

From: [Suresh Nanduru](#)
To: [Suresh Nanduru](#), [Suresh Nanduru](#), [Suresh Nanduru](#)
Cc: [Suresh Nanduru](#)
Subject: [NEM Reform ->Stakeholder Resources Guideline Industry Forum \(IPRR\)](#) - Jemena Feedback
Date: Thursday, 20 March 2025 8:05:52 PM
Attachments: [NEM Reform ->Stakeholder Resources Guideline Industry Forum \(IPRR\)](#) - Jemena Feedback

Hi Team,

FYI,

Thanks,



Australian Energy Market Operator
1800 661 300
[aemo.com.au](#)

AEMO acknowledges the Traditional Owners of the land on which we live and work, and we pay our respects to Elders, past, present and emerging.

From: Suresh Nanduru <Suresh.Nanduru@jemena.com.au>
Sent: Thursday, March 20, 2025 4:47 PM
To: NEM Reform <NEMReform@aemo.com.au>
Subject: Voluntary Scheduled Resources Guideline Industry Forum (IPRR) - Jemena Feedback

Hi Team,

Please find the below feedback response related to IPRR initiative.

Section	Question	Participant Comments
3.2	1. What should be the effective date of the VSR Guidelines?	Fine with current initiative timelines
3.3	2. Do the proposals in this consultation paper strike the right balance between ease of participation for VSRs in central dispatch and the need to maintain a secure and reliable NEM power system?	While the rules explain the overall process of VSR and VSRP engagement w.r.t Grid reliability , as DNSP we would like to know detailed information around the Control aspect of CER/VSR and guidelines around the same between the VSRP and DNSP.
3.5	3. How appropriate is AEMO's proposed structure for the new VSR Guidelines?	It will be helpful to have clear roles and responsibilities between DNSP,DSO and VSRP
3.5.1	4. To what extent do you agree with all VSRs, independent of zone, being allocated a loss factor of one?	NA
	5. Other than the NEM zonal classifications presented, what other zonal classifications could be appropriate to use as the basis of VSR zones? What are these and why would they be suitable?	Preference is towards to DNSP boundaries over the larger congestion zones. As considering Congestion zones will increase the complexity around managing NMIs across DB Boundary and other existing process. In terms of generating DOE for each NMI (including FELs and FILs) will be challenging and force to have common format across DBs.
	6. What are the key factors to consider when setting VSR zones now and in the future as the industry gains more experience with and information on dispatch mode?	Growth rate of VSR/VSRP. Security of Data and access to the Data with right level of roles.
	7. How should VSR zones be set to balance cost and ease of participation for VSR with AEMO's need to manage power system security and reliability?	
	a. What are your views on the potential use of NEM regions as VSR zones in the early years of dispatch mode when VSRs are expected to be small with a transition to VSR zones that better support system security as VSRs grow? In this scenario, what would the transition impacts be?	As mentioned in the 3.5.1.5 comments, considering the approach of Congestion Zones will have impacts on DOE generation , format , control, and aggregation of NMIs around the DB boundaries. Need more detailed guidelines and roles/responsibilities for DNSP and VSRPs. Preference is to consider DB boundaries over Congestion zones.
	b. What are the existing or potential issues with having an inconsistent approach to zonal classifications between VSRs and WDRUs?	
	c. What impact/s do DNSPs see from the proposal to use congestion zones as the basis for VSR zones rather than distribution network boundaries?	
	8. Does the selection of VSR zones impact your existing VPP portfolio?	NA
	9. Do you currently have a VPP portfolio that operates across the NEM regions and/or distribution networks?	NA
	10. To what extent do you agree with the requirements, conditions and processes for VSRPs forming VSR aggregations within the proposed zones	NA
	11. Do you agree with AEMO's minimum lead time of six months for a change in zones?	Yes
3.5.2	12. What other factors should be considered in setting the minimum VSR nameplate rating threshold and why?	NA
	13. What are your views on an initial lower VSR nameplate rating threshold that adapts as dispatch mode capability and capacity grows?	NA
	14. What are the options for aggregations of > 1 MW to participate in dispatch mode, given the 1 MW bidding threshold?	NA
	15. Do you have any feedback you would like to provide on the nomination process for a VSR?	NA
	16. What issues do you see with AEMO's requirements for qualifying resources within a VSR or for a VSR?	NA
3.5.3	17. Do you see any issues with AEMO's circumstances where it may request VSRPs that have aggregated qualifying resources to declare individual qualifying resource availability and operating status? What other factors should be considered?	NA
	18. What are your views on the processes and settings AEMO should be established to deal with cases of NMI churn resulting in a VSR dropping below the minimum threshold?	NA
3.5.4	19. Are there any other matters AEMO should consider in relation to the proposed telemetry requirements?	
	20. To what extent does the proposed approach to telemetry appropriately balance between minimising barriers to VSR development and system security considerations?	
	21. To what extent do you agree with AEMO's proposed approach to the:	
	a. Initial capability assessment?	
	b. Periodic capability assessments, including any views you have on the triggers and frequency of such assessments?	
	c. Operational requirements for telemetry and communications equipment for VSR?	
3.5.5	22. Do you agree with AEMO's notice periods for switching between VSR participation modes	
	a. Are you able to provide examples of how the proposed notice periods may impact your participation in IPRR?	NA
	b. Are there any other considerations AEMO should include in setting its notice periods and information requirements?	Yes
	23. Do you agree that VSR can only switch between modes on a per day basis, rather than per time intervals within the day?	
	24. Do you agree with the notice information requirements that AEMO proposes?	
3.5.6	25. Do you have any suggestions on AEMO's plans to incorporate VSR bidding into its existing BDU bidding processes, or any other comments on AEMO's proposals for bid validation?	
3.5.7	26. What information do you think it would be useful for AEMO to include in the Guidelines on NEMDE processes to support prospective VSRPs?	
3.5.8	27. Do you have any suggestions for how AEMO should update its processes to allow VSR to submit dispatch bids and receive dispatch instructions	Preference is to notify through some interface where there is a visibility to DNSP about the involvement of VSR which will help in recalculating the DOEs
3.5.9	28. To what extent does AEMO's proposed approach to dispatch conformance appropriately balance ease of participation with the secure operation of the power system?	
	29. What other factors should AEMO consider in setting dispatch conformance requirements and parameters?	As per the current guidelines , there is a statement "AEMO will monitor for repeated incidences of dispatch non-conformance by a VSR that it deems to be unacceptable or a threat to power system security. AEMO will place a non-conformance constraint on the VSR and notify the VSRP it is under a non-conforming constraint until the VSRP advises AEMO that they can meet their dispatch instructions"
	a. Do you have any views on what a reasonable error trigger would be to use in the context of the size of VSRs, or in how AEMO should approach setting this trigger?	Is there any discussion or workflow for passing this non-conformant VSR or related Flag DNSP ? Do DNSP need to Consider this during DOE calculation ?
3.5.10	30. What are your views on the metering requirements proposed by AEMO for qualifying resources in a VSR?	
3.5.11	31. Is AEMO's explanation of the settlement and NECR arrangements for VSR across the participation modes useful information to be included in the VSR Guidelines?	NA
3.5.12	32. Do you have any recommendations on the content or processes by which AEMO will adjust its prudential assessments for VSRPs and their VSR?	NA
3.5.13	33. What data do DNSPs, and where relevant TNSPs, reasonably believe they will require from VSRPs or AEMO and for what purpose/s?	
	34. Do DNSPs/TNSPs prefer which AEMO system or process they receive data from, or are there alternative ways this data could be provided	Preference is to know the changes in the VSR/VSRP/Zone level as near real time as possible to DNSP to assist in network assessment.
	35. From the prospective VSRP perspective, are there any privacy concerns related to the sharing of NMIs within a VSR with DNSPs and where relevant TNSPs?	NA
	36. What confidentiality concerns do you have regarding the disclosure of data from VSRPs or AEMO with DNSPs and TNSPs (as applicable)?	NA
	37. Do you see any issues with the other processes for the disclosure of data collected by AEMO from VSRPs to DNSPs and TNSPs (as applicable)?	
3.6	Are there any other matters AEMO should consider as part of the development of the VSR Guidelines?	

