Integrating Price Responsive Resources into the NEM (IPRR)



Final High Level Implementation Assessment (HLIA) Industry Forum

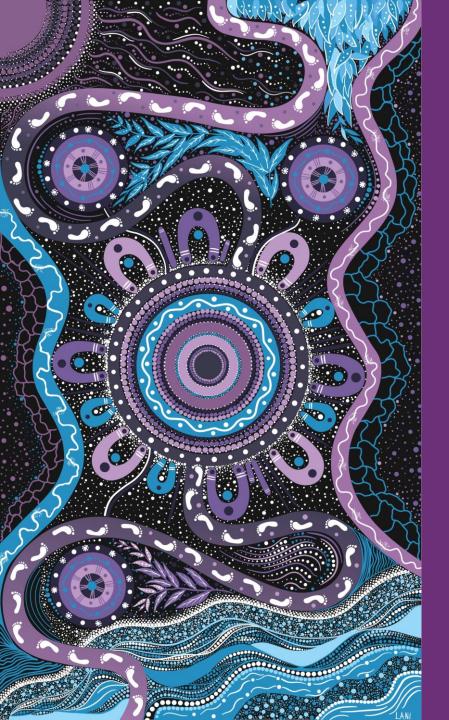
13 February 2025





1. Welcome & context

Ulrika Lindholm (AEMO)





We acknowledge the Traditional Custodians of the land, seas and waters across Australia. We honour the wisdom of Aboriginal and Torres Strait Islander Elders past and present and embrace future generations.

We acknowledge that, wherever we work, we do so on Aboriginal and Torres Strait Islander lands. We pay respect to the world's oldest continuing culture and First Nations peoples' deep and continuing connection to Country; and hope that our work can benefit both people and Country.

'Journey of unity: AEMO's Reconciliation Path' by Lani Balzan

AEMO Group is proud to have delivered its first Reconciliation Action Plan in May 2024. 'Journey of unity: AEMO's Reconciliation Path' was created by Wiradjuri artist Lani Balzan to visually narrate our ongoing journey towards reconciliation - a collaborative endeavour that honours First Nations cultures, fosters mutual understanding, and paves the way for a brighter, more inclusive future.







1. Please mute your microphone.



- 2. We look forward to your feedback and questions. Use the 'Q&A' function to ask any questions or comments throughout the session.
 - AEMO SMEs are on the call, who will attempt to respond in the chat.
- 3. Key questions or comments will be addressed verbally in dedicated Q&A sections.
- 4. In attending this meeting, you are expected to:
 - Contribute constructively.
 - Be respectful, both on the call and in the chat.



Participants are asked to familiarise themselves with AEMO's <u>Competition Law Meeting Protocol</u> as outlined in Appendix A and at AEMO's website.

NEM Reform Program is enabling the energy transition

The most significant modernisation of the NEM since 1998

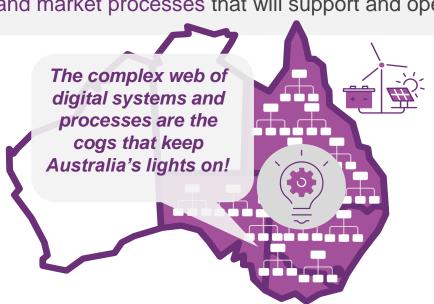


The energy transition and NEM Reform

Australia's National Electricity Market (NEM) is transitioning from coal generation to a future driven by renewables. NEM Reform is needed to modernise the digital systems and market processes that will support and operate the future system.

The need for reform is urgent

- The NEM's systems and processes were built to support (synchronous) coal powered generation.
- Uplift must occur to support more renewable energy generation and storage types.
- Systems must be made more secure.





Program outcomes

AEMO's systems and processes are capable of transitioning Australia to net zero



More renewable energy will reach consumers



Increased safety and security of the power system



Increased efficiencies for energy participants



More investment in renewable infrastructure

Implementation Roadmap

AEMO published v.5 of the Roadmap and supporting artefacts 31 October 2024

- The <u>NEM Reform Implementation Roadmap</u> (the Roadmap) establishes a
 basis upon which AEMO, and stakeholders may navigate the breadth of
 reforms (including ESB Post-2025 reforms) over the coming years, de-risking
 delivery, minimising implementation costs and informing regulatory and policy
 timing
- It is a key output from our collaboration with the Reform Delivery Committee (RDC)
- The **objective** of the Roadmap is to set out a Program that:
 - Implements reforms in a timely and efficient manner
 - Co-ordinates regulatory and IT change
 - Aims to remove costs associated with implementation of individual initiatives
 - Provides transparency to stakeholders on the implementation program
 - Supports participant readiness
 - Provides a basis for understanding implementation & deliverability challenges.
- Over time the Roadmap has been expanded to include gas reform initiatives provide an overall integrated view for participants in both markets



NEM Reform Program Engagement



Forums	Forum focus		Approach
Executive Forum	Program overview and status update	3 per Year	Nomination
Reform Delivery Committee (RDC)	Long term implementation planning perspective	Quarterly	Nomination
Program Consultative Forum (PCF)	Inflight initiatives status & co-ordination	Monthly	Open
Implementation Forum	Implementation of reforms	Monthly	Open
Electricity Wholesale (EWCF) & Electricity Retail (ERCF) Consultat	Procedures working groups	Monthly	Open
Industry Testing Working Group	Testing	Monthly	Open
Working Groups	Inflight	As appropriate	As appropriate

AEMO facilitates overarching coordination across reform initiatives as well as support affected stakeholders in each reform phase from implementation design, solution delivery and through to industry testing.



To learn more, please visit:

- AEMO | NEM Reform Program Forums
- AEMO | NEM Reform Program Initiatives
- AEMO | Industry Meetings Calendar
- or contact the program at NEMReform@aemo.com.au.

Focus / working groups for inflight initiatives include:

Initiative working groups

Market Integration Technology Enhancement WG (IDX/IDAM/PC)

Industry Testing Working Group (ITWG) – IT technical implementations

Subscribe to the NEM Reform Newsletter here



Objectives of today's session

This session will discuss the reform Integrating Price Responsive Resources into the **NEM (IPRR)**



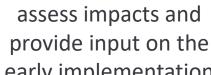
Introduce final policy and rationale

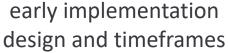




AEMO's IPRR final High Level Implementation Assessment was published for comment on 6 February 2025, and is available at AEMO's website.







Enable affected

participants to







Refresher: Energy market body roles

Market body roles



Australian Energy Market Commission

Rule maker, market developer and expert adviser to governments

Protects consumers and achieves the right trade-off between cost, reliability and security.



Australian Energy Regulator

Economic regulation and rules compliance

Polices the system and monitors the market.



Australian Energy Market Operator

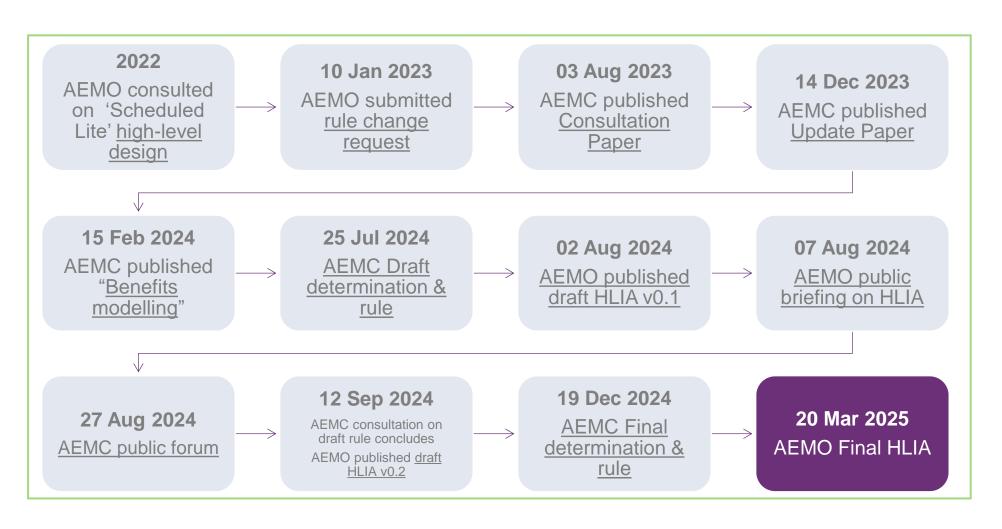
Electricity and gas systems and market operator

Works with industry to keep the lights on.

