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Australian Energy Market Operator

NEM Reform Program

Email submission to NEMReform@aemo.com.au

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Voluntarily Scheduled Resource Guidelines – Second Draft Report

AGL Energy (**AGL**) welcomes the opportunity to provide responses to the questions posed by the Australian Energy Market Operator (**AEMO**) in response to the abovementioned draft report and guidelines.

AGL supports the intent of the Integrating Price Responsive Resource (IPRR) Rule and welcomes AEMO's open consultation process to date. AGL would like to highlight the following matters ahead of the commencement of 'dispatch mode':

- The proposed voluntary scheduled resource (VSR) nomination requirements in section 2.2 of the guidelines will place a large operational burden on voluntary scheduled resource providers (VSRPs) and could limit participation in dispatch mode. Correctly accounting for the impact of consumer energy resources (CER) and loads which are not under direct orchestration would be extremely complex and subject to frequent change. AGL strongly encourages AEMO to consider simplifying these requirements to promote VSR participation.
- It may not be technically feasible to meet the proposed ramp rates in the *Power System Security Guidelines* with large aggregated mixed Original Equipment Manufacturer (OEM) residential battery fleets. VSRPs will require granular data from these fleets to satisfy themselves they can meet aggregated requirements.
- AGL seeks the opportunity to engage with AEMO and will continue to engage with distribution network service providers (DNSPs), to determine how dynamic operating envelopes (DOEs) and dispatch mode participation can be reconciled. AGL maintains that VSRPs should not be held accountable for dispatch conformance if DOEs change at short notice without prior knowledge of the VSRP.

We look forward to continuing to engage with AEMO on the implementation of this Rule. Appendix A includes detailed feedback on key topics. If you have any queries about this submission, please contact Andrea Espinosa on aespinosa2@agl.com.au.

Yours sincerely,

Kyle Auret

Senior Manager Policy and Market Regulation

About AGL

Proudly Australian for more than 187 years, AGL supplies energy and other essential services to residential, small and large businesses and wholesale customers. AGL is committed to providing our customers with simple, fair and accessible services as they decarbonise and electrify the way they live, move and work. AGL is investing in flexibility and has been making strong progress against our grid-scale battery and distributed energy resources (DER) targets. As of FY25 AGL had 1.49 GW of decentralised assets under orchestration, and a FY27 target of 2.5 GW of demand-side flexibility. AGL is also a market leader in the development of innovative products that enable consumers to make informed choices on how and when to optimise their energy usage to better manage their energy costs.

Appendix A – Feedback on second draft Voluntarily Scheduled Resource guidelines

Topic	Feedback
Nomination of VSRs	It would be extremely complex for VSRPs to fully meet the information requirements in section 2.2 (Table 4). These requirements would create yet another barrier to entry into dispatch mode. AGL urges AEMO to consider the large operational burden of obtaining this level of information from customers. As raised in AEMO's previous consultation, it will be difficult for VSRPs to provide information on resources which are not under direct orchestration as the retailer/aggregator does not necessarily have information on CER previously installed at the premises. For the avoidance of doubt, AGL considers that in a residential battery VPP, the asset under orchestration is the battery and not the solar system. While the residential battery system's price responsive unit power capacity can be determined, determining rooftop solar DC and AC is not always easy (even the customer may not know what they have installed). While this *may* be detectable through data analytics, the VSRP may need summer data to determine the solar AC power max (and even then, the VSRP would not know the DC component). Accurately accounting for non-price responsive components, especially the nameplate of site loads, would be very difficult for a site-by-site assessment. This is a complex data analytics problem, which would vary seasonally and each time the customer acquires a new load (e.g., a new space heater). This analysis may be feasible at a fleet level, which is a simpler concept than assessing each National Meter Identifier's (NMI) peak import and export powers. With reference to the maximum ramp rate requirements in Table 4, AGL reiterates how complex it is to manage net site ramping inclusive of uncontrolled site loads.
Portfolio management	Meeting the requirements in section 3 of the guidelines will require a very large uplift of the Portfolio Management System (PMS). It will be necessary for this system to transition to a smoothly operating VSR portfolio system which can meet the data capture needs specified in the guidelines.
VSR zones	AGL supports the VSR zone mapping tool and proposed process.

Topic	Feedback
Capability assessment	***Congestion modelling assessment:*** AGL is unclear what the congestion modelling assessment proposed under section 5.1.2 of the guidelines would entail. As VSRs could be comprised of highly diverse sites across the zone, would the assessment study inter-zone congestion? Where possible, AGL encourages AEMO to lower barriers to entry for VSR registration to promote participation in dispatch mode. ***Aggregated telemetry:*** At this stage, it is uncertain whether VSRs comprised of mixed-OEM residential battery systems will be able to meet SCADA-lite or the Power System Data Communications Standard. The ability to obtain data from mixed-OEM residential battery fleets remains a key barrier for residential VSRs, as VSPRs will require this information to satisfy themselves they can meet any aggregated requirements.
Dispatch	On section 9.1(c), AEMO should be aware that State of Charge (SOC) will become a rougher estimate and less certain further into the future. On section, 9.1(e), AGL reiterates the difficulty for mixed-OEM fleets to adhere to 5-minute ramps as specified in the NER.
VSR conformance	Section 7.1(g) of the guidelines specifies that VSRPs are required to comply with applicable network limits. However, AGL is unclear how VSR operators would be expected to resolve conflicts between DOEs and dispatch instructions if these are broadcast mid-interval. As noted in prior submissions, VSRPs should not be held accountable for dispatch conformance if DOEs change at short notice without prior knowledge of the VSRP, particularly if network limits are meant to take precedence over market participation.
Data & information sharing	AGL is broadly supportive of allowing VSRPs to voluntarily share pre-dispatch information with DNSPs at the point of nomination. However, the proposed timeline and intervals (T-48, T-36, T-30, T-24) may be too early and too far apart to be useful for VSR operations. For VSRPs, it may be necessary to exchange information (revised bids / revised network allocation) within the last hour prior to the start of the trading interval. Therefore, this option could go underutilised with VSRPs opting into their own information sharing arrangements with DNSPs.