

Consultation on Inter-Network Test Guidelines

Information paper

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Executive Summary

The publication of this Information Paper commences the consultation process (Consultation) conducted by AEMO to consider changes (Changes) which are proposed to the Inter-Network Test Guidelines (Guidelines) for the purpose of the National Electricity Amendment (Integrating energy storage systems into the NEM) Rule 2021 No. 13 (IESS Rule).

AEMO has prepared this Information Paper to inform and initiate feedback by stakeholders about the Changes.

In summary, the Changes include the new terminology to give effect to the IESS Rule.

AEMO invites stakeholders to:

- provide feedback and comments on the change-marked version of the Guideline which accompanies this Information Paper; and
- identify any unintended adverse consequences of the Changes.

Stakeholders are invited to submit written responses by 5pm AEST Friday 16 September 2022.



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1. Stakeholder Consultation Process

AEMO's stakeholder engagement program for the IESS initiative comprises:

- This Consultation.
- IESS Working Group (IESS-WG) for affected participants and other related bodies.
- Discussion with individual stakeholders, as required.
- Dedicated webpage¹ and IESS mailbox (IESS@aemo.com.au) for stakeholder enquiries.
- Additional forums to be established in the second half of 2022 for the broader implementation of the NEM2025 Implementation Roadmap².

AEMO considers the Changes to be minor or administrative in nature. The Changes make the Guidelines consistent with and aligned to the NER, as amended by the IESS Rule.

The changes which AEMO makes to an existing procedure, guideline or other document – including by inserting new NER clauses, updating existing material and providing additional clarity - will generally be considered to be minor or administrative, if those changes:

- 1. do not change the substantive rights or obligations of participants;
- 2. do not require participants to incur any costs or change their systems;
- 3. are not expected to involve material cost for AEMO; and
- 4. are straightforward and not contentious in nature.

Accordingly, under NER 11.145.9(c), AEMO is not required to follow a process for amending the Guidelines which may be specified in the NER. However, AEMO considers it important to request feedback on the Changes, in the interests of transparency.

AEMO's indicative timeline for the Consultation is as follows.

Deliverable	Indicative date
Information Paper and Change-marked Guidelines published	5 September 2022
Submissions due on Information Paper and Change-marked Guidelines	16 September 2022
Final Guidelines published	26 September 2022

Prior to the due date for submissions on the Information Paper, stakeholders can request a meeting with AEMO to discuss any issues in respect of the Changes, or more generally, via email IESS@aemo.com.au.

¹ At https://aemo.com.au/initiatives/major-programs/integrating-energy-storage-systems-project.

² For current version of the Roadmap, see https://aemo.com.au/consultations/industry-forums-and-working-groups/list-of-industry-forums-and-working-groups/reform-delivery-committee.



2. Background

On 2 December 2021, the Australian Energy Market Commission (AEMC) made its Final Determination on the IESS Rule, to integrate storage and hybrid systems into the National Electricity Market (NEM). The IESS Rule takes a significant step toward a technology agnostic two-way market model for the NEM. These changes anticipate, and help prepare the NEM for, the future steps being envisioned through the Post-2025 Market Design initiative of the Energy Security Board (ESB).

To implement the IESS Rule, AEMO envisages:

- Initial Release of new registration and dispatch models on 31 March 2023.
- Final Release to complete the full implementation of the IESS Rule on 3 June 2024.

2.1. Context and overview for this consultation

The Changes include terminology updates for the purposes of the IESS Rule. Specifically, the Guidelines now incorporate the new terminology, where relevant, as introduced into NER Chapter 10 by the IESS Rule.



3. Drafting for proposed changes

To help stakeholders respond to this Information Paper, AEMO has published the change-marked version of the Guidelines which incorporate the Changes.

Submissions on these and any other matters relating to the Guidelines discussed in this Information Paper are invited by 5 pm AEST Friday 16 September 2022.