AEMO
AUSTRALIAN ENERGY MARKET OPERATOR

Level 12
171 Collins Street
Melbourne VIC 3000

Postal address
GPO Box 2008
Melbourne VIC 3001

T 1300 858 724
F 03 9609 8010
E info@aemo.com.au

12 September 2024

Ms Anna Collyer
Chair
Australian Energy Market Commission
Sydney NSW 2000

By online submission

Dear Ms Collyer,

Submission: Draft determination on Integrating price-responsive resources into the NEM

AEMO welcomes the opportunity to provide a submission to the Australian Energy Market Commission's (AEMC's) draft determination on *Integrating price responsive resources into the National Electricity Market* (NEM), which progresses its consideration of AEMO's 'Scheduled Lite' rule change proposal.

AEMO appreciates the AEMC's commitment to understanding the complex challenges the rule change proposal aims to address and its collaborative approach to developing enduring solutions for the integration of consumer energy resources (CER) into the NEM.

Good consumer outcomes, choice and market efficiency, and security and reliability must remain the central tenets that guide the reforms we deliver.

Attachment 1 provides AEMO's views on specific areas of the draft rule, including the reporting framework, elements of Dispatch mode, incentive mechanism and implementation timing considerations. AEMO supports the need for an incentive mechanism that ensures the policy intent of IPRR is delivered. AEMO is keen to collaborate with the AEMC and industry to clarify objectives and assess design options to deliver the best possible incentive framework to support enduring participation in IPRR.

Attachment 2 outlines key aspects of AEMO's initial Draft High-Level Implementation Assessment (HLIA; v0.1) and highlights some of the specific feedback AEMO received from industry following its publication.

Attachment 3 provides the second iteration of AEMO's HLIA (v0.2), which takes into consideration the feedback provided by industry and further work by AEMO to develop its proposed implementation approach.

AEMO looks forward to continuing to work with the AEMC as it approaches its final determination. Should you wish to discuss any of the matters raised in this submission, please contact Kate Reid, Manager DER and Retail Reform at kate.reid@aemo.com.au.

Yours sincerely,

Violette Mouchaileh

Executive General Manager, Reform Delivery

Attachment 1: Comments on draft rule

The following comments on the draft rule have been informed by the feedback received from industry via AEMO's HLIA consultation. A summary of the specific feedback received is provided in Attachment 2.

Unscheduled price responsive resources reporting framework

AEMO supports the introduction of an AEMO and Australian Energy Regulator (AER) monitoring and reporting framework for unscheduled price-responsive resources. The anticipated growth in these resources over the coming years will pose significant challenges to AEMO's demand forecasting capabilities and incur substantial costs for forecast production. This framework, if effectively designed, has the potential to support AEMO's and industry's understanding of the impact of these resources on demand forecasting processes and identify additional future solutions to manage the challenges they pose. The following subsections raise specific issues AEMO considers need to be addressed to ensure the framework can deliver the intended outcomes cost-effectively.

Annual reporting

AEMO considers that it will be challenging to directly attribute patterns in the use of unscheduled price-responsive resources to forecast and actual spot prices. Instead, the reporting should focus on identifying patterns in regional demand forecast deviations in response to spot prices, and then understanding the contribution of unscheduled price-responsive resources to these deviations (as is described in subsequent clauses). AEMO proposes the following adjusted wording for Clause 3.10B.2 (b)(1)(ii):

> *(ii) patterns in regional demand forecast deviations to the extent identifiable, in response to forecast and actual spot prices;*

In addition, reporting on the contribution of unscheduled price-responsive resources to forecast deviation is complex due to the need to estimate and attribute effects to specific resources which AEMO does not have direct visibility of. AEMO suggests the rule should make explicit that reporting on the contribution of these resources to forecast deviations is at the regional level, which is more cost-effective for AEMO to deliver and more likely to result in useful outputs. AEMO suggests that Clause 3.10B.2 (b)(1)(iii) be adjusted as follows:

> *(iii) the approximate contribution of unscheduled price responsive resources to forecast deviations at regional level;*

