NORTHERN TERRITORY TREASURY SUBMISSION TO THE UTILITIES COMMISSSION ON THE DRAFT ELECTRICITY RETAIL SUPPLY CODE FOR THE NORTHERN TERRITORY

Northern Territory Treasury thanks the Utilities Commission for the opportunity to review the Draft Electricity Retail Supply Code (Code) for the Northern Territory and recognises that the proposed draft Code has drawn on its initial work and the feedback on the initial consultation process.

Treasury supports in-principle the Code as drafted, however it has outlined some minor amendments and clarification in some areas summarised in the table below:

Clause	
3	Prudential Requirements General – 3.21 of the Consultation Paper refers to the ability for the retailers, network providers and generators to negotiate and agree alternative prudential arrangements, however there does not appear to be any provision to do this is in the draft Code. Having said that, given the Code is to set out the obligations of industry participants Treasury believes that the credit support arrangements governing retailers need to be consistent and does not consider that participants should be able to negotiate alternative arrangements that may favour one retailer over another.
3.2.2 (b)	While we acknowledge the alignment with the NECF framework, Treasury is of the view that the reintroduction of a minimum level of credit support be considered.
3.4 (c)	If the retailer opts to provide cash as its credit support does the deposit accrue interest and if so at what rate?
5.1.5	New Clause While Treasury acknowledges PWC's system constraints and that it is only able to currently churn customers with an interval metre, this does provide a barrier to FRC. Treasury recommends provision needs to be made for all customers to request the installation of an interval meter to allow for a transfer to another retailer. Furthermore this would be consistent with clauses 7.1.3 (d); 8.2.4 (c); 8.2.10 (c); and 8.2.11 of the Code
7.1.1	Will the service order procedures prescribe penalties if in the event the network provider does not meet its obligations
10.1.8 10.1.10 10.1.11	What are the rules of natural justice?
10.2.1	Amend Utilities Commission Act to Act (as defined)
10.2.2	When is the Commission formally appointed, prior reference is only referred to the Commission 10.1.4
Throughout	Defined terms are always in bold