



Our Ref.: REN.LT.8775.PWC.SR

16 January 2026

Power and Water Corporation, Northern Territory Government

Dear Power and Water Corporation,

Eni Plenitude Renewables Australia Pty Ltd (**Plenitude**) would like to thank Power and Water Corporation (**PWC**) for the invitation to provide feedback on the FY2028–32 System Control and Market Operator Charges Review (“Consultation Paper”) which will assist with the development of Northern Territory Electricity System Market Operator (NTESMO) Regulatory Proposal for the next regulatory period commencing on 1 July 2027.

Plenitude provides the following feedback on the two questions of section 4 – Performance Incentives in the Consultation Paper.

Section	Consultation Question	Plenitude Response
Performance Incentives	7. Do you agree with the KPIs we propose to monitor, the indicative targets, and the number of KPIs proposed?	Plenitude supports the proposed KPIs, particularly those relating to forecast accuracy and secure system operations.  The Market Operator indicative targets appear reasonable to Plenitude.
	8. Are there any further KPIs you see value in being included in the performance incentive framework?	Yes, we recommend including as a minimum one KPI to monitor NTESMO’s effectiveness in integrating renewable energy generators, which offer affordable electricity, as detailed in Annex 1.  Furthermore, two additional KPIs should be considered in relation to new generators’ connection time:  <ol style="list-style-type: none"><li>1. time from formal commitment to connect a new generator to full readiness of the point of connection for the new generator’s energisation – 120 days;</li><li>2. time from start of network compliance testing to achieving full compliance of a new generator in accordance with the Network Technical Code – 120 days</li></ol>

Kind regards

Eni Plenitude Renewables Australia Pty Ltd

**Eni Plenitude Renewables Australia Pty Ltd**

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## Annex 1

Function	KPI	Measurement	Indicative Target	Rationale
System control	Renewable power curtailment rate	<p>Percentage of available renewable power curtailed for any reason.</p> <p>Calculated as: aggregate difference between dispatch instructions and firm offers, if positive, divided by the aggregate firm offers</p>	<5% annually	This KPI incentivises NTESMO to minimise curtailments of solar generation, indirectly maximising economic and environmental benefits and supporting renewable electricity integration.