The draft rule requires AEMO to report on the impact of price-responsive resources on forecast deviations concerning additional payments to ancillary service providers and cost recovery market participants. AEMO considers that attributing these additional payments to forecast deviations caused by unscheduled price-responsive resources would involve significant effort, with resourcing requirements dependent on the precision with which these effects are estimated. To avoid issues with interpretation, AEMO suggests removing the reference to AEMO's "best" estimate as this may imply the allocation of substantial resources and effort beyond the benefit provided by the estimation. Furthermore, the payments under Clause 3.15.6AA should not be considered as "*ancillary service transactions*". Frequency Performance Payments (FPP) are not an ancillary service; rather, it is a financial mechanism designed to encourage all market participants to operate their facilities in a manner that helps maintain the power system frequency around its nominal value. AEMO proposes adjusting Clause 3.10B.2 (b)(2) as follows:

AEMO's estimate of the impact of unscheduled price responsive resources on forecast deviations in relation to additional amounts paid to:

(i) Ancillary Service Providers for additional ancillary services that are enabled; and

(ii) Cost Recovery Market Participants for payments under clause 3.15.6AA;

Quarterly statistics

AEMO considers that the proposed timeline for publishing the first quarterly statistics is unrealistic. For each quarter, AEMO requires adequate time to process, validate and finalise data before publishing relevant statistics. A reasonable timeline for publishing quarterly statistics would be within two weeks after the completion of each quarter.

AEMO price-responsive reporting guidelines

AEMO already has reporting obligations such as the Electricity Statement of Opportunities (ESOO) and the Demand Side Participation Information Portal (DSPIP), through which it can request information from participants. AEMO may leverage some information and processes from existing frameworks to fulfill its new obligations. However, as these frameworks are not designed to provide data suitable for use in operational forecasting functions, AEMO may benefit from the explicit ability to request new information from participants to assist in meeting its obligations under the new reporting framework. Therefore, it is recommended to include in clause 3.10B.2 an obligation for Registered Participants to provide to AEMO information relevant to the reporting framework in accordance with the AEMO price responsive reporting guidelines. The description of the required content of the guidelines in clause 3.10B.2(f) would then be expanded to include specification of the information that AEMO may request from Registered Participants for the purpose of fulfilling its obligations under paragraphs (b) and (c) of clause 3.10B.2.

The draft rules require AEMO to develop, publish, and amend the price-responsive reporting guidelines in accordance with the *Rules consultation procedures*. AEMO may need to adapt and update its methodologies for reporting on various topics in the reporting framework over time, in response to factors such as data availability and the materiality of unscheduled price-responsive resources impact. Conducting a full consultation process on the guidelines each time AEMO seeks to make improvements to its monitoring and reporting processes would be time-consuming and may slow the process of enhancement of the guidelines and reporting framework over time. Additionally, under Clause 3.10B.2 (b)(7)(i), AEMO is required to publish its methodologies for considering and managing the impacts of unscheduled price-responsive resources on load forecasts as part of the annual reporting process. This will provide the industry with visibility into how AEMO is managing the impacts of unscheduled price responsive resources on load forecasts. Given these considerations, it is suggested to reconsider the requirement for AEMO to consult on updates and amendments to the price-responsive reporting guidelines.

Dispatch mode

Participation Modes: Temporary Deactivation and Hibernation

Feedback from stakeholders, both in the early stages of the IPRR rule change proposal and in relation to the HLIA, is that Voluntarily Scheduled Resource (VSR) participation modes are valuable. There was strong support for 'temporary deactivation' and 'hibernation' modes of VSR operation, with supporting examples provided:

- Extended asset outages

- Where access to consumer energy resources is limited by the product offering to the customer, for example X hours access to the battery in the year
- Reliability & availability is dependent on customers' internet connections
- Circumstances where VSRs are comprised of seasonal assets, such as agricultural generation.

AEMO is supportive of enabling VSRs to withdraw from central dispatch for periods of time, owing to the nature of assets within the aggregations. However, both temporary deactivation and hibernation modes add significant implementation cost and ongoing operational cost and complexity to the IPRR mechanism. This is particularly for portfolio management, bidding, dispatch, settlements and forecasting systems and processes.

As such, AEMO requests that AEMC consider extending the maximum duration of 'temporary deactivation' to more than 7 days. This could lessen the ongoing operational cost where VSRs opt to use an extended 'temporary deactivation' rather than switching into and out of hibernation mode. This is because hibernation mode would be more complex and more time consuming to administer than temporary deactivation.

