



Ref. A5797599

20 March 2025

Ms Violette Mouchaileh
Executive General Manager, Reform Delivery
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

By email: NEMReform@aemo.com.au

Dear Ms Mouchaileh,

Development of Voluntary Scheduled Resource Guidelines

Powerlink Queensland (Powerlink) welcomes the opportunity to provide feedback on the Australian Energy Market Operator's (AEMO's) Development of Voluntary Scheduled Resource Guidelines Consultation Paper.

Powerlink support integrating price-responsive resources into NEM dispatch and advancing CER visibility and coordination in the NEM.

Powerlink appreciates the complexity of aggregation for VSR providers, particularly in the early days when the quantity of VSRs is likely to be small. However, we question whether the proposed congestion modelling zone aggregation is sufficient for incorporation into the left hand side of constraint equations to facilitate participation in dispatch. We recommend that data capture and systems for VSRs consider the relationship between National Meter Identifier (NMI), Transmission Node Identifier (TNI), and AEMO VSR zones. This will enhance operational flexibility of VSRs in various power system scenarios.

For example, if proven, we foresee there could be opportunity to contract with VSRs to resolve local transmission level concerns resulting from planned outages or contingency management if the capability can be summated to a TNI. While aggregation at a congestion modelling zone level may provide opportunities in responding to price signals, if the amount of VSR scales up to a material level, it is likely to be limited if the aggregation is not granular enough to be able to respond to (or be used to manage) network issues. We feel that greater power system opportunities for VSR may be visible if we are able to understand the capability at a TNI level.

Powerlink would welcome an opportunity to meet with AEMO staff to discuss these issues further ahead of AEMO's Draft Guidelines. Should your team wish to discuss this submission further, please contact Alexandra Price, Manager Strategic & Future Network Operations on 0474 805 706 or by email at alexandra.price@powerlink.com.au.

Yours sincerely,

Signed by:

Gary Edwards

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