Source: AEMC – National energy governance

IPRR process to date





The IPRR high-level implementation assessment (HLIA) provides an indicative and preliminary view to participants on how the IPRR rule may be implemented by AEMO.

For more information visit:





Agenda



#	Time (AEDT)	Topic	Presenters	
1	2:00-2:10pm	Welcome & context	Ulrika Lindholm (AEMO)	
2	2:10-2:40pm	Overview of the IPRR final rulePolicy rationale and designQ&A	Rachel Thomas (AEMC)	
3	2:40-2:55pm	AEMO's proposed IPRR implementation approach • Implementation milestones	Emily Brodie (AEMO)	
4	2:55-3:30pm	 IPRR High level implementation assessment: Impacts to AEMO's processes Impacts to AEMO's procedures Impacts to AEMO's systems Participant impact 	Emily Brodie Nicole Nsair Luke Barlow Greg Minney (AEMO)	
5	3:30-3:35pm	Feedback and next steps	Ulrika Lindholm (AEMO)	
6	3:35-3:55pm	Q&A	Ulrika Lindholm (AEMO)	
7	3:55-4:00PM	How to get involved & close	Ulrika Lindholm (AEMO)	
Proroading				

Prereading:

- AEMC final rule
- AEMO final high level implementation assessment

Appendix A	AEMO Competition Law - meeting protocol
Appendix B	Glossary





2. Overview of IPRR final rule

Rachel Thomas (AEMC)

AEMC presentation

AEMC

Integrating price-responsive resources into the NEM

Rachel Thomas — Senior Adviser, Consumers markets and analytics

Agenda

This presentation covers three main parts of the rule change:

- 1. Background
- 2. Solutions in the final rule
- 3. Rules implementation timelines



Background

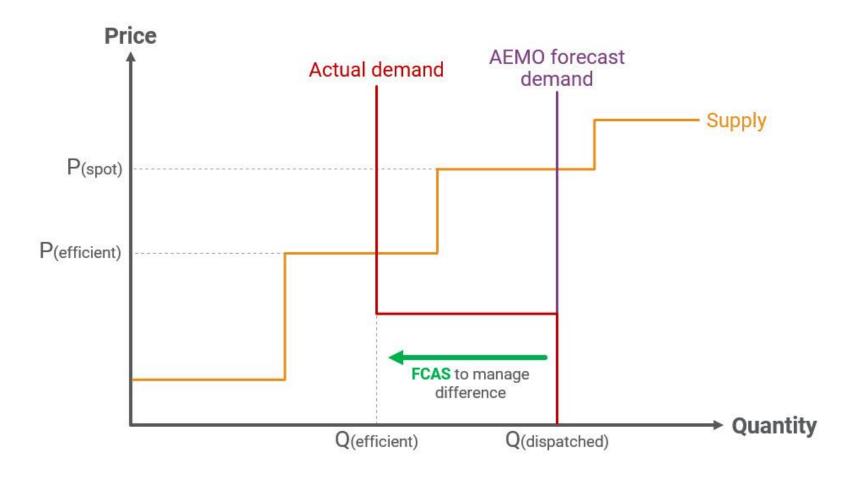
Problem

Unscheduled price-responsive resources, and their response to market price signals, are not integrated into the NEM's planning and operation functions. They are not visible to AEMO or the market and therefore cannot be appropriately considered when determining:

- how much energy demand needs to be met
- how to meet this demand
- the spot price
- when to intervene in the market.

They are also unable to participate in some services that are available to scheduled resource, such as regulation frequency control ancillary services (FCAS), limiting the value that customers can receive for their consumer energy resources (CER).

Existing arrangements don't integrate these resources, resulting in inefficiencies and costs



For example:

- Small distributed resources cannot participate in central dispatch easily (therefore can't access the full market, e.g. can't provide regulation FCAS)
- Price is not an input into demand forecasting

Resulting in:

- Higher spot prices (P(s))
- Higher generation costs
- Potentially use of higher emitting generation
- To balance the system, increased use of FCAS and potentially emergency reliability measures

Over time these inefficiencies may lead to additional market entry, at a material cost.



Solutions

Three areas in the final rule

1

Small distributed resources cannot participate in central dispatch easily

- New voluntary framework to allow resources to participate known as 'dispatch mode' voluntarily scheduled resource (VSR)
- The draft rule has been designed so that participation's practical requirements will be less onerous and more flexible than those of a fully scheduled resource.

2

Being scheduled does not provide the scheduled participant with benefits

• A new time-limited incentive mechanism for up to \$50m (with potential top-ups from external bodies).

3

Price sensitivity is not currently used by AEMO as an input for demand forecasting

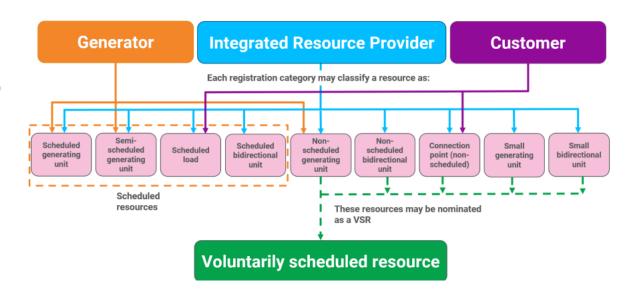
- Monitoring and reporting by the AER and AEMO to:
 - understand the impact of unscheduled price-responsive resources on demand forecasting
 - increase transparency on the actions AEMO takes to improve forecasting.

Dispatch mode

'Dispatch mode', a framework that allows for currently unscheduled price-responsive resources to voluntarily be scheduled and dispatchable, either in aggregations or individually. Including these resources in dispatch means AEMO doesn't need to forecast their actions, reducing demand forecast errors and their consequential inefficiencies.

The key features of dispatch mode are that it:

- is a voluntary mechanism
- allows resources to be nominated as a voluntarily scheduled resource (VSR) and aggregated together to participate in dispatch as one unit
- defines the key requirements for participation in the NER, with AEMO establishing the specific operational and technical details for participants through a new guideline
- provides greater flexibility for participants than existing scheduling requirements, with the creation of deactivation and hibernation modes.



Implementing and operating dispatch mode – guiding principles

The rule sets out principles to guide AEMO in determining the operational and technical details of participation within its guidelines.

This explicitly recognises that VSRs are not the same as large scheduled generators and BDUs, and therefore should not face the same requirements. We consider that this is important to reflect that Market participants are still learning and developing their capabilities to control aggregated CER and should be given time to develop these capabilities. In the early years, the small size of each VSR participating means they are unlikely to have a material impact on power system security and therefore leniency comes at a low risk.