Distribution Network Limits

AEMO supports the AEMC's position requiring VSRPs to ensure that their bids and any subsequent dispatch comply with applicable Flexible Export Limits (FELs)/Dynamic Operating Envelopes (DOEs) across their VSRs. As distribution limits are still being developed by Distribution Networks Service Providers (DNSPs), it is not feasible to incorporate these limits into dispatch processes for VSRs. Incorporating distribution limits would require distribution limits data from the corresponding National Metering Identifiers (NMIs) in the NEM Dispatch Engine (NEMDE), which is not yet available and requires standardised information sharing at the interface between AEMO and DNSPs. Additionally, including these limits in NEMDE would significantly increase the complexity of implementing the mechanism.

AEMO also supports the AEMC's expectation that DNSPs should design their systems and processes for implementing DOEs to facilitate dispatch mode participation by VSRPs. It is acknowledged that for VSRPs to participate in dispatch mode, they need advance access to distribution limits data, and hence, it is expected that DOEs will be provided and updated within a timeframe that allows VSRPs to incorporate them into their bids.

Stakeholder feedback on the HLIA indicates a need for further clarity and communications on how distribution network limits and VSR dispatch interrelate. AEMO encourages the AEMC to engage with industry and consider providing more information on the interaction of DOEs with this rule change. AEMO looks forward to continued engagement with the AEMC, DNSPs, and the industry as distribution limits are being developed and implemented.

Settlement Changes (RERT/FPP)

NMIs nominated into VSRs will be settled for energy as they are today. However, changes to AEMO's metering and settlement systems will be required to implement Reliability and Emergency Reserve Trader (RERT) cost recovery carve-outs and FPP participation as determined the draft rule. These applications require AEMO to identify and appropriately manage the exclusion of VSR NMIs from RERT cost recovery calculations and FPP residual calculations in our systems respectively. AEMO will provide further detail on the implementation approach and impacts of these changes for industry participants in future iterations of the HLIA.

AEMO suggests that the AEMC also consider excluding VSRs from funding compensation for directions under NER 3.15.8. As with RERT cost recovery calculations, the adjusted consumed energy of scheduled loads and

scheduled bidirectional units are excluded in the calculation of compensation recovery amounts for relevant intervention price trading intervals for which a dispatch bid was submitted. For consistency, the AEMC may wish to extend this to VSRs as the capability to exclude them from these calculations will be enabled as a biproduct of delivering against the other applications described above.

Incentives to Participate in IPRR

Well-timed incentive arrangements for building capability are a priority to drive efficient and enduring participation in the IPRR mechanism from a range of resource types. AEMO supports incentives that avoid unnecessary complexity and encourage a diversity of price-responsive resources to participate in the NEM, from purely residential VSRs to VSRs comprised of larger standalone or commercial/industrial *qualifying resources*. This would enable AEMO and participants to learn from a range of early adopters and respond appropriately to support continued IPRR uptake.

In contemplating the most appropriate way forward AEMO is interested to understand whether there are other ways through which a mechanism can most efficiently target the resources the policy is seeking to activate. AEMO is conscious there has not been sufficient time to workshop the concept and best ways to achieve this. Both future VSRPs and the market as a whole may benefit from further exploration and consultation on the range of options to ensure the chosen framework most efficiently drives initial and enduring participation. This includes understanding the impacts of the design on consumers, VSRPs and other Market Participants, getting a clear view of the objectives of the mechanism, and understanding how it might work with existing and future jurisdictional policies to incentivise capacity investment.

Separate to the comments above, AEMO has assessed the VSR incentive mechanism (VIM) as proposed in the IPRR draft rule and provides the following observations.

VSR incentive objective

The IPRR draft rule sets out the VSR incentive objective which is "to maximise *VSR Benefits* by incentivising… *voluntarily scheduled resources*, while minimising the cost of facilitating participation through participant payments." This objective as currently structured may have the unintended consequence of prioritising VSR capacity over VSR capability building, even when allowing for the level of flexibility provided through the *VSR incentive principles*.

AEMO therefore encourages the AEMC to clarify the outcome it is seeking from the VIM (capability building and/or capacity) and to design the components of the VIM accordingly in the IPRR final rule, preferably via further engagement with a range of stakeholders. Ensuring that the VIM and its objective/s are designed to work holistically with other potential avenues for longer-term participation incentives, such as CER/DER participation in a Capacity Investment Scheme (CIS), should also be further considered.

