

Consultation Notice

VIOTAS

Sandbox trial waiver application

March 2026

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Inquiries about this publication should be addressed to:

Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601
Email: aer inquiry@aer.gov.au
Tel: 1300 585 165

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Version	Date	Pages
1	10 March 2026	10

1 Introduction

The Australian Energy Regulator (AER) has established the Energy Innovation Toolkit (also referred to as 'regulatory sandboxing'); a function that aims to help energy innovators and start-ups navigate complex regulatory frameworks and enable the trial of new products and services that will deliver greater choice and cheaper energy options for consumers.

The Energy Innovation Toolkit framework facilitates trials of innovative projects in part by giving the AER a power to issue trial waivers. A trial waiver temporarily exempts an innovator from having to comply with specific rules that are acting as regulatory barriers to allowing an innovative trial project to proceed. As part of its consideration of trials, the AER is required to publicly consult on the proposals it receives.

VIOTAS (the trial proponent), a Demand Response Service Provider, lodged an application for a trial waiver with the AER through the Energy Innovation Toolkit on 19 December 2025. A copy of this application is included with this Consultation Notice at Attachment A.

1.1 Proposed trial

VIOTAS, a global company providing demand response services to commercial and industrial (C&I) energy consumers, seeks a trial waiver from the AER to enable participation in the Wholesale Demand Response Mechanism (WDRM) of loads that have multiple, electrically interconnected connection points. Currently, only large C&I sites with one connection point to the grid are eligible to participate in wholesale demand response.

Specifically, VIOTAS seeks a trial waiver of up to 5 years from clause 2.3.6(m)(1)(i) of the National Electricity Rules (NER), which prohibits participation in the WDRM of loads which have multiple, electrically interconnected connection points. Through the proposed trial, VIOTAS seeks to enable greater WDRM participation with loads from up to 20 trial sites (all large C&I customers) which have multiple connection points to the grid. The specific number and type of sites, which are yet to be determined, may be located in New South Wales, Queensland, South Australia, Tasmania and Victoria.

A full copy of VIOTAS' application is included at Attachment A.

1.2 Purpose of consultation

The AER has reviewed the application and considers that it complies with the information and eligibility requirements, and that the proposed trial project could not be carried out satisfactorily without a trial waiver.

The AER does not consider the application to be misconceived or lacking in substance and the waiver has now progressed to the consultation stage.

It is a requirement under clause 8.16.3 of the NER that the AER carry out public consultation in relation to a proposed trial waiver, unless the AER is satisfied that the proposed waiver is unlikely to have an impact on other registered participants, or is unlikely to have a direct impact on retail customers other than those who provide explicit informed consent to participate in the trial project.

Additionally, issues or concerns raised through consultation may also inform the final design of the trial waiver, including conditions, reporting requirements or other obligations.

With this consultation paper, the AER now seeks stakeholder views on whether the trial waiver application meets the innovative trial principles¹ and if there are additional considerations to be taken into account.

1.3 Confidential information

To facilitate an informed and transparent consultative process we prefer all submissions to be publicly available. The AER will treat all submissions as public documents unless otherwise requested, and blanket confidentiality claims generally will not be accepted.

Parties wishing to provide a submission that contains confidential information are requested to:

- clearly identify the information that is the subject of the confidentiality claim, and provide reasons for the claim; and
- provide a separate, non-confidential version of the submission in a form suitable for publication.

The AER does not generally accept blanket claims for confidentiality over the entirety of the information provided and such claims should not be made unless all information is truly regarded as confidential. The identified information must be genuinely of a confidential information and not otherwise publicly available.

The AER recognises that the disclosure of confidential commercial information in respect of a business may have a substantial adverse effect on the interests of that business. However, trial waivers may also substantially affect other parties (such as access seekers or competitors), and some disclosure of information may be necessary for open and transparent decision-making.

1.4 Next Steps

Questions about and submissions to this consultation should be lodged at the following email address: regulatorysandbox@aer.gov.au by Friday 10 April 2026.

Following consultation, the AER will consider submissions and any concerns or issues raised. Where necessary, further information may be sought from the project proponent.

Following this, the AER will make and publish a formal decision. Depending on this outcome, the AER will provide details on the final waiver as outlined in clause 4.8 of the [Trial Projects Guidelines](#).

¹ The AER must have regard to the eligibility requirements (specified in the National Energy Rules) and innovative trial principles (specified in the National Energy Laws) when considering whether to grant a trial waiver. For more information see 1.3 – How we assess waiver applications below.

2 Initial consideration under cl. 8.16.2

The WDRM is a relatively recent addition to the NEM and commenced operation on 24 October 2021. The WDRM is currently the only market mechanism in the NEM wholesale market that facilitates demand response, that is, payment for reducing load. It allows entities other than the primary retailer to participate directly in the electricity market, by permitting demand response service providers to offer demand response as a service into the NEM, where it can be dispatched in the same way as generators.

The WDRM enables electricity users to help balance the power grid by using less electricity when prices are high. The WDRM lets big users reduce their usage and get rewarded for it. The idea behind the WDRM is that demand response can help lower prices and keep the grid stable during peak times, which benefits all electricity consumers.

Currently, the WDRM is limited to large C&I sites with a single grid connection point. This restriction exists to prevent load shifting, a form of "gaming" the system. As the WDRM pays participants for a "non-event", i.e. energy not consumed relative to a calculated baseline, accuracy is very important. For example, if a site has two connection points but only registers one for the WDRM, it could simply shift its power usage to the second point during a high-price event. In this scenario, the site receives a payout for "reducing" demand at one point while its total (aggregate) load remains unchanged. So, if a site load has two connection points, for example, powering air conditioning in a large area, but only connection point one is registered for WDRM, then demand at the non-registered connection point may increase to offset the reduced load on the other point. This means aggregate load has shifted, rather than reduced.