Principles:

- (1) must balance costs of participation for voluntarily scheduled resources in central dispatch with AEMO's costs for facilitating participation by voluntarily scheduled resources in central dispatch;
- (2) must facilitate ease of participation in central dispatch for voluntarily scheduled resources;
- (3) may apply restrictions on voluntarily scheduled resources in central dispatch only to the extent reasonably necessary for AEMO to manage power system security and reliability; and
- (4) may have regard to any other matter determined by AEMO, acting reasonably, and which AEMO must specify in the voluntarily scheduled resource guidelines.

Incentive mechanism

The incentive mechanism's objective is to increase dispatch mode participation in the long run, at the lowest cost.

AEMO will operate the tender mechanism. AEMO must run at least two tenders between 1 April 2026 to 31 December 2031.

AEMO are required to will develop procedures by December 2026, or before the date on which AEMO holds the first VSR tender process.

Benefit to customers will be ensured by having a **price cap for each tender**. The price cap would be less than \$/MW of the market benefit an additional MW is expected to generate.

Only the **resources** below the price cap may receive incentive payments, resources will only be eligible for one incentive agreement.

The rules set a **total payment cap** on the amount that could be paid out over the incentive period at **\$50m**. Additional or alternative funding from external funding sources can be used to replace or top up this \$50m cap.

The costs of payments under successful contracts would be recovered via market customer charges, similar to RERT activation fees.

AEMO will publish a report annually and at the end of the incentive period.

Monitoring and reporting

	AEMO	AER
Purpose	 To identify the presence and issues created by increased unscheduled price-responsive resources. To share the extent to which AEMO can make improvements to its demand forecasting to account for unscheduled price-responsive resources. 	 To estimate the efficiency implications and costs associated with these issues and for the AER make recommendations if market changes are needed.
Topics that must be considered	 Summary statistics to identify trends with DER uptake and price-responsive contracts. Deviations between regional demand forecasts and actual outcomes, and the contribution of unscheduled price-responsive resources to these deviations. Analysis to identify the contribution of deviations from forecast demand to ancillary services costs using frequency performance payments. The extent to which accounting for unscheduled price-responsive resources has helped or hindered demand forecasting in operational timeframes. 	 Inefficient spot prices as a result of regional demand forecast deviations from unscheduled price-responsive resources. Inefficient costs incurred by scheduled market participants as a result of regional demand forecast deviations. Increased market ancillary service requirements as a result of regional demand forecast deviations Increased emissions as a result of inefficient generation. RERT use and associated costs as a result of inefficient generation use.
Frequency	Quarterly statistics and annual report	Annual report

Draft to Final changes

The most important of the changes between draft and final determinations are:

Dispatch mode:

- Increased the flexibility of the opt-out mechanisms. In particular, we removed the restriction on the maximum length of time the deactivation framework applies (previously being seven days).
- Introduced a requirement on distribution network service providers (DNSPs) to consult with VSRPs when designing flexible export limits (FELs).
- Delayed the commencement from Nov 2026 to May 2027

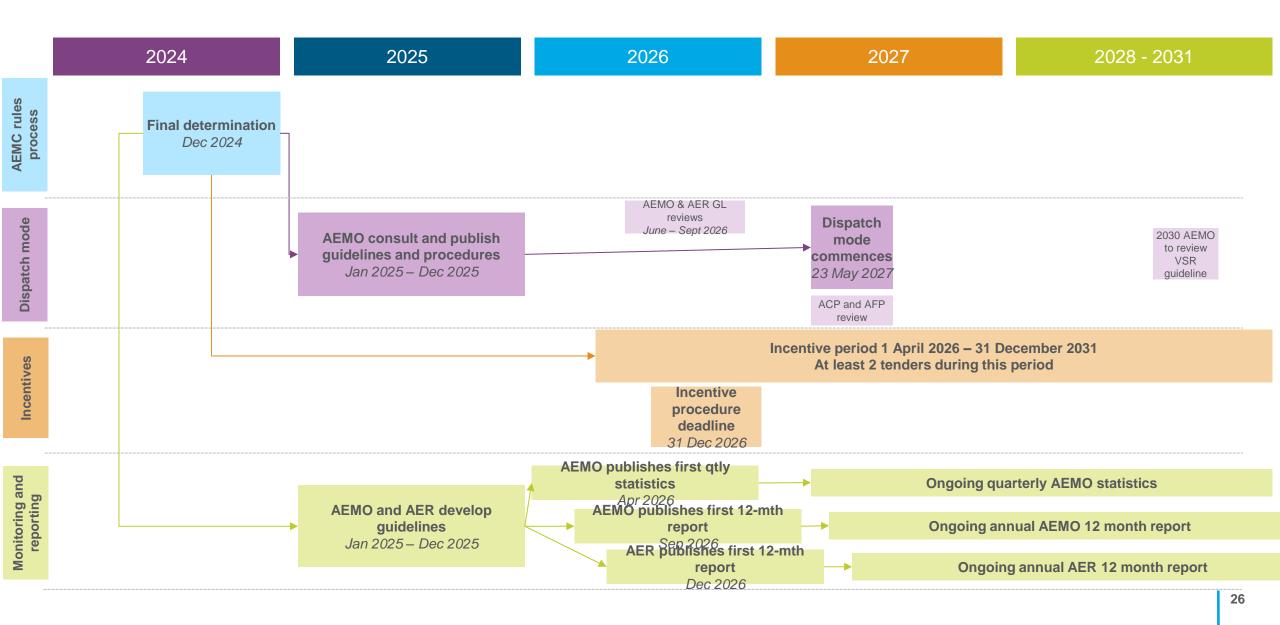
Incentive mechanism:

- Brought forward the commencement date of the incentive mechanism from January 2027 to April 2026
- Increased the per MW payment cap from fifty to a hundred per cent of the estimated benefits.
- Introduced the ability for governments to add additional funds to the mechanism to provide more than \$50m.



Rules implementation timeline

Rules implementation timelines



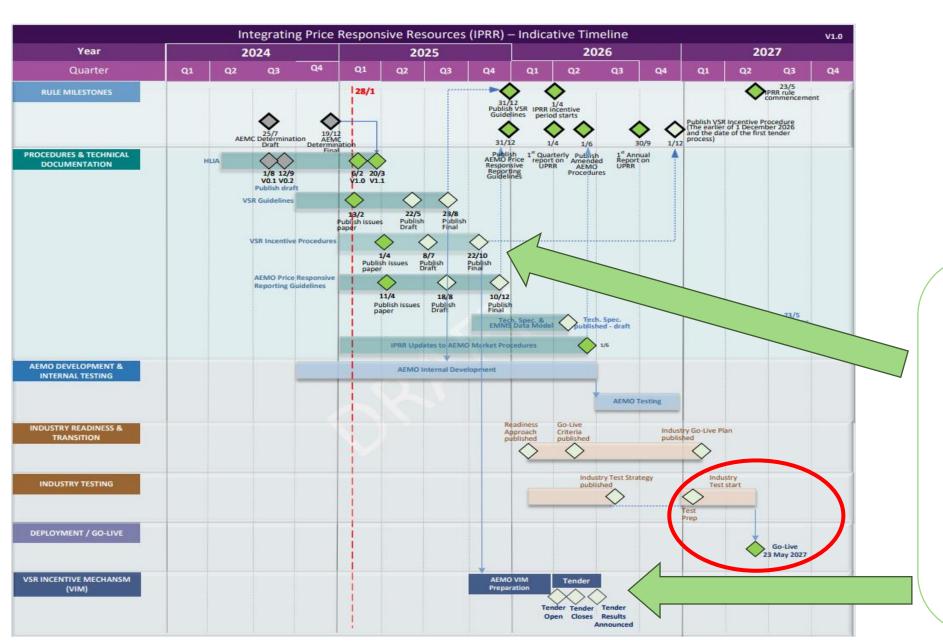


3. AEMO's proposed IPRR implementation approach

Emily Brodie (AEMO)

IPRR indicative implementation timeline





Proposed implementation approach

Adapted to dates in final rule.

