduling and dispatch procedure? If not, please provide a clear rationale for an alternative approach.**

No, since there will likely be substantial changes to the underlying code requirements in the future

## 2.9 Generator offer procedure

**Participant Question 9:** What amendments would you recommend to the existing generator offer procedure based upon prevailing market conditions?

Please provide clear rationale for recommending such changes.

The generator offer procedure and template should be updated for inverter-based solar generators and BESS generators as current instructions consider thermal generation only.

## 2.10 Generator unit tie break procedure

**Participant Question 10:** What amendments would you recommend to the generator unit tie break procedure based upon prevailing market conditions? Please provide clear rationale for requiring such changes.

Do you support centralised dispatch of all generating units to afford incremental proportioning of dispatch?

Can you recommend any alternative methods to be considered? Please present clear rationale for such.

**What amendments would you recommend to the generator unit tie break procedure based upon prevailing market conditions? Please provide clear rationale for requiring such changes.**

Eni doesn't have specific recommendations on how to draft the amendments, noting only that Eni favours simplicity. As per the response to Question 2; Eni supports amending the Generating Unit Tie Break Procedure to reflect the current operational practice of proportional energy dispatch process

**Do you support centralised dispatch of all generating units to afford incremental proportioning of dispatch?**

Yes, if done so transparently when generating units have an equal offered price.

**Can you recommend any alternative methods to be considered? Please present clear rationale for such.**

As stated above, Eni favours the simple proportional approach.

NTESMO may also wish to consider and evaluate, if it hasn't already, the approaches currently being implemented in the Wholesale Electricity Market (WEM) in Western Australia. The WEM reforms have placed strong emphasis on system security while reducing unnecessary and higher cost commitments, and some of these design features may offer useful insights.

## 2.11 System Control plant outage procedure

**Participant Question 11:** What amendments, if any, would you recommend to the existing System Control plant outage procedure based upon prevailing market conditions?

Please provide clear rationale for recommending such changes.

In Eni's view, the current version of the System Control plant outage procedure is effective, and Eni appreciates the current timely flow of information

# 2.12 Dispatch and pricing procedure

**Participant Question 12:** Do you support the consolidation of the draft dispatch and pricing procedure into the proposed scheduling and dispatch procedure?

Please provide clear rationale for any alternative approaches proposed.

Eni remains neutral on this topic

Scheduling and Dispatch Procedure Development

## Contact

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**NTESMO**