In 2025, the Australian Energy Market Commission (AEMC) [reviewed the WDRM](#) as required under the NER, and made two key recommendations:

- 1) WDRM should continue operating.
- 2) [Expanding eligibility under the WDRM](#) rule change request made by Enel X on 14 April 2022 should be initiated.

The AEMC also noted the WDRM has contributed to downward pressure on wholesale prices, with average price savings of \$27.83/MWh during WDR dispatch. AEMC analysis estimates that between October 2021 and June 2025, the WDRM has resulted in \$5.32 million (\$1.42m per year) of dispatch efficiency benefits as well as additional emissions reduction benefits. This is higher than the estimated benefits in the draft report and shows the WDRM is providing efficiency benefits greater than its operational costs of \$0.35m - \$0.5m per year.

Recommendation two relates to a rule change request submitted by Enel X regarding participation of sites with multiple connection points in WDRM. The AEMC notes this recommendation does not advocate for the proposed rule change, only that the request should be fully assessed. The AEMC anticipates initiating this rule change in May 2026.²

² [AEMC 2025-2026 Work Plan](#)

VIOTAS' trial waiver application relates to, although takes a different approach, to Enel X's rule change request. This is discussed further in section 2.1.

VIOTAS' proposed trial seeks to allow sites with multiple connection points to access the WDRM under the NER. VIOTAS proposes that a site requires all connection points to be served by the same Market Customer (or Financially Responsible Market Participant (FRMP)) and the same Demand Response Service Provider, and that all connection points at the same site must participate in the WDRM.

VIOTAS considers that larger sites are more likely to have multiple connection points. VIOTAS posits that larger sites are also more likely to have well-maintained assets and the necessary on-site skills for effective market participation. This means that, currently, the sites with the ability to contribute the most volume to WDRM are being excluded. VIOTAS seeks to test whether take-up of WDRM could increase significantly, and that participation of sites with multiple connection points will require no or minimal AEMO systems changes.

The AER considers that the timing and outcomes of this trial may well align with progression of Enel X's rule change request. If successful, the trial may generate learnings to help AEMO work out what systems changes may be required, which will be useful should there be a permanent rule change in the future. VIOTAS has included an appropriate trial exit strategy.

2.1 Differences between the proposed VIOTAS trial and the Enel X rule change proposal

VIOTAS' proposed trial aims to demonstrate that sites with multiple, electrically interconnected connection points can successfully participate in WDR without the need for significant or costly changes to AEMO systems, to associate the load's connection points with each other to allow for data aggregation. This is where the trial differs from Enel X's proposed rule change, which would require some types of aggregation.

Proposed baseline methodologies

Enel X's rule change request proposes that the load for all connection points at a site would participate in WDRM on an aggregate basis. That is for baseline eligibility, baseline compliance and settlement purposes the load at each connection point would all be treated on a whole-of-facility basis.

Changes to AEMO's baselining and settlement systems would be needed to facilitate Enel X's aggregate approach as opposed to the current per connection point basis.

VIOTAS' trial waiver application proposes that the National Metering Identifiers (NMIs) representing the connection points at a site are assessed independently, rather than on an aggregate basis. Its proposal provides modelling to show that this results in an immaterial difference to baselining calculated on an aggregate basis (for the specific site under consideration). As such, VIOTAS' proposal could be implemented with minimal AEMO system changes given that it aligns with the current approach to WDR.

Dispatch

Multiple NMIs in VIOTAS's proposed site/s could be aggregated as one WDR Unit in dispatch without a system change. Enel X is proposing for the sites to be aggregated in all systems/processes, so equally no system change needed for dispatch purposes.

Proposed site(s) for participation

The VIOTAS trial will focus on simple multiple connection point site configurations, and sites not located within embedded networks, which may differ to the broader range of sites that may be eligible for participation in WDR under Enel X's proposed rule change.

For example, one site proposed by VIOTAS is one of the simplest multiple connection point site configurations available. That is, the site only consists of two connection points that are electrically connected. The simplicity of at least one of the VIOTAS sites assists in facilitating its proposal and is a good example of the types of sites that may otherwise be good candidates for WDR, but are not eligible due to the NER exclusion of sites with multiple connection points.

Conditions

To reduce potential risks, VIOTAS proposes, if granted, to accept additional conditions on these loads for participation. VIOTAS is of the view that changes to AEMO's existing WDRM systems are not required. These additional conditions would include that all the load's connection points are to be registered for WDRM, registered by the same Demand Response Service Provider, and share the same Market Customer or retailer. These conditions are in line with the Enel X 2022 rule change proposal.

3 Questions for consultation

The AER seeks comments on all aspects of the trial waiver application, including on how the application addresses the innovative trial principles and if the trial project is likely to contribute to the achievement of the National Energy Objectives.³ A summary of these principles is available at [this link](#). Views put forward by stakeholders will form part of the substantive assessment of the application which the AER will undertake after consultation is complete.

In addition to any general feedback provided on the trial waiver application, the following questions are separately included as additional points, for which the AER is particularly interested in stakeholder views.

3.1 Contribution to regulatory and industry experience

The aim of the trial project is to demonstrate that energy consumer sites with multiple, electrically interconnected connection points can successfully participate in WDR without significant changes to AEMO systems.

The stated objectives of the trial project are to:

- test the suitability of the proposed approach on existing AEMO systems.
- provide AEMO with learnings to support the inclusion of sites with multiple, electrically interconnected connection points.
- provide AEMC with learnings to inform the upcoming consultation on the related Enel X rule change proposal.
- increase participation in WDRM leading to reduced wholesale energy prices to benefit energy consumers generally.
- avoid costs for systems change.