Develop VIM procedure earlier than required so that:

- PARTICIPANTS can have early certainty of payments and can develop their systems / processes in time for industry testing and the start of dispatch mode.
- AEMO can manage the VIM dependency to Settlements system development.





- Provides an indicative and preliminary view to participants on how the IPRR rule may be implemented by AEMO and its high-level impacts to:
 - AEMO's processes
 - Market procedures
 - High level system and data exchange
 - Participant activities
- Enable stakeholders to provide input on the early implementation design and timeframes, including whether AEMO's HLIA is consistent with the final IPRR rule.
- Intended to inform participants as they develop their own implementation timelines and impact assessments.

IPRR HLIA



HLIA considers impacts of the IPRR rule to:

- a) AEMO business processes
- b) AEMO procedures
- c) AEMO systems
- d) Participants

These impacts have informed the HLIA's implementation timeline and risks.

Each set of impacts and the implementation approach are discussed in upcoming sections.





1. Dispatch mode

 To integrate presently unscheduled priceresponsive energy resources into NEM scheduling processes.

2. Incentive framework (tenders)

 To encourage participation in dispatch mode.

3. AEMO monitoring & reporting framework

 To understand and manage the impact of unscheduled priceresponsive energy resources on operational demand forecasting processes and market outcomes.

Who would participate?



Less capability for dispatch (More costly to participate)

Aggregated large controllable priceresponsive loads (C&I customers)

Aggregated demand response portfolio (including EV demand response)

Non-scheduled generating units/ BDUs (community batteries)

Residential controllable priceresponsive loads

Exempt generation/ BDUs (IRP Small Resource Aggregators)

VPP operators (retailers) with residential battery aggregation

More capability for dispatch (Less costly to participate)

Early participants Future participants

IPRR rule refresher: New terminology and concepts



No new participant category

An Integrated
Resource
Provider, Market
Customer or
Generator...



...applies to "nominate" one or more QUALIFYING RESOURCES (within a single ZONE)...



...as a
VOLUNTARILY
SCHEDULED
RESOURCE
(VSR)...



... and is taken to be a VOLUNTARILY SCHEDULED RESOURCE PROVIDER (VSRP) in respect of its VSR.

- Non-scheduled generating units
- Non-scheduled bidirectional units (BDU)
- 'Market loads' i.e. market connection point that is a non-scheduled load
- Small resource connection points e.g. exempt small BDU or small generating unit (GU).

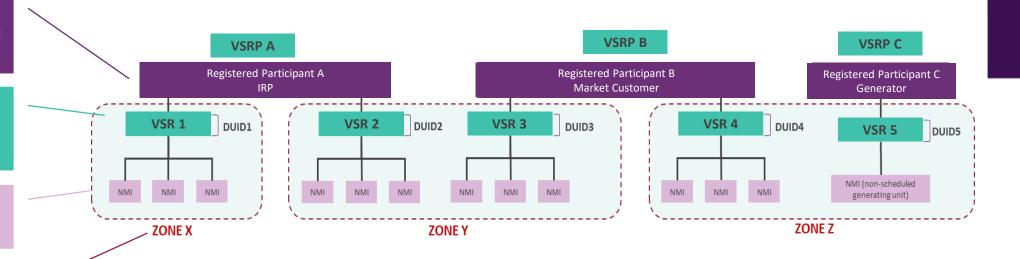
Dispatch mode implementation: Participation building blocks

Participants are registered under existing framework

Participants apply to nominate and aggregate qualifying resources into VSR

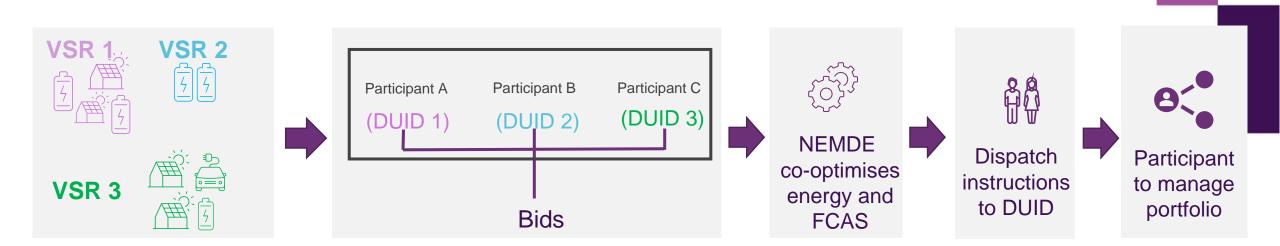
VSR nomination is at NMI level and VSRP must be FRMP for NMIs

VSR corresponds to a DUID, with each DUID may containing NMIs from a single zone



Dispatch mode design

Consistent with existing framework for scheduled resources



Every 5 minutes, Traders will receive a dispatch instruction per DUID:

- A single bi-directional dispatch instruction representing the net flow to be achieved by its DUID
- Enablement for each FCAS

VRSPs will need to:

- Disaggregate the dispatch instruction to manage its portfolio accordingly
- Comply with the Market Ancillary Services Specification (MASS) and the NER with respect to the services they provide
- Ensure that their bids and any subsequent dispatch comply with applicable Flexible Export Limits (FELs)/Dynamic Operating Envelopes (DOEs) across their VSRs

1. Dispatch mode

IPRR rule: VSR participation modes

Participation modes recognise that some resources may only be able to participate in the NEM over specific periods. For example, where a VSR may not have continuous operational capabilities or may operate seasonally.



TEMPORARILY DEACTIVATED VSR...

... during which time the VSR only partially participates in central dispatch



- During the deactivation period, participants submit bids but do not need to conform to dispatch instructions.
- The deactivation status must apply to every qualifying resource aggregated in the VSR.
- Detailed criteria and process to apply for deactivation are to be determined in VSR guidelines (including a notice period).



HIBERNATED VSR

For at least 30 days and no more than 18 months during which the VSR will not participate in central dispatch

- Hibernation request is for full opt-out of dispatch mode (without deregistration) by application to AEMO.
- The hibernation status must apply to every qualifying resource aggregated in the VSR.
- The previous classification approved by AEMO for that qualifying resource (e.g. as a non-scheduled generating unit, non-scheduled bidirectional unit, non-scheduled load (as applicable)) applies.
- Most criteria and process to be determined in VSR guidelines (including a notice period).

Design parameters or assumptions

PARAMETER OR ASSUMPTION	COMMENTS	IMPLEMENTATION
Participation is voluntary	Participation is voluntary but very important to address operational challenges and avoid duplicative grid-scale investment.	IPRR rule establishes the VSR incentive mechanism to encourage participation.
Minimum VSR threshold of 5MW	Changes to a VSRP's portfolio (e.g. churn) could result in a VSR dropping below the minimum size threshold for dispatch mode participation e.g. because of NMIs moving out of a portfolio.	AEMO to consult on the minimum VSR threshold and managing changes via the VSR guidelines consultation.
VSR performance standards	It is expected that a VSRP will be responsible for ensuring the resources within each VSR comply with their distribution connection agreements.	Performance standards agreed with their connecting NSP and/or any conditions in the VSR guidelines.
Flexible export limits	 VSRPs will be required to comply with any applicable FEL (or distribution operating envelope) when submitting their bids for dispatch mode. 	The IPRR rule requires DNSPs to consult with VSRPs when designing flexible export limits → NER 5A.B.3(6) and 5A.E.3(c)(9)
Power system data communications standard applies to VSRs	The design reflects the requirement for a participant to provide telemetry data as per requirements defined in the power system communication standard.	VSRs would use SCADA or SCADA Lite to communicate telemetry data.
New guidelines for VSR operations (VSR Guidelines) See slide 49 for greater detail	 Requirements for nomination of qualifying resources into VSRs Requirements and process for aggregation of VSRs Framework for testing the capabilities of qualifying resources Operational requirements for VSRs 	AEMO to develop the VSR guidelines in consultation with industry.