Operating the VIM

AEMO has existing capability to procure contracts for services as described in the IPRR draft determination. These existing processes would only partially support VIM implementation because there are operational elements of the proposed incentive scheme that would be additional to AEMO's traditional roles and that require more complex updates to AEMO's NEM settlement systems and processes. The final rule would need more detail for AEMO to appropriately implement and administer these new elements, including:

- **Calculating *VSR benefits*** as an input to the *Incentive MW price cap* for each VIM tender.
  - The calculation of *VSR benefits* appears to be a distributional economic assessment. Economic assessments of consumer benefits are typically outside of AEMO's remit as the market and system operator.
  - Establishing the proposed inputs[1] into the *VSR benefits* calculation would require non-trivial assumptions and scenarios. Time-consuming consultation would likely be needed to mitigate the risks of over- or under-calculating the *VSR benefits* and any resulting disputes.
  - If the VIM is maintained in the final rule, AEMO requires a more prescriptive method of establishing *VSR benefits* and/or the *Incentive MW price cap*. This includes having specific calculations in the IPRR final rule defining how each element of the *VSR Benefits* should be calculated by AEMO. AEMO considers that this approach would reduce implementation and operational costs and risks.
- AEMO supports the *VSR incentive principles* of needing to consider diversity of resources, price responsiveness and capacity factors when **awarding *VSR participation agreements*** in that it would allow AEMO to balance the need for IPRR capability building against those VSRPs who would bring the largest amount of capacity. However to minimise implementation risk, AEMO requires more detail in the IPRR final rule and/or determination to clarify how AEMO should balance awarding V*SR participation agreements* for VSR capability building and VSR capacity, appropriate to the AEMC's policy intentions.
- AEMO seeks clarification in the IPRR final rule and/or determination around the proposed $50 million *VSR incentive cap.* It is interested in scenarios where:
  - AEMO could increase the cap where it sees a benefit from doing so, for example by seeking additional funding from jurisdictions or other organisations.
  - A jurisdiction approaches AEMO to provide a conditional 'top-up' to the cap to incentivise more participation.

Sequencing the VIM with the IPRR commencement date

AEMO's view is that it expects IPRR participation to be low until incentive arrangements are in place. Stakeholder feedback to the IPRR HLIA also reflected this understanding. Stakeholders noted that first-round incentives should be awarded well in advance of the commencement date to provide investment certainty for prospective VSR Providers (VSRPs) and support VSRPs' customer acquisition, technical development and testing.

VIM implementation costs

AEMO estimates VIM costs to be around $5.0 million +/- 40% in establishing, administering and reporting on the mechanism, including ongoing costs. This cost is in addition to the indicative upfront ($18.2m +/-40%) and ongoing costs (approximately $10.5m over 10 years) supplied in the Scheduled Lite rule change proposal. Final costs will be dependent on the design encompassed in the final rule determination and key cost drivers will include the level of complexity associated with registration, portfolio management and dispatch functionality.

The VIM cost estimate is caveated: further unanticipated implementation costs could arise as a result of the *VSR incentives procedure*s consultation process or during system design and development. The estimate assumes

[1] *VSR benefits* are the expected benefits to consumers of VSRs participating in central dispatch, including where the participation results in reduced system security services costs, avoided generation, avoided greenhouse gas emissions and reduced RERT costs.

that AEMO would run two to five tenders. It is based on costs for a similar sized tendering process with adjustments for the additional VIM components, including:

- New procedure development and consultation
- Calculation of VSR benefits
- Updates to and certification of the NEM settlements systems and processes to manage:
  - Calculating and making participation payments to successful VSRPs
  - Calculating and recovering costs for establishing, administering and reporting on the VIM through NEM participant fees
  - Calculating and recovering costs for participation payments.
- Annual reporting and completion of incentive period reporting
- Change management.

The most significant components of running the VIM are establishing the tender process and documentation, updating and certifying the NEM settlement system, and developing the VIM procedures.

Timeline

For the draft HLIA, AEMO developed an indicative timeline showing how the elements of the IPRR draft rule could be implemented and sequenced for the proposed Thursday, 5 November 2026 IPRR commencement date. This work revealed:

- IPRR commencement day should be a Sunday to align with the start of the NEM settlement billing week. Commencing IPRR on any other day of the week would increase design and development complexity, leading to increased implementation costs. This is because there would need to be a 'settlement transition week' to accommodate the first part of that week being based on pre-IPRR settlement processes and the later part of that week being based on IPRR settlement processes.
- AEMO considers November 2026 to be the earliest feasible commencement date for IPRR, based on the following assumptions:
  - IPRR final rule does not change significantly from the IPRR draft rule
  - IPRR final rule is determined in December 2024
  - Further clarity is provided in the IPRR final rule on key elements of the VIM (as described above)
  - Sufficient participants choosing to participate in industry testing
  - AEMO would need to deliver the reform with no schedule contingency
  - Other reforms are delivered to current 'NEM reform implementation roadmap' timelines, so that AEMO and industry resourcing/scheduling is not compromised.