Regards,
Suresh Nanduru

From: NEM Reform <NEMReform@aemo.com.au>
Sent: Tuesday, 18 March 2025 1:30 PM
Cc: NEM Reform <NEMReform@aemo.com.au>
Subject: RE: Stakeholder Forum | Voluntary Scheduled Resources Guideline Industry Forum (IPRR)

Dear Stakeholder,

This is a friendly reminder that AEMO invites feedback on the development of the Voluntary Scheduled Resource Guidelines [consultation paper](#).

Please provide your submission via volreform@aemo.com.au by **Thursday 20 March**.

In addition, during the [VSR Guidelines industry forum](#) some stakeholders asked if AEMO could provide maps of the different zone configurations to help stakeholders better understand the zone option trade-offs. There were also some questions raised regarding the different zone classifications that have been considered in the comments below.

ZONE CLASSIFICATION	SOURCE	COMMENT
Congestion zones	VSR guidelines - Consultation paper	Note that there are 17 existing congestion zones and the map of proposed zones includes amalgamations, where feasible, to bring down the total to 13 zones.
Load forecasting areas	AEMO's Load forecasting response	Note that the procedure provides the load forecasting boundaries.
Distribution network areas	AEMO's State of the Energy Market report 2024 figure 3.1 on page 49	Stakeholders in the VSR Guidelines consultation paper forum wanted comparison of distribution network areas against the congestion modelling zones. We are working on a schematic to support stakeholders to compare the boundaries, likely available for the draft VSR Guidelines stage. AEMO is keen to hear from DNsPs (via the VSR Guidelines consultation) on the impacts they see from the proposal to use congestion zones as the basis for VSR zones other than distribution network boundaries.
RIZs	AEMO's April 2024 ASM Issue 2 figure 4.5 on page 144	Note that RIZ could not support VSR zones because they do not provide sufficient geographic coverage of unscheduled price-responsive resources.
SP sub-regions	AEMO's April 2024 ASM Issue 2 figure 4.7 on page 179	<ul style="list-style-type: none">Stakeholders of the VSR Guidelines forum requested publication of the allocations to SP sub-regions. Currently, this is not mapped to the SP sub-regions.Note that SP sub-regions were created for modelling purposes only - to calculate least cost augmentation and generation options for the SP's 20- to 30-year outlook. SP sub-regions cannot be used as zones that support the operational requirements of IPRR, including congestion management.

Regards,

NEM Reform Program



Australian Energy Market Operator

volreform@aemo.com.au

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-----Original Appointment-----

From: Ulrika Lindholm **On Behalf Of** NEM Reform

Sent: Tuesday, 10 December 2024 11:03 AM

When: Friday, 26 February 2025 10:00 AM-11:30 AM (UTC+10:00) Canberra, Melbourne, Sydney.

Where: Microsoft Teams Meeting

Microsoft Teams [\(need help?\)](#)

[Join the meeting now](#)

Meeting ID: 411 977 802 343

Passcode: 4CgBuA3C

Join on a video conferencing device

Teleport key: <https://aem0n.zoom/join>

Video ID: 133 609 713 9

[More info](#)

For organizers: [Meeting options](#)

Regards,

NEM Reform Program



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