VSR incentive mechanism (VIM): High-level summary

AEMO tenders to encourage dispatch mode participation VSR incentive procedures to contain tender process details

Successful VSRPs will receive VSR participation payments AEMO recovers VIM costs from NEM participants

AEMO has VIM reporting obligations

- Minimum of 2 tenders over 5-year incentive period (01 April 2026 to 31 December 2031)
- Overall cap of \$50m that can be 'topped up' by external funding from government funding body or regulator
- AEMO to apply VSR incentive principles, including to balance capability building vs capacity.

- Assessment criteria
- Price caps
- Timetable for settlement of payments
- Aspects of the VSR participation agreements.
- Participation
 payments based on
 terms and conditions of
 VSR participation
 agreements.
- Cost recovery needs to be calculated within 40 business days of the end of a financial year.
- VIM establishment and running costs recovered via participant fees
- VSR participation payments (\$50m) recovered from Cost recovery market participants (CRMPs = Generators, Market Customers, IRPs)
- Annually: The aggregate amount of all VSR participation payments payable in each financial year under VSR participation agreements.
- At the end of the fiveyear incentive period: A summary of outcomes, trends and learnings from the VSR incentive mechanism.

Monitoring and reporting framework

As part of the IPRR implementation, AEMO is required to develop a guideline in consultation with industry to cover metrics and statistics which should be considered in the reporting framework.

Issue

- Lots of Unscheduled Price
 Responsive Resources won't, or
 won't have the capability, to
 participate in IPRR (Due to the
 combination of the level of control
 required and the wide range of
 functions, capabilities and
 business models).
- As the magnitude of these resources grow, they will create challenges for AEMO's demand forecasting in the NEM and this may have large consequences for efficient market operation.

Solution

To address these issues, the final rule introduces a monitoring and reporting framework for:

- □ AEMO to identify the presence and issues created by increased Unscheduled Price Responsive Resources through quarterly statistics and an annual report.
- AER to assess the estimated efficiency implications and costs associated with actual demand deviating from forecasts due to Unscheduled Price Responsive Resources.

Outcome

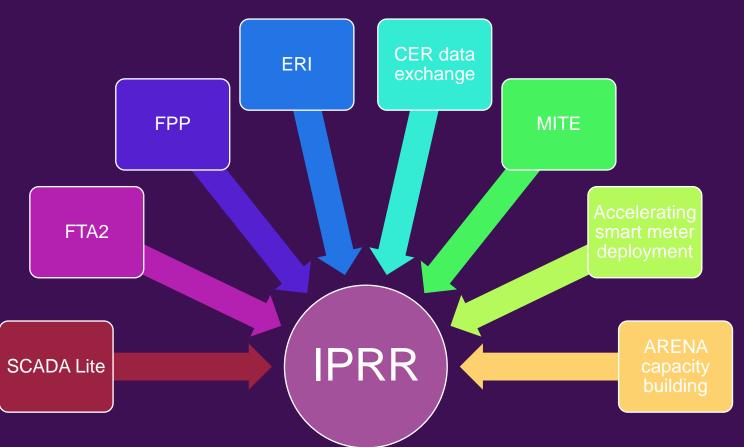
The outcomes from the monitoring and reporting framework will be used by the AEMC to determine:

- When AEMO's demand forecasts are being materially challenged
- If challenges can be addressed by AEMO changing its demand forecasting methods
- Whether a move to retailer-led forecasting of price-responsiveness is warranted.



Related reforms

Other energy reforms are a prerequisite for or complementary to IPRR.



REFORM	RELATIONSHIP TO IPRR
SCADA Lite	 VSRPs would use full SCADA or SCADA lite communications.
FTA:Unlocking benefits of CER through flexible trading	 VSRPs can separate flexible resources to a secondary NMI. Optional second FRMP on flexible resources for large customers.
FPP: Frequency performance payments	 VSRs would be eligible for Frequency Performance Payments.
ERI: Enhancing reserve information	 VSR assets to help signal to the market the aggregated levels of storage available.
CER data exchange	 Identifies use cases and exchange model to support CER coordination.
MITE: Market interface technology enhancements	 Enhanced identity and data exchange capabilities to support service providers & new CER use cases.
Accelerating smart meter deployment	More 5-min capable meters available as a pre-requisite for a VSR.
ARENA capacity building	 Community battery investments are good VSR candidates.



4. IPRR High level implementation assessment

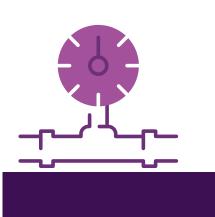
AEMO:

- Emily Brodie
- Nicole Nsair
- Luke Barlow
- Greg Minney



IPRR rule: Impacts to AEMO's processes

Emily Brodie







1. Dispatch mode

 To integrate presently unscheduled priceresponsive energy resources into NEM scheduling processes.



2. Incentive framework (tenders)

 To encourage participation in dispatch mode.



3. AEMO monitoring & reporting framework

 To understand and manage the impact of unscheduled priceresponsive energy resources on operational demand forecasting processes and market outcom

IMPACT

IPRR rule: Impacts to AEMO's processes

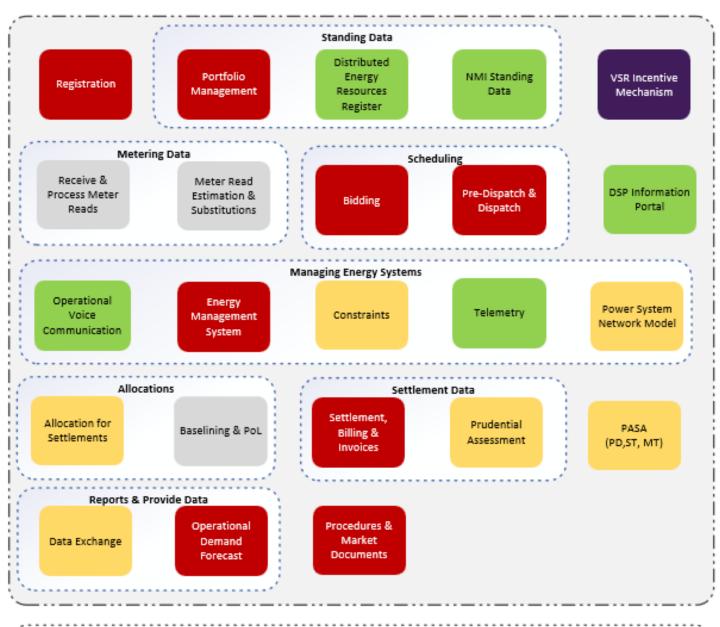
Table 3 Tabular view of focus area impacts from the IPRR draft rule