VIOTAS proposes that the success criteria for the trial project are:

- accelerate uptake in the WDRM. Successfully register at least two multiple connection point sites for WDRM, meeting all the current eligibility criteria and additional trial conditions (i.e. a site requires all connection points to be served by the same Market Customer (or FRMP) and the same Demand Response Service Provider, and all connection points at the same site must participate in the WDRM.)
- analyse the registration eligibility assessment, comparing the proposed approach to the approach requiring aggregation, and share these findings with AEMO.
- actively participate in the WDRM market, with a dispatch event occurring for each participating site.
- obtain post-dispatch performance and settlement data, comparing the proposed approach to the approach requiring aggregation and share these findings with AEMO.

Following WDR dispatch events, reports will be produced comparing performance and settlement based on the trial methodology, and the more complex formal rule change

³ See the National Electricity Objective in section 7 of the NEL; the National Gas Objective in section 23 of the NGL; and the National Energy Retail Objective in section 13 of the NERL.

methodology. A summary of these learnings will be shared with AER and AEMO, with VIOTAS proposing to report to the AER biannually for the first two years of the trial, and annually thereafter on the trial's progress.

Question 1: Are there any views or comments on how this trial contributes to the development of regulatory and industry experience?

Question 2: As explored in section 2.1, do stakeholders consider this trial could support the AEMC's consideration of Enel X's proposed rule change?⁴

3.2 Competition

When taking into consideration whether to grant a trial waiver, the AER has regard to the innovative trial principles as outlined in clause 4.2 of the Trial Projects Guidelines. Of these innovative trial principles, clause 4.2.(xii) includes whether the trial project may impact on competition in a competitive sector of the market.

The trial may increase broader energy market competition by allowing currently excluded multiple connection C&I sites to participate in the WDRM to provide an alternative to retailer demand response programs of the national electricity market.

VIOTAS notes that allowing participation in WDRM provides an alternative to retailer demand response programs and so increases competition.

While the trial could provide a commercial advantage to VIOTAS in that it could register large sites currently ineligible for demand response, it is limited by trial conditions and scope, including its time limit. Additionally, there are reporting and other conditions placed on VIOTAS as part of the trial which need to be self-funded by VIOTAS. The learnings of this trial may allow more parties to offer WDRM to sites with multiple connection points in the future.

Question 3: How do stakeholders consider this trial may impact competition?

3.3 Site selection

During this trial, VIOTAS will contract and engage with organisations in the commercial and industrial sector (with consumption greater than 10GWh/yr) within the NEM. VIOTAS proposed that the trial is limited to 20 sites.

No embedded networks or residential electricity consumers will participate in this trial. An updated or latest version single line diagram (SLD) will be provided for each participating site.

The specific C&I sites and WDRM loads to be identified by VIOTAS will be shared with the AER and AEMO, but are confidential due to commercial reasons. This may limit public learnings. A condition of the trial could be to require VIOTAS to share at least the characteristics of the sites publicly that will be involved with the trial (e.g. number of

⁴ [AEMC Ref: ERC0345](#)

connection points, some location details, or type and size of the sites). VIOTAS expects to focus on high voltage C&I sites, such as data centres and water utilities, and has ruled out some sites from this trial, such as embedded networks. Example sites could include data centres with two or four connection points, or a water treatment facility with two connection points.

Question 4: Which sites do stakeholders consider are or are not appropriate to trial under this proposal?

3.4 Trial conditions and safeguards

One of the key risks of allowing sites with multiple connection points to access the WDRM is the risk of ‘gaming.’ If a site has multiple connections, it may be possible to gain an advantage across the sites. This is because if a site has multiple connection points but does not register each site to participate in the WDRM, it could simply shift its power usage to alternate (non-registered) points during a high-price event.

A key mitigation of this risk is to ensure that there is ‘whole plant capture’. This means that every single connection point is appropriately captured for WDRM purposes. One way to achieve this is for VIOTAS to supply AEMO with up to date ‘single line diagrams’ at the point of registration, to ensure all connection points are captured. Another potential way of checking this is possibly with some form of Network Service Provider verification.

Question 5: What do stakeholders consider is the most appropriate way to appropriately capture all connection points by WDRM, to ensure there’s no risk of gaming?

Question 6: Are there any other risks with this trial, or any other conditions that may need to be included to mitigate any risks to third parties (e.g. retailers) or the system operator?

Attachment A – Trial Waiver Application

Attachment B – VIOTAS Desktop Analysis

WAIVER APPLICATION

Summary

ID	SBX-0000191		
Title	SBX-0000191 - Trial Waiver Application - VIOTAS		
Submitting User	[REDACTED]		
Job Title/Position	Market Operations Manager		
Initial Submission Date	19/12/2025 12:00 AM	Latest Submission Date	27/02/2026 11:34 AM
I have read, understood and agreed to the Legal Disclaimer			Yes
I have read, understood and agreed to the Consent to Information Sharing Statement			Yes
I have read, understood and agreed to the Privacy Statement			Yes

Organisation

ABN	[REDACTED]
ACN (if applicable)	[REDACTED]
Organisation Name	VIOTAS AUSTRALIA PTY LTD
Information about the type of organisation applying for a trial waiver (i.e. whether the applicant is a private limited company, partnership, trust, or joint venture etc.)	VIOTAS Australia Pty Ltd is an Australian Private Company.

