

Monday, 8 December 2025

Mr Simon Middleton
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Power and Water Corporation
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By email to: Simon.Middleton@powerwater.com.au; market.operator@powerwater.com.au

Dear Simon,

**SUBJECT: CONSULTATION RESPONSE: NTESMO SCHEDULING AND DISPATCH
PROCEDURE DEVELOPMENT**

Rimfire Energy ("Rimfire") appreciates the opportunity to contribute to the consultation request in relation to Power and Water Corporation's ("PWC") proposal to update the I-NTEM Dispatch and Pricing Procedure.

As a broad principle, Rimfire supports reform that strengthens competition, improves system reliability, and encourages private sector investment. NT's growth demands a reliable and competitive energy market. The only long-term internationally universal and consistent basis for stable, reliable and competitive electricity is through a well-designed market, with equal, fair and open access to the private and public sector. Without such a market, innovation and growth will be limited and the NT will not reach its potential.

More specifically, in relation to this consultation, Rimfire's understanding is that the majority of the changes proposed are related to current practice or incremental improvement to current practice. Again, Rimfire reaffirms its support for change to procedures where there is a clear rationale, supports a level playing field and promotes competition amongst participants.

In relation to the Territory Electricity Market ("TEM") Reform program, as detailed in section 1.4, it should be recognised that the:

- TEM Reforms are not finalised or mature and hence any changes required to Scheduling and Dispatch procedures are not known at this time, and consequently it must be recognised that further consultation will need to happen once the TEM Reform is finalised; and
- proposed implementation of a Public Procurement Model ("PPM"), which is indicated to come "into effect over the next few years", has raised significant concerns for Rimfire and other industry participants based on previous consultations. There are substantial reservations regarding the anti-competitive implications and other aspects of the model. The consultation suggests that the adoption of this model is a fait accompli; however, Rimfire does not accept

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this position and expects continued discussions and further consultations with the TEM Reform team.

Outlined below are Rimfire's responses to the specific questions detailed in the participant response template of the consultation paper:

Question 1

Rimfire is supportive of the procedures being consolidated into a single guide, provided there is clear process such that individual procedures can be updated (without loss of productivity for the market and its participants) in the future based on adequate notice and consultation with industry.

Question 2

Rimfire supports changing the tie break procedure to align with current practice of proportional energy dispatch.

Question 3

While it is recognised that a decommitment merit order submission provides flexibility to some generators (principally Territory Generation), it is also recognised that the TEM is small and hence there is a need to reduce unnecessary regulatory burden and the associated costs. Further consideration should therefore be given to whether this procedure actually adds more benefit than costs; and a preference to minimise unnecessary procedures may result in this being removed.

Section 4.8.2 – Frame 6 units. The Secure System Guidelines ("SSG") v5 specifies the system requirements, rather than specific units like Territory Generation's Frame 6 units. Specific unit requirements are dealt with in the Risk Notices ("RNs"). Rimfire supports this approach and suggests this section is therefore no longer relevant to this consultation.

Section 4.9 – Pre dispatch solution process – Minimum stable loads. Setting of minimum stable loads for Generators is a significant factor in the operation of the Darwin-Katherine Electricity System ("DKES"). Lower specified minimum stable loads would allow greater flexibility and more sustainable generation. There should be consideration of some form of incentive and/or regulation for Generators to set their lowest possible minimum stable load. Related, the period of stability should be defined, and a sensible time limit set such as stable for the trading day (24 hours). Without conditions on setting of minimum stable load this could lead to a misuse of market power and potential crowding out of more economic sources of generation.

Section 4.9 – Pre dispatch solution process. The statement "With the foreshadowed introduction of the PPM, this situation will not occur" requires further explanation, noting Rimfire's prior comments in relation to the PPM.

Question 4

The NT DKES is a relatively small market (<400MW) and hence the amount of regulation should be kept to an absolute minimum to reduce the cost to NTESMO, NT electricity consumers and the NT economy. In this context, Rimfire makes the following comments:

- i. Self-committed does not apply to embedded generation under 2 MVA, as these units do not participate in the market. This category is relevant to large generators, which are typically

- dispatched by the Power System Controller. Further consideration should be given to whether this category can be eliminated to reduce regulatory burden.
- ii. Fast start classification is useful, however the System Control Technical Code (“SCTC”) lacks a clear definition here and should be addressed. For example, defining fast start as a generator that can ramp from cold to full output in 10 minutes. Clear definitions will assist generation proponents when assessing and deploying investment in DKES connected generation.
 - iii. Section 5.2.1 – The term ‘unreliable’ in the statement “Therefore, in the event that a unit has recently been unreliable when starting, the next unit in the merit order may be dispatched first” is undefined and subjective. Clearly defining ‘unreliable’ would offer guidance and ensure procedural fairness.

Question 5

In general, the above comments on pre-dispatch, should also be considered for real time dispatch, and hence are not repeated here.

Question 6

No material objections at this time to the market price determination process.

Question 7

No comments.

Question 8

This section is very brief on the Forecast Compliance Procedure. In addition, it is noted that the Network Technical Code (“NTC”) v4 is currently undergoing review, which includes section 3.3.5.17 which underpins this procedure. This review process should be undertaken first, and then NTESMO’s views on changes to this procedure should be provided for consultation.

Question 9

Limited changes should be made now to the Generator Offer Procedure, but further changes should be proposed for consultation once the details of the TEM and Territory Dispatch Engine (“TDE”) are known.

Question 10

Rimfire is supportive of the proportional energy dispatch approach which will bring the TEM in line with other Australian markets.

Question 11

The System Control Plant Outage Procedure (“SCPOO”) requires Outage and Test Requests (“OTRs”) at least 10 business days in advance, however this is often impractical and represents a significant opportunity for improvement, especially for R2 testing where scheduling depends on PWC & PSC reviews. This causes delays and inefficiencies. R2 Testing should have separate criteria and processes, decided through additional consultation.

Question 12

As per previous responses above.

Finally, Rimfire acknowledges the engagement process undertaken by NTESMO to inform its proposals and the ongoing effort to incorporate the long-term interest of NT electricity consumers in their forward planning.

Rimfire looks forward to participating in further NTESMO consultations.

Kind regards,

Kim Howlett

Kim Howlett

Chief Operating Officer

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