Impact

	High	 No new unique participant registration category for market participants with VSRs, VSRPs will be registered as IRP. Market Customer or Generator in accordance with the existing participant registration framework. A VSRP must be the financially responsible Market Participant RRPM for the NMs is normating ind VSRs. Introduction of a new runt type of VSR and development of a new inomination process to allow one on even development of a new
		'nomination' process to allow one or more qualifying resources to be nown one or more qualifying resources to be nominated into VSRs by the FRMP (VSRP). Development of a new intal capability assessment process for VSRs to ensure they have the technical capability to participate in scheduling and dispatch processes.
Portfolio Management		 Introduction of minimum VSR capacity threshold for participation.
Fortiono management	High	 New portfolio management processes to establish and maintain VSR portfolios, including nomination/de-nomination, addition/removal of NMIs, VSR configurations, updates to standing data, etc.
		 Impacts associated with implementation and management of new participation modes, including 'temporary deactivation' and 'hibernation'.
		 Portfolio management capabilities to manage customer chum.
		 Potential system updates to manage a greater volume of assets and data.
		 Updates to AEMO Validation processes to manage VSRs, for example VSR management within zones.
DER Register	TBC	 Further assessment required to determine impacts for the DER Register.
NMI standing data	Low	 Further assessment required to determine if there is a need to update Agg Flag assignment to RERT cost recovery carve-outs and FPP.
VSR Incentive mechanism	Very high	Develop new VSR incentive procedures to establish VSR tender processes, see section 4 for more details.
		 Develop new VSR tender process including assessment criteria, methodology and contract development for selecting successful VSR incentive mechanism participants for each VSR tender.
		Implement process changes to:
		 Assess VSR participation and make VSR participation payments
		 Recover costs of establishing, administering and conducting the VSR incentive mechanism (via fees)
		 Recover costs of VSR participation payments (via CRMPs).
		 Potential adjustments to include VSR incentive mechanism participation payments in prudential estimations.
		payment production and
		Assessment of VSR benefits & calculation of 'incentive MW price cap'.
		 Assessment of VSR benefits & calculation of incentive MW price cap'. Reporting of participation payments after VSR tender process (IPRR draft cap's 3.10.44(n)).
		 Assessment of VSR benefits & calculation of 'incentive MW price cap'. Reporting of participation payments after VSR tender process (IPRR draft

Please refer to HLIA for full description of business process impact assessment

Summary of Key Impacts for IPRR



Impact Complexity

Low

Medium

High

Very High

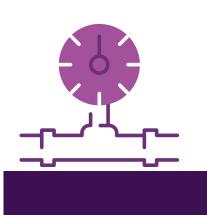
Further assessment required

No Impact



IPRR rule: Impacts to AEMO's procedures

Nicole Nsair





PLEASE REFER TO HLIA FOR FULL MARKET PROCEDURE IMPACT ASSESSMENT

NEW PROCEDURE	IPRR DRAFT RULE	EFFORT	elines, reviews and reports PROPOSED CONTENT AND TIMING		
Voluntarily scheduled	At the second		SOLD CONTENT AND TIMING		
resource guidelines	• 3.10A.3 • 11.17[X].3(a)(2)	High	Develop, consult and publish by 31 December 2025. Required to cover a range of details including: Requirements for nomination of qualifying resources into VSRs Requirements and process for aggregation of VSRs Framework for testing the capabilities of qualifying resources Operational requirements for VSRs, including: Types of data to be submitted Telemetry & communications requirements Thresholds for participation Dispatch conformance criteria Acceptable types of metering installations		
Review of the Voluntarily scheduled	11.17[X].3(c)	High	DNSP data sharing requirements Zonal aggregation requirements Temporary deactivation and hibernation requirements Any other information AEMO considers reasonably necessary. Complete review by 05 November 2029		
AEMO price responsive reporting guidelines	• 3.10B.2 (e)-(g) • 11.17[X].3(a)(1)	High	Develop, consult and publish by 31 December 2025. Required to specify: How AEMO will meet its annual reporting obligations on unscheduled price-responsive resources The information and metrics that AEMO will include in its quarterly reporting on unscheduled price responsive resources.		
	2 10B 2/h)	Hinh	Publish by 30 Sentember each year First report must be outlished by 30		
AEMO price responsive reporting guidelines dunielines	* 3.108.2 (e)-(g) * 11.17[X].3(a)(1) * 3.108.2(b)	нар	Develop, consult and publish by 31 December 2025. Required to specify. How AEMO will meet its annual reporting obsigations on unscheduled price-responsive resources. The information and metrics that AEMO will include in its quarterly reporting on unscheduled price responsive resources.		

EFFORT	CHANGE
Medium / High	Most registration/listsatification discuments will registe updates to accommodate VSR non-increases by Market Participaria. New application forms and guides are likely to be required. The Guide to Registration Exemptions and Production Unit Claws Rossitions may require updates to reflect the new "quelifying resource" reministion processing the registeration of the reministration process. Impact of IPRR to registration documents will depend on the estant. In the registeration of the registeration decomments with depend on the estant.
Medium	Amendments will be required due to the inclusion oil. VER (frew unit type) Changes to dispatch conformance process to manage VERs is different modes of operation (active/himporarily deactive/sed/himporation). Data integration into maintst processes from new VER unit type e.g. price adjusted derivand curve definition, functionally and integration. Functionally and integration frocedures will depend on the select to which VER requirements are included in the VER guide free.
Low	 May need updating to incorporate requirements for VSRs to participate in regulation FCAS.
Low	Amendments to include: New YSR unit type Which modes of YSR operation are eligible to participation in RERT.
Low	 Update procedure to specify how directions apply to VSR units and whether they apply based on active/hemporarity deactivisted/hibernstad modes of operation.
Low	 Procedures will need to describe the methodology for cafculating loss factors for VSRs.
Low/ Medium	 Additional sections may be required to describe how YSRs are represented in constraints and how they are formulated. If switching YSRs between active/temporarity describeded/bibernated modes should result in updates to constraints, then additional procedures whould describe these processes.
Low	 Updates to DSP methodology will be required to describe how VSR are included in the Demand side participation forecasts.
	Medium / High Medium Low Low Low Low Low Low Low Lo

IPRR procedure change scope: Three <u>new</u> documents



1. Dispatch mode

 To integrate presently unscheduled priceresponsive energy resources into NEM scheduling processes.

→ VSR GUIDELINES

Establishes the technical and operational characteristics of VSRs.

2. Incentive framework (tenders)

 To encourage participation in dispatch mode.

→ VSR INCENTIVE PROCEDURE

Specifies a range of matters to support operation of the VSR incentive mechanism / "participation payments".

3. AEMO monitoring & reporting framework

 To understand and manage the impact of unscheduled priceresponsive energy resources on operational demand forecasting processes and market outcomes.

→ AEMO PRICE RESPONSIVE REPORTING GUIDELINES

How AEMO will meet its annual and quarterly reporting obligations.

VSR guideline scope – next slide



Summary of impacts to key market procedures (1/3)

AREA	IMPACT	Timing	COMMENT (see HLIA for detail)		
New VSR guidelines	HIGH	Due 31 Aug 2025	•	Develop new guidelines, significant scope	
System Operations	MEDIUM	Dependency on VSR Guidelines	•	To reflect VSR unit type & participation modes	
Settlements	MEDIUM	Dependency on VSR Guidelines	•	To reflect VSRs in settlements & non-energy cost recovery arrangements for VSRs.	
 Other existing procedures Constraints Operational forecasting and Planning Market and non-market ancillary services 	LOW	 Between Sept 2025 – end of May 2026 Seeking feedback within business teams on timing 	•	Minor/administrative terminology updates to include VSR unit type	
Registration	HIGH / MEDIUM	Due June 2026	•	To reflect VSR unit type & nomination process Impact depends on extent to which VSR requirements are split between registration documents and the new VSR guidelines	
Retail/Metering	LOW	Between Sept 2025 – end of May 2026 • Seeking feedback within business teams on timing	•	Potential change to manage customer churn (would not require system changes) Seeking confirmation of impact from Electricity Retail Consultative Forum (ERCF)	
B2B procedures	NO IMPACT		•	Seeking confirmation from B2B Working Group (TBC)	



<u>Summary</u> of impacts to key market procedures (2/3)

DISPATCH MODE: NEW VSR GUIDELINES

- Requirements for nomination of one or more qualifying resources into VSRs
- Requirements and process for aggregation of VSRs
- Framework for testing the capabilities of qualifying resources
- Operational requirements for VSRs, including:
 - Types of data to be submitted (from VSRPs to AEMO, and from AEMO to VSRPs)
 - Telemetry & communications equipment requirements
 - Thresholds for participation
 - Dispatch conformance criteria
 - Metering installation requirements
 - Distribution Network Service Provider (DNSP) or (where relevant) Transmission Network Service Provider (TNSP) data sharing requirements
 - Zonal aggregation requirements
 - Deactivation and temporary hibernation requirements
 - Any other information AEMO considers reasonably necessary.