Organisation Business Address

Address line 1	Level 26
Address line 2	360 Collins St
City/Suburb	Melbourne
State/Territory	VIC
Postcode	3000

Is the applicant's postal address the same as the business address? Yes

Organisation Postal Address

Address line 1
Address line 2
City/Suburb
State/Territory
Postcode

Contact Details

Organisation website <https://viotas.com/>
Name of contact [REDACTED]

NOTE: some questions may appear in in this PDF that were not presented to you in the application process. Questions will differ depending on whether you are applying to the AER or ESC for a trial waiver. Responses to questions not presented to you will be left blank.

Contact role Market Operations Manager
 Contact telephone [REDACTED]
 Contact email [REDACTED]

General Information

Previous Engagement

Has the applicant previously engaged with the Energy Innovation Toolkit on this matter? Yes
 Has the applicant previously engaged with the AER or ESC regarding a trial waiver? AER

Applicant Licence and Exemptions

Does the applicant hold any licences or exemptions to hold a licence to operate in the electricity and/or gas industry? No
 If so, is it a licence, an exemption or both licence(s) and exemption(s)?
 Licence(s) held
 Exemption(s) held

AEMO Registration

Is the applicant registered with the Australian Energy Market Operator as a market participant? Yes
 If so, which categories? Demand Response Service Provider
 If the applicant is intending to register, provide details of the registration or inquiries made. If the applicant is not intending to register with the Australian Energy Market Operator, please provide a reason.

Parent Licences and Exemptions

Does the applicant's parent company or company group hold any licences or exemptions from having to hold a licence to operate in the electricity and/or gas industry? No
 If so, is it a licence, an exemption or both licence(s) and exemption(s)?
 Licence(s) held
 Exemption(s) held

Previous Licence Suspensions and Cancellations

Has the applicant or their parent company previously held a licence that has been suspended or cancelled? No
 Suspension/cancellation details
 Has the applicant, any directors of the applicant, any related body corporate, or any person with significant managerial responsibility or influence on

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the applicant been involved in any material breaches of obligations regulated by the commission or any other regulator?

If yes, please provide details

Is the applicant, any directors of the applicant, any related body corporate, or any person with significant managerial responsibility under investigation in relation to its regulatory obligations?

No

If yes, please provide details

Partner Organisations

Are you submitting an enquiry on behalf of a third-party, or is the applicant proposing its innovation to be delivered in partnership with other organisation(s)?

No

Provided Organisation Details (if any)

Project Description

Overview

Description of the applicant's project, including if the innovation is a product, service, new business model or other

VIOTAS Australia is a demand response aggregator, offering FCAS and energy services to all regions of the NEM. Our customers include commercial and industrial energy users and we work with various customer assets including flexible consumption, generation, battery and solar. VIOTAS is a registered participant of the WDRM. We support the continuation and growth of the scheme and hope that this Sandbox trial will support this.

VIOTAS is applying for a trial waiver in relation to clause 2.3.6(m)(1)(i) of the National Electricity Rules to allow loads which have multiple, electrically interconnected connection points to participate in the WDRM. The trial imposes additional conditions on these loads for participation but proposes that changes to existing WDRM systems are not required.

In its October 2025 review, the AEMC found that the WDRM does play a useful role in the NEM, and as “the only market mechanism in the NEM wholesale market that facilitates demand response” it is a necessary and important part of two-way markets. EPR0099 - Review of the WDRM - Final report .

Uptake in the WDRM has lagged expectations. One reason is that clause 2.3.6 (m)(1)(i) of the NER currently prevents participation by sites with multiple, electrically interconnected connection points. This clause may have been included to address concerns about potential ‘gaming’ (for example, a site switching load between its connection points and not actually reducing consumption as a whole). In 2022, Enel X

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proposed a rule change (Expanding eligibility under the WDRM | AEMC) to allow these sites to participate in the WDRM on the basis that AEMO would need to “allow for aggregation of data for loads... for the purposes of baselining and settlement”. The assumption was that to avoid gaming, AEMO would need a way to associate the site’s connection points with each other, and this would likely be via an AEMO systems change. This trial waiver seeks to demonstrate that aggregation of a site’s connection points in the system is unnecessary. A desktop assessment has found that baseline, performance and settlement assessments could be performed on an individual connection point or NMI basis (all connection points included) with no material difference to the result compared with when the load’s connection point data is first aggregated before being assessed. The implication is that the NER provision could be removed, and the sites allowed to participate without complex, expensive and lengthy development work to build a technical solution.

Conditions for participation are that all the load’s connection points would be registered for WDRM, registered by the same DRSP (demand response service provider), and share the same Market Customer or retailer. This is in line with the Enel X 2022 rule change proposal. Embedded networks and residential electricity consumers will not be included in this trial. An updated or latest version single line diagram (SLD) will be provided for each participating site.

VIOTAS’s experience with industrial consumers of energy is that larger sites are more likely to have multiple connection points. These larger, more critical sites are also more likely to have well-maintained assets and the necessary on-site skills for effective market participation. This means that, currently, the sites with the ability to contribute the most volume to WDRM are being excluded. Take up of WDRM would likely increase significantly under this proposed trial, as well as avoided systems change expenditure. We look forward to working with the AER team.

Confidential information (if any)

Aims, objectives and success criteria for the applicant's project

The aim of the trial project is to demonstrate that energy consumer sites with multiple, electrically interconnected connection points are able to successfully participate in WDR without the need for changes to AEMO systems to associate the load’s connection points with each other to allow for data aggregation. This is achieved by ensuring the additional conditions of participation are adhered to.