- However, based on stakeholder feedback and its own analysis, AEMO's strong preference is for a May 2027 IPRR commencement date unless:
  - The VIM or other incentive mechanism can be delivered much earlier to support and provide certainty to early adopters. For the VIM, this would require more detailed definition in IPRR rule (as noted above), and
  - There is a strong indication that prospective VSRPs will be ready for the one-month test window. This is so that AEMO's and participants' technical solutions would have undergone sufficient industry testing prior to rule commencement.
- A May 2027 IPRR commencement date would:
  - Provide more time for VSRPs' customer acquisition, technical development and testing
  - Allow AEMO to have reasonable contingency in its schedule.

Other Considerations

Interaction with Unlocking CER Benefits rule change

The final determination for Unlocking CER Benefits highlights the rule as an enabler for IPRR participation, providing the ability for customers to participate in dispatch mode with their flexible resources independent of their passive load if they wish. AEMO considers that the IPRR final rule may require some aspects of the Unlocking CER Benefits rule drafting to be reviewed. In particular, the drafting does not allow for a secondary settlement point to be established where the connection point has a scheduled resource (NER 7.2.6(b)(2)(i)). The AEMC may wish to consider whether this clause restricts the establishment of secondary settlement point arrangements for NMIs nominated into VSRs, as VSRs are defined as a scheduled resource.

Treatment of VSR load and conditions of supply scarcity

AEMO understands that the AEMC's intent is that VSR load bid in at the market price cap is to be treated as a load requirement, given that VSRs may include passive consumer load that should be able to consume up to, and including, the point of rotational load shedding under conditions of supply scarcity, similar to how other non-scheduled consumer load is treated. As such, VSR load bid in at the market price cap that is subject to rotational load shedding would be considered unserved energy (USE) for the purposes of the reliability standard. AEMO is considering how to implement these outcomes as part of its HLIA process.

Accommodating transmission-connected qualifying resources

Stakeholders have identified examples of transmission-connected qualifying resources that would be suitable for IPRR participation. The IPRR final rule should accommodate transmission-connected unscheduled price-responsive resources, including revising IPRR draft rule 3.10A.3(b)(5)(vi) to expand the requirement to establish data sharing arrangements with distribution network service providers to also include transmission network service providers.

Managing the IPRR procedure changes

The HLIA shows that there will likely be a large number of market procedures that will require minor and/or administrative changes only to accommodate the IPRR rule. For clarity and to lessen the resourcing impact on both AEMO and industry of consulting on these procedure changes, AEMO is seeking a transitional rule to

enable it to make minor/administrative amendments without following the NER process for amending those documents.

A transitional rule of this nature was provided in the 'Integrating energy storage systems into the NEM' rule (NER 11.145.9(c)). In practice for this rule implementation, AEMO:

- Consulted with participants on which market procedure changes would be minor/administrative through the Electricity Wholesale Consultative Forum and the Electricity Retail Consultative Forum
- Provided marked-up versions of the minor/administrative changes in each of those market procedures and provided 2-3 weeks for stakeholders to provide feedback
- Incorporated stakeholder feedback where appropriate into the final updated version of the procedures.

This approach enabled participants to understand and contribute to the minor/administrative changes without needing to engage in a formal consultation process. It was particularly helpful in the cases where there were only terminology changes, or only a single word needed changing in the procedure.

AEMO would follow a similar approach for the IPRR implementation should the option be made available in the IPRR final rule.

Incremental bid size

AEMO supports the AEMC's view on retaining 1 MW as the minimum incremental bid quantity, consistent with the existing bidding process. AEMO acknowledges that a 1 MW increment may pose a barrier to the participation of small aggregators. However, reducing the increment size could have significant implications for NEMDE processing, such as longer solution times due to increased dispatchable unit identifier (DUID) processing and granularity. Moreover, changing the increment size would necessitate costly system upgrades to manage enhanced data granularity and monitoring requirements for Frequency Control Ancillary Service (FCAS) participation. Given these considerations, AEMO proposes retaining the 1 MW increment bid size for the initial implementation phase, with a view to assess its adequacy as participation increases in the future.