<u>Summary</u> of impacts to key market procedures (3/3)

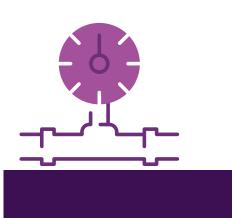
P	PROVISIONAL INCENTIVE FRAMEWORK					
AREA IMPACT			COMMENT			
New VSR incentive procedures HIGH		HIGH	Develop new procedures			
• Settlements MEDIUM		MEDIUM	To reflect: VSR participation payments VSR incentive mechanism cost recovery.			

1	MONITORING & REPORTING FRAMEWORK				
A	REA	IMPACT	COMMENT		
•	AEMO price responsive reporting guidelines	HIGH	Develop new guidelines		
•	Annual & quarterly reporting on unscheduled price responsive resources	HIGH	Develop new reports		



IPRR rule: Impacts to AEMO's systems

Luke Barlow





IPRR rule: Summary of impacts to AEMO's systems

1. Dispatch mode

 To integrate presently unscheduled priceresponsive energy resources into NEM scheduling processes.



2. Incentive framework (tenders)

 To encourage participation in dispatch mode.



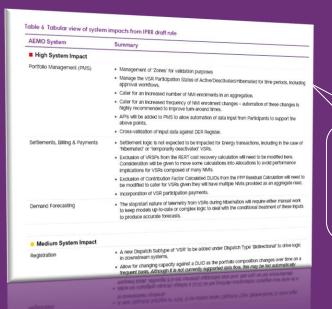
3. AEMO monitoring & reporting framework

 To understand and manage the impact of unscheduled priceresponsive energy resources on operational demand forecasting processes and market outcome

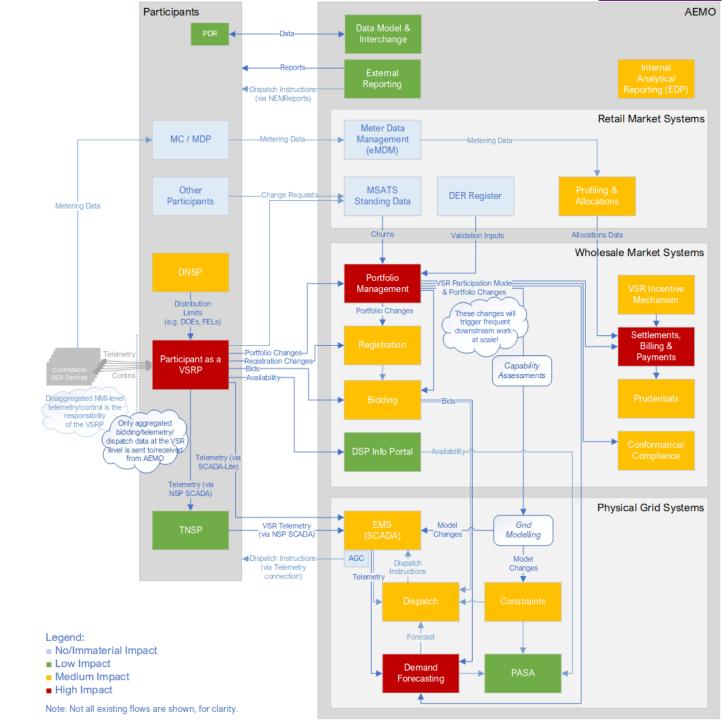
LOW

IMPACT

IPRR rule: Impacts to AEMO's systems



Please refer to HLIA for full description of system impact assessment





IPRR rule: Impacts to participants

Greg Minney

Disclaimer



This presentation includes material outlining AEMO's interpretation of indicative impacts of national energy market (NEM) reforms to energy market systems and processes for energy industry participants, as at 13 February 2025.

The interpretations expressed in this presentation are not binding on AEMO. The interpretation of the impact of NEM reforms may change at any time.

Anyone participating or intending to participate in the NEM should obtain detailed advice about the application of the National Electricity Rules and applicable laws, procedures and policies to their specific circumstances.

To the maximum extent permitted by law, AEMO and its employees or consultants are not liable for any statements in, or omissions from, these materials, or for any use of or reliance on them.





STAKEHOLDER TYPE	INDICATIVE IMPACT	COMMENT
INTEGRATED RESOURCE PROVIDER	Opting to participate in IPRR: High	Please see HLIA for more detail on indicative IPRR impacts to those market participants that choose to participate as VSRPs.
MARKET GENERATOR MARKET CUSTOMER	Not participating in IPRR: Low	 High impacts to those market participants that choose to participate as VSRPs. Obligations would include registration, establishing VSRs, portfolio management, bidding, dispatch, settlement etc
		 Existing market participants choosing not to operate VSRs can continue using the pre-IPRR data model. They will only need to adopt the data model updated for IPRR if they wish to fully reconcile the cost recovery of VSR participation payments.
		 If there are changes to Portfolio Management System interfaces, then existing PMS users should assess the change impact to their systems.
		• If there are changes to AEMO's systems or processes arising from the VSR Guidelines zonal aggregation requirements, then participants should assess the flow-on change impacts to their own systems and processes.
		 Potential changes may be required to Market Settlement and Transfer Solutions (MSATS) procedures to manage customer churn. Note: This should not require system changes in MSATS.
TRANSMISSION/	Medium	Please see HLIA for more detail on indicative IPRR impacts to TNSPs/DNSPs
DISTRIBUTION NSP		 VSRPs will be responsible for ensuring that their bids and any subsequent dispatch complies with applicable distribution/transmission connection agreements.
		 Any requirements for VSRPs to receive information regarding limits applicable to the NMIs that comprise their VSRs is out of scope for this rule change.
		 IPRR rule requires DNSPs to consult with VSRPs when designing flexible export limits.
		Receive any new VSR-related reports or data feeds:
		Visibility of NMIs that are part of a VSR
		VSR participation mode
		Aggregated scheduling information