The objectives of the trial project are:

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- Test the suitability of the proposed approach of not requiring aggregation or systems changes for load with multiple, electrically interconnected connection points when participating in the WDRM.
- Providing AEMO with learnings to support the inclusion of sites with multiple, electrically interconnected connection points.
- Providing AEMC with learnings to inform the upcoming consultation on the rule change proposal.
- Increase participation in WDRM leading to reduced wholesale energy prices to benefit energy consumers generally.
- Avoid systems change costs – the proposed approach does not require changes to the existing WDRM dispatch, settlement or retailer billing systems.

The success criteria for the trial project are:

- Accelerate uptake in the WDRM. Successfully register at least two multiple connection point sites for WDRM, meeting all the current eligibility criteria, as well as the additional conditions.
- Analyse the registration eligibility assessment, comparing the proposed approach to the approach requiring aggregation and share these findings with AEMO.
- Actively participate in the WDRM market, with a dispatch event occurring for each participating site.
- Obtain post-dispatch performance and settlement data, comparing the proposed approach to the approach requiring aggregation and share these findings with AEMO.

Confidential information (if any)

Waiver Frameworks

Selected framework(s) for the waiver application Is this confidential?	National Energy Framework False
Selected National laws and/or rules for which the waiver is being sought Is this confidential?	National Electricity Rules (NER) False
Selected Victorian laws and/or rules for which the waiver is being sought Is this confidential?	 False
If Commission Code of Practice, please specify Confidential information (if any)	
If Commission Guideline, please specify Confidential information (if any)	
If Other, please specify Confidential information (if any)	

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Description of the particular provision(s) the applicant is seeking a waiver from

NER 2.3.6

(m)In this Chapter:
 (1)a connection point is a qualifying load if:
 (i)the connection point comprises a single connection point or a parent connection point in respect of all its associated child connection points that are not market connection points;

As per version 236 of the rules, accessed 18 November 2025.

Confidential information (if any)

Purpose and Assets

Why is the trial waiver required to conduct the trial project?

The trial waiver is required to conduct the trial project as the project cannot proceed with the current NER rules in place. Although there is a pending rule change proposal consultation expected to take place in 2026 (Expanding eligibility under the WDRM : <https://www.aemc.gov.au/rule-changes/expanding-eligibility-under-wdrm>), it is not sensible to delay entry to the market for the proposed trial sites as the rule change consultation is expected to take 18+ months and energy consumer benefits could be achieved in the meantime.

Confidential information (if any)

Description of whether the applicant's project will include the installation of new infrastructure or assets

Under the trial waiver metering control devices will be installed at existing C&I facilities to enable participation in WDRM. These devices meet AEMO's requirements for WDRM participation and have passed regulatory and safety requirements.

Confidential information (if any)

Markets and Locations

Description of the applicant's intended audience/customer. How many and what type of consumer will be involved? How does the applicant intend to recruit them?

During this trial, VIOTAS will be contracting and engaging commercially with organisations in the commercial and industrial sector (with consumption greater than 10GWh/yr) within the NEM. It is proposed that the trial is limited to 20 sites. No embedded networks or residential electricity consumers will participate in this trial. An updated or latest version single line diagram (SLD) will be provided for each participating site.

Confidential information (if any)

**Which market/s will it operate in?
 Is this confidential?**

NSW; QLD; SA; TAS; VIC
 False

**Location/s of the applicant's intended customers
 Is this confidential?**

National
 False

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Other location description (if applicable)
Confidential information (if any)

Customers' aggregate consumption at a supply point is or is likely to be More than 160MWh in a year (large customers)
Is this confidential? False

Project Progress

Proposed duration of the trial project (in months or years) 5 years
Is this confidential? False

Stages of the applicant's innovation project that have already been completed Pre-feasibility; Consultation; Financing; Planning or development approval; Market Research; Product Development
Is this confidential? False

Has the applicant previously engaged with any of the following entities about the innovation? Australian Energy Market Operator (AEMO); Australian Energy Market Commission (AEMC); Australian Energy Regulator (AER)
Is this confidential? False

Other entities the applicant has engaged with
Confidential information (if any)

Project Funding

Has the applicant received funding or financing from a third party? No
Is this confidential? False

What sources have approved financial support?
Is this confidential? False

Funding received from specified Government agency and program (if applicable)
Is this confidential? False

Funding received from other financial source (if applicable)
Is this confidential? False

Project Stage

When does the applicant plan to launch its innovation? Less than 6 months
Is this confidential? False

Description of the applicant's business development stage
Confidential information (if any)

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Description of how the trial project will be monitored, reported on and evaluated, include how learnings will be shared

VIOTAS's 24-hour Network Operations Centre will monitor participation in real time.

As a normal part of WDR operations, the site will be regularly assessed by AEMO for performance and compliance.

Following WDR dispatch events, reports will be produced comparing performance and settlement based on the trial methodology, and the more complex formal rule change methodology. A summary of these learnings will be shared with AER and AEMO.

Reporting will be provided to the AER biannually for the first two years of the trial, and annually thereafter. This information will support assessment of the trial's progress towards meeting its objectives and success criteria.

Confidential information (if any)

Eligibility Criteria

Consumer Impacts

Description and identification of the benefits to consumers from the trial project, and how these benefits will be measured

This trial will assist in validating and demonstrating the suitability of sites with multiple connection points to participate in the WDRM. To date, under the existing rules and guidelines, sites with multiple connection points have been precluded from participating in the WDRM. This trial will support opening up the WDRM to more participants, enabling greater demand side participation in the Wholesale Electricity Spot Market and allowing large electricity users to be paid for reducing their consumption during peak demand periods, helping to lower wholesale electricity prices and improve the efficiency and reliability of the power grid.

Confidential information (if any)

Description of how consumers experiencing vulnerability will be supported

This project only targets C&I energy consumers. There are no customers experiencing vulnerability involved in this project.