VSR framework in NER Chapter 3

AEMO notes that the VSR nomination framework has been established in Chapter 3 rather than Chapter 2 where registration and classification is managed for resources in the NEM. AEMO understands that this provides additional flexibility given that the underlying classification of the connection point remains unchanged when a resource is nominated into a VSR. However, this change may present a challenge for some participants in understanding how the VSR nomination framework fits in with existing registration requirements. The AEMC may wish to consider providing a high-level explainer to support understanding of how these arrangements map together.

Adding VSRs to Schedule 3.1

Under 3.10A.1(f)(2), the draft rule requires VSRPs to provide bid validation data in accordance with Schedule 3.1 relevant to the qualifying resources in their VSRs. AEMO suggests that the AEMC considers adding a section relevant to VSRs in NER Schedule 3.1 outlining the standard data requirements for verification and compilation of dispatch bids for these units.

Attachment 2: Draft HLIA

Draft IPRR High-Level Implementation Assessment

On 2 August 2024 AEMO published its draft IPRR high-level implementation assessment (draft HLIA) to provide an indicative and preliminary view to stakeholders on how the IPRR draft rule may be implemented by AEMO. It outlines the proposed system, data exchange, process and operational changes and the indicative timeline that would likely be required to give effect to the draft IPRR rule, as well as an assessment of impacts to participants.

HLIA purpose

By publishing at an early stage in tandem with the AEMC's draft determination and inviting participant feedback, the draft HLIA is intended to:

- Assist and inform affected participants in developing their own implementation timelines and impact assessments.
- Enable AEMO and participants to plan for this initiative in the context of the broader implementation roadmap (NEM Reform Implementation Roadmap), specifically looking for bundling opportunities, efficient sequencing and to reduce delivery congestion.
- Enable stakeholders to provide input on the early implementation design and timeframes, including whether AEMO's HLIA is consistent with the draft IPRR rule.
- Provide a basis for stakeholders and AEMO to input into the AEMC's IPRR rule change process, including in relation to implementation timeframes.

HLIA feedback

AEMO undertook engagement on the draft HLIA via a public briefing and by seeking written and verbal feedback from stakeholders (including during the August 2024 NEM Reform Delivery Committee meeting). Key themes from stakeholder feedback were:

- There are examples of **transmission-connected** qualifying resources that would be very suitable for IPRR participation.
- **VSR participation modes** are valuable. There was strong support for 'temporary deactivation' and 'hibernation' modes of VSR operation, with supporting examples provided.
- **Zones and thresholds** are critical elements of the IPRR mechanism, and the VSR Guidelines development will be important for defining them.
- Further clarity and communications are needed on how distribution network-level **DOEs** and VSR dispatch interrelate.
- **Portfolio management** is currently a pain point and will need to be uplifted to ensure it is fit for purpose for IPRR. AEMO acknowledges these issues and is committed to improving system usability and capability to appropriately support participants.
- Appropriate implementation **alignment with other reforms** is important. In particular, AEMO and industry should look to bundle IPRR and 'Flexible trading arrangements' procedure development and technical development where it is efficient to do so.

- An **incentive scheme** is important and first-round incentives should be awarded well in advance of the commencement date to:
  - Provide investment certainty for prospective VSRPs
  - Support VSRPs' customer acquisition, technical development and testing.
- Implementation risks should be balanced against the benefits of an early **commencement date**:
  - Delivery risk would be heightened where there is low uptake of the IPRR mechanism by participants. This is because AEMO's and participants' technical solutions may not have undergone sufficient industry testing in time for rule commencement.
  - A November 2026 commencement date would limit industry testing to a one-month window. It would be feasible but very challenging for AEMO and industry to complete suitable testing in this timeframe, with no room for slippage.

Updating the HLIA

AEMO made updates to the draft HLIA to accommodate applicable stakeholder feedback. Version 0.2 is attached for AEMC's consideration. AEMO will publish the final HLIA that is adjusted for the IPRR final determination and rule in the weeks following the IPRR final rule's publication, indicatively in February 2025.

Attachment 3: HLIA v0.2

HLIA v0.2 may be accessed at this link: https://aemo.com.au/-/media/files/initiatives/integrating-price-responsive-resources-into-the-nem/iprr-draft-v02-high-level-implementation-assessment.pdf?la=en