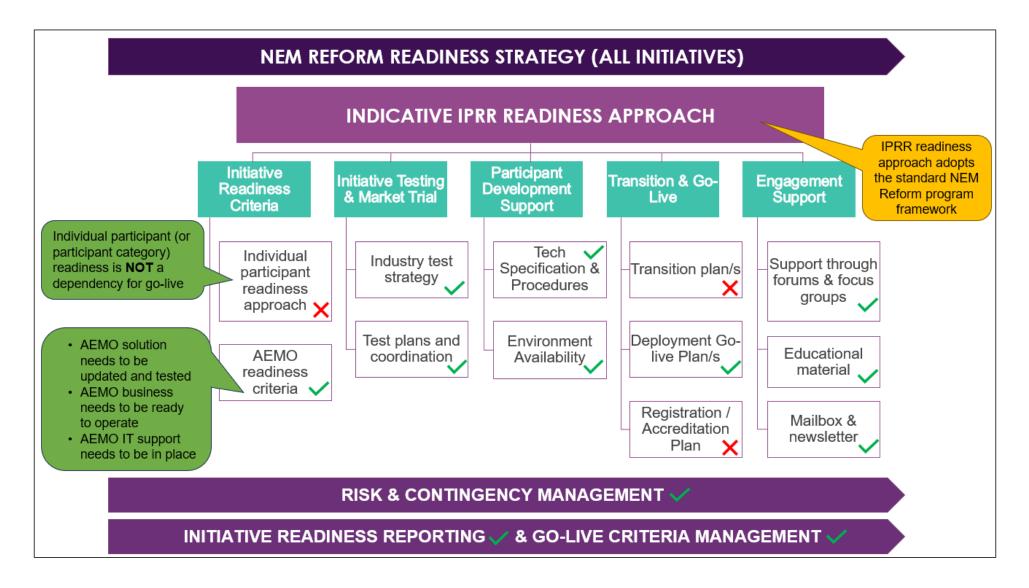




STAKEHOLDER TYPE METERING PROVIDERS	No impact expected	 As part of the VSR guidelines development, AEMO must consult on and determine acceptable types of metering installations for participating connection points. AEMO expects that the revenue meter at the participating site would need to adhere to requirements in NER Chapter 7. For small customers, this would typically mean a type 4 meter that is capable of recording data in five-minute intervals.
METERING PROVIDERS	No impact expected	 As part of the VSR guidelines development, AEMO must consult on and determine acceptable types of metering installations for participating connection points. Revenue meters at the connection point must meet NER CH7 and AEMO's procedures e.g. For small customers, this would be a type 4 meter. For secondary settlement points participating in a VSR, this would be type 8A, type 8B and type 9 metering installations.
METERING DATA PROVIDERS	No impact expected	No change to current metering data processes for VSRs.
EMBEDDED NETWORK MANAGERS	No impact expected	VSRPs can nominate resources at embedded network child connection points, if they are an on-market connection point.



IPRR: Indicative readiness approach





5. Feedback and next steps

Ulrika Lindholm (AEMO)

SEEKING FEEDBACK



Implementation approach

→ To what extent has AEMO appropriately captured the IPRR market design based on the AEMC's IPRR rule? What changes do you propose and why?

Participant impacts

- → To what extent do you agree with the impact and impact ratings AEMO has identified for each stakeholder type? What changes do you propose and why?
- → What additional participant impacts and challenges do you anticipate?
- → What are your views on each of the elements of the indicative readiness approach and their timings?



AEMO impacts

- → To what extent do you agree with the impact and impact ratings AEMO has identified for its:
 - 1. business process changes,
 - 2. procedure changes, and
 - 3. system changes?
- → What alternatives to these do you propose and why?

Next steps



STAGE	DATES	RESPONSIBLE
Final rule determination	Thu 19 Dec 2024	AEMC
Publish final HLIA for comment	Thu 6 Feb 2025	AEMO
AEMO industry briefing on final HLIA	Thu 13 Feb 2025	AEMO
AEMO feedback period on final HLIA closes	Thu 27 Feb 2025	Industry to provide feedback
 Publish draft HLIA v1.1 Incorporates industry feedback where appropriate 	Thu 20 Mar 2025	AEMO
A FAAO walaamaa fa adharak an Ha final IIIIA		

AEMO welcomes feedback on its final HLIA

Please provide your feedback on the <u>HLIA</u> via <u>nemreform@aemo.com.au</u> by Thursday 27 February.

If you are affected by IPRR, consider participating in upcoming consultations and forums:

- VSR Guidelines: Issues paper published Thu 13 Feb. Register for forum here: https://forms.office.com/r/CEyuC4FZzH
- VSR Incentive Procedure: Issues paper publication Tue 01 Apr (TBC). Register for forum here: https://forms.office.com/r/CEyuC4FZzH
- Price Responsive Reporting Guidelines: Issues paper publication Fri 11 Apr (TBC).



6. Q&A



7. How to get involved & close

Ulrika Lindholm





Forums	Forum focus	Cadence	Approach
Executive Forum	Program overview and status update	3 per Year	Nomination
Reform Delivery Committee (RDC)	Long term implementation planning perspective	Quarterly	Nomination
Program Consultative Forum (PCF)	Inflight initiatives status & co-ordination	Monthly	Open
Implementation Forum	Implementation of reforms	Monthly	Open
Electricity Wholesale (EWCF) & Electricity Retail (ERCF) Consult	Procedures working groups	Monthly	Open
Industry Testing Working Group	Testing	Monthly	Open
Working Groups	Inflight	As appropriate	As appropriate



To learn more, please visit:

- AEMO | NEM Reform Program Forums
- AEMO | NEM Reform Program Initiatives
- AEMO | Industry Meetings Calendar
- or contact the program at NEMReform@aemo.com.au.

Subscribe to the NEM Reform Newsletter here

Focus / working groups for inflight initiatives include:

Initiative working groups

Market Integration Technology Enhancement WG (IDX/IDAM/PC)

Industry Testing Working Group (ITWG) – IT technical implementations



For more information visit



NEMReform@aemo.com.au



AEMO | NEM Reform initiatives | IPRR



Appendix A – AEMO Competition Law Meeting Protocol



AEMO Competition Law - Meeting Protocol

AEMO is committed to complying with all applicable laws, including the Competition and Consumer Act 2010 (CCA). In any dealings with AEMO, all participants agree to adhere to the CCA at all times and to comply with appropriate protocols where required to do so.

AEMO has developed meeting protocols to support compliance with the CCA in working groups and other forums with energy stakeholders. Before attending, participants should confirm the application of the appropriate meeting protocol.

Please visit: https://aemo.com.au/en/consultations/industry-forums-and-working-groups



Appendix B -Glossary

Glossary



TERM	DEFINITION
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
API	Application Programming Interface
ARENA	Australian Renewable Energy Agency
B2B	Business to business
B2M	Business to market
BDU	Bidirectional Unit
CER	Consumer Energy Resources
COAG	Council of Australian Governments
CRMP	Cost recovery market participant
DER	Distributed energy resources
DNSP	Distribution network service provider
DRSP	Demand response service provider
DSP	Demand side participant
DUID	Dispatchable unit identifier

TERM	DEFINITION
ERI	Enhancing reserve information
ESB	Energy Security Board
EV	Electric vehicle
FCAS	Frequency control ancillary service
FEL	Flexible export limit
FPP	Frequency performance payments
FTA2	Unlocking benefits of CER through flexible trading
FRMP	Financially responsible market participant
HLIA	High level implementation assessment
IESS	Integrating energy storage systems
IDAM	Identity access and management
IDX	Industry data exchange
IPRR	Integrating price responsive resources
IRP	Integrated resource provider
ISP	Integrated system plan
MASS	Market ancillary services specification

TERM	DEFINITION
MITE	Market interface technology enhancement
NEM	National electricity market
NEMDE	National electricity market dispatch engine
NEO	National electricity objective
NER	National electricity rules
NMI	National metering identifier
NSP	Network service provider
PASA	Projected assessment of system adequacy
PMS	Portfolio management system
PoL	Predictability of load
RDC	Reform Delivery Committee
SCADA	Supervisory control and data acquisition
V2G	Vehicle-to-grid
VPP	Virtual Power Plants
VSR	Voluntarily scheduled resource
VSRP	Voluntarily scheduled resource provider
WDRM	Wholesale Demand Response Mechanism