Embedded networks and residential electricity consumers are not included in this trial.

Confidential information (if any)

Description of how consumer protections will be maintained through the trial

During this trial, VIOTAS will be contracting and engaging commercially with organisations in the commercial and industrial sector (with consumption greater than 10GWh/yr). No residential consumers will participate in this trial. VIOTAS is not entering into a standard or market retail contract and not providing customer connection services. The current protections that safeguard energy retail customers will remain intact, ensuring no alterations to the standard roles and protections

Confidential information (if any)

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Description of how customer privacy will be maintained, including how customer information will be collected, used, managed and disclosed

VIOTAS will only collect and maintain the minimum required customer information to manage participation in the WDRM. This primarily is NMI, site historical electricity consumption, company name, site name, site location, banking and contact details. All customer information will be stored securely. No information will be disclosed unless, and to the extent, expressly permitted by the customer.

Confidential information (if any)

[Redacted]

Risk management

Description of the risk management plan for the proposed trial project

A risk register has already been developed for this project, to help identify risks and their potential mitigation strategies. Throughout the project this would be reviewed, amended and additions made, to assist in the classification and prioritisation of any outstanding risks.

Confidential information (if any)

Description of the risks for other market participants and how these will be mitigated

There are no material risks for other market participants. Please see risk register in supporting files.

Confidential information (if any)

Description of the processes in place to monitor and respond to potential risk events

Desktop analysis and simulated WDR events show no material difference in performance, accuracy, or risk whether NMIs are assessed individually or in aggregate. No evidence of increased risk of gaming or false response. The existing settlement process for WDR will provide a natural sense-check at the conclusion of any price events. In addition to this, VIOTAS will commit to conducting validation checks at the conclusion of any events/series of events.

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The risk management plan will be reviewed periodically and updated based on monitored outcomes, incident investigations, and stakeholder feedback.

Confidential information (if any)

Does the applicant expect there to be any risks to the safety, reliability and security of electricity supply of energy and/or gas as a result of the project? No
Is this confidential? False

Explanation of what these risks are and how those risks will be avoided or mitigated
Confidential information (if any)

If no, why not? No risks to the safety, reliability or security of electricity or supply of energy are expected as a result of this project.

Confidential information (if any)

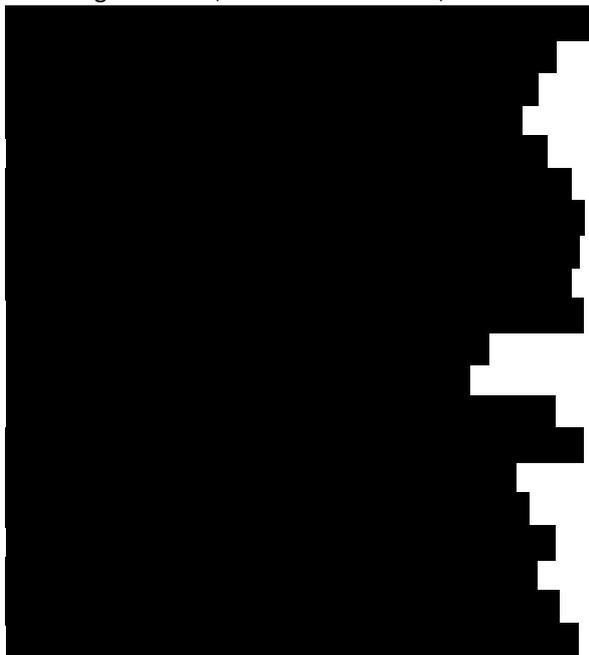
Description of any consultation undertaken with Australian Energy Market Operator, Energy Safe Victoria or any other relevant bodies regarding the proposed trial project and the risk management plan
Confidential information (if any)

Operational capability

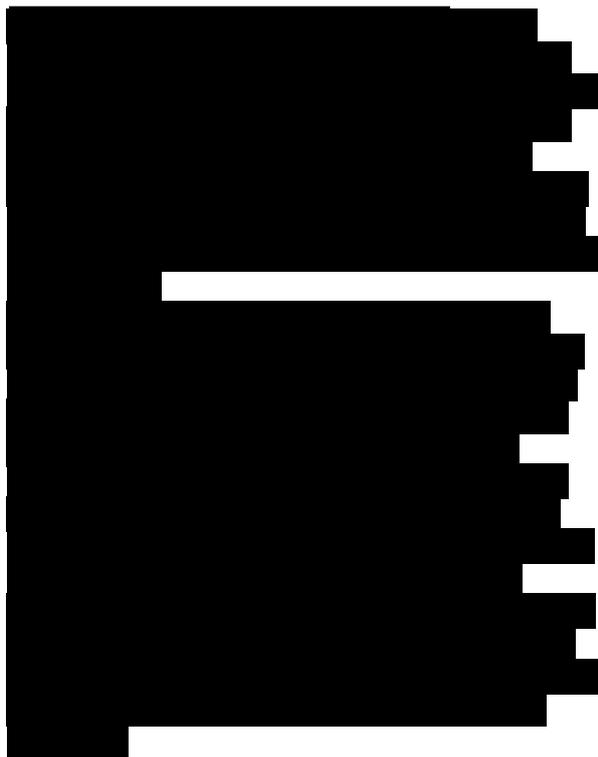
Evidence of the organisation’s operational, technical and financial ability to carry out the proposed trial project

VIOTAS is a global company founded in 2013, with extensive and specialist experience in providing demand response services to commercial and industrial energy consumers. VIOTAS works with commercial and industrial energy consumers across the globe to monetise their flexible energy use, including in Ireland, Australia and Texas, USA.

Confidential information (if any)



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Exit strategy

Description of the trial project closure process and how participating customers will revert to their pre-existing supply arrangements or move onto suitable alternative arrangements that comply with all relevant regulatory requirements after closure of the trial project

The project will close after five years or when WDRM rules evolve to permit sites with multiple connection point to participate in WDRM. Note: There is a rule change under consideration that would permit sites with multiple connection points to participate in the NEM (AEMC Reference ERC0345). This is expected to provide a pathway and enduring solution for ongoing participation in the WDRM for all sites that will participate in this trial. The intent is to continue participation in WDRM for all trial participants under the new rule, when it is finalised and implemented in 2026 or 2027. There is no change to existing supply arrangements as participation in WDRM is separate from, and in addition to, existing electricity supply contracts.

Confidential information (if any)

Consumer protection

Description of how participating retail customers and/or participants will provide their explicit informed consent and how this will be recorded. If it is intended that explicit informed consent will not be obtained, the applicant must explain why this should not be required

VIOTAS will communicate in writing the details of the trial to all potential participants and seek explicit written consent to proceed. To the extent that there are any trial specific requirements, these can be added as an addendum to the standard agreement.

Confidential information (if any)

Description of how participating retail customers and/or participants can raise a dispute in relation to

Like all VIOTAS customers, the trial project participants will have a dedicated account manager

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the proposed trial project and the processes and procedures in place to resolve these, noting this could include recourse to the relevant energy ombudsman

who can be contacted and will ensure that any questions or concerns about the pilot are promptly addressed.

The Dispute resolution scheme has been attached as a Supporting file.

Confidential information (if any)



Description of how trial project participants will have access to the Energy and Water Ombudsman (Victoria)'s dispute resolution services and if the applicant is, or will become a member of the Energy and Water Ombudsman (Victoria)
Confidential information (if any)

Description of how trial project participants can raise a dispute in relation to the proposed trial project if the applicant is not a member of the Energy and Water Ombudsman (Victoria)'s dispute resolution services and if so, what alternative form of external dispute resolution is proposed. Please explain why the applicant considers that approach to be appropriate
Confidential information (if any)

Description of what consultation the applicant has undertaken with the Energy and Water Ombudsman (Victoria) in relation to dispute resolution processes
Confidential information (if any)

Description of how participating retail customers and/or participants can opt out of the proposed trial project or, if it is proposed that customers should not be able to opt out of the trial project or that there should be restrictions on the circumstances in which customers can opt out, the reasons why this should be the case

It is not considered an opt out specific to this trial is necessary or required.

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Confidential information (if any)



Disconnections

Description of the proponent's proposed processes in relation to disconnection where the proposed trial project directly involves the supply or sale of electricity or gas to small customers
Confidential information (if any)

Not applicable. The trial does not directly involve the supply or sale of electricity or gas to small customers.

Development of regulatory experience

Description of how the proponent consider the trial project contributes to the development of regulatory and industry experience

The trial project will contribute to the development of permanent rule changes relating to WDRM eligibility. Learnings from the project are also expected to be applied to the pending AEMC rule change proposal consultation "Expanding eligibility under the WDRM".

Confidential information (if any)

Consultation with other regulators

Has the applicant engaged with the jurisdictional safety regulator on the project?
Is this confidential?

No
False

If no, why not?
Confidential information (if any)

Not applicable for this project.


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**If yes, does the applicant require an exemption, and did the applicant receive one from them?
Confidential information (if any)**

Confidential information

**The commission must consider whether the extent and nature of any confidential information impair the commission's ability to provide public transparency in relation to the conduct and outcomes of trial projects. Provide any comments you consider relevant to this assessment
Confidential information (if any)**

The AER must consider whether the extent and nature of any confidential information impair the AER's ability to provide public transparency in relation to the conduct and outcomes of trial projects. Provide any comments you consider relevant to this assessment

The specific consumers and sites participating in the trial are commercially sensitive and are subject to a confidentially claim. VIOTAS consider that the number of sites and type of industries participating would provide sufficient information to enable public transparency in relation to the conduct and outcomes of the trial. This would provide a balance of disclosure that the trial participants would be comfortable with, that does not reveal that may be commercially sensitive such as the customer portfolio of customers that VIOTAS has in the NEM. VIOTAS will provide all relevant information to AEMO and AER that is required for WDRM market registration and participation.

Confidential information (if any)

Explanation of whether the proponent considers the extent and nature of the confidential information may impair the appropriate development of regulatory and industry experience arising from the trial project

VIOTAS will provide all relevant information to AEMO and AER that is required for WDRM market registration and participation. VIOTAS propose that confidential information relating to specific customers and sites not be publicly shared, however this does not impair the development of regulatory and industry experience arising from the trial project.

Confidential information (if any)

Innovative Trial Principles

Innovative Trial Principles

Explanation of whether the trial project is focused on developing new or materially improved approaches to the use or supply of, or demand for, electricity

The trial project is focused on developing a materially improved approach to the flexible use of the demand for energy. The project widens the eligibility for WDRM participation via simplified entry criteria and

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measurement approach. Flexible demand is unlocked for the benefit of the energy market.

Confidential information (if any)

Explanation of whether the trial project likely to contribute to the achievement of the national electricity objective

The trial project is likely to contribute to the achievement of the national electricity objectives. It promotes efficient use of electricity services (WDR) for the long-term interest of consumers of electricity with respect to price and security of supply of electricity. Where the WDR volume provided replaces carbon-intensive energy supply, it is likely to contribute to reducing Australia's greenhouse gas emissions.

Confidential information (if any)

Explanation of whether the trial project is able to demonstrate a reasonable prospect of giving rise to materially improved services and outcomes for consumers of electricity

The trial project will lead to improved outcomes for consumers of energy as additional supply / reduced demand can be made available to the market, reducing the risk of supply shortfalls and placing downward pressure on wholesale energy prices.

Confidential information (if any)

Explanation of whether the trial project maintains adequate consumer protections, including whether the trial project may involve risks to consumers and (if so), how those risks might be mitigated

Residential and small business consumer protections are not relevant to this trial. The consumers (large C&I sites) participating in the trial are protected in the same manner as a consumer participating in the current WDRM structure. Generally, energy consumers are protected from poor WDRM performance through the same mechanisms as regular WDRM through post-event performance and compliance assessments. Under the trial, additional post-event performance reporting will be undertaken.

Confidential information (if any)

Explanation of whether the trial project is unable to proceed under the existing regulatory framework

The trial project cannot proceed under the existing regulatory framework due to the existence of NER rule 2.3.6 (m)(1)(i) which states that a proposed WDR connection point is a qualifying load if it comprises a single connection point, which the trial project sites are not.

Confidential information (if any)

Explanation of whether the trial project has moved beyond research and development stages but is not yet established, or of sufficient maturity, size or otherwise commercially ready, to attract investment

Desktop research has been undertaken to determine that the project concept is sound. VIOTAS is already a registered provider of WDR services and is otherwise commercially ready to progress. Two potential WDR sites are lined up for participation.

Confidential information (if any)

Explanation of whether the trial project may negatively impact the Australian Energy Market Operator's operation of the national electricity system and national electricity market and, if there are impacts, how those impacts can be mitigated
Confidential information (if any)

The trial project will not negatively impact the Australian Energy Market Operator's operation of the national electricity system and national electricity market.

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Explanation of whether the trial project may impact on competition in a competitive sector of the national electricity market

The trial project will increase competition with retailers in the demand response sector of the national electricity market. Currently, these multiple connection C&I sites are excluded from participating in the WDRM but may participate in retailer demand response programs, if available. Allowing participation in WDRM provides an alternative to retailer demand response programs, and so increases competition.

Confidential information (if any)

National Energy Regulations Additional Principles

Explanation of whether the trial project is able to be trialled and evaluated

The trial project is able to be trialled and evaluated. Participation in the WDRM under the rule waiver can be started and stopped within the trial duration without ramifications. Desktop evaluation has already been conducted, and performance evaluation will be conducted following each WDRM dispatch and shared with AER and / or AEMO as required. Evaluation is quantified using energy consumption data which is verifiable.

Confidential information (if any)

Explanation of whether there is potential for the trial project to be successfully expanded

There is potential for the trial project to be successfully expanded and this is our goal. Expansion during the trial is expected to occur as additional suitable sites are sourced by the proponent. If the trial is successful and rule changes become permanent, expansion would include other participant's sites.

Confidential information (if any)

Explanation of whether the trial project will provide for public sharing of knowledge, information and data resulting from the trial project

VIOTAS will publicly share information which is relevant to the project, whilst maintaining the privacy of the customers involved. Anonymised or summarised data, knowledge and findings will be made available in reports.

Confidential information (if any)

Victorian Specific Requirements

Explanation of whether the trial project is focused, or will it continue to focus, on developing new or materially improved approaches to the use or supply of, or demand for, electricity or gas

Confidential information (if any)

Explanation of whether your trial project is likely to contribute to the achievement of the objectives of the Commission under the Electricity Industry Act 2000 (Vic), Gas Industry Act 2001 (Vic) and the Essential Services Commission Act 2001

Confidential information (if any)

Explanation of whether the trial project will be able to demonstrate, or can it continue to demonstrate, a

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reasonable prospect of giving rise to materially improved services and outcomes for customers who purchase electricity or gas
Confidential information (if any)

Explanation of whether the trial project maintains, or will continue to maintain, adequate consumer protections for customers who purchase electricity and/or gas, including whether the trial project may involve risks to such customers and, if so, how those risks might be mitigated
Confidential information (if any)

Explanation of whether the trial project is unable to proceed, or continue to proceed, because of the Electricity Industry Act 2000 (Vic), Gas Industry Act 2001 (Vic) and/or any instrument made under those two Acts (as applicable)
Confidential information (if any)

Explanation of whether the trial project has moved beyond research and development stages but is not yet established, or of sufficient maturity, size or otherwise commercially ready, to attract investment
Confidential information (if any)

Explanation of if the trial project may negatively impact the Australian Energy Market Operator's (AEMO) operation of the national electricity system and national electricity market or AEMO's operation of systems relating to natural gas (including AEMO's performance of its declared system functions) and markets and auctions for natural gas and how those impacts can be mitigated
Confidential information (if any)

Explanation of whether the trial project is able to be trialled and evaluated
Confidential information (if any)

Explanation of whether there is potential for the trial project to be successfully expanded
Confidential information (if any)

Explanation of whether the trial project will provide for public sharing of knowledge, information and data resulting from the trial project
Confidential information (if any)

Supporting Files

Description	Filename	File Size
Optional supporting material file	SBX-0000191 Approval Letter - VIOTAS Australia Pty Ltd.pdf	116.47 KB
Optional supporting material file	SBX-0000191 Risk Management.pdf	333.6 KB

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Optional supporting material file	SBX-0000191 Financial resources.pdf	51.09 KB
Optional supporting material file	SBX-0000191 Statutory declaration.pdf	261.86 KB
Optional supporting material file	SBX-0000191 Dispute resolution.pdf	364.21 KB
Optional supporting material file	SBX-0000191 Technical Capacity.pdf	51.25 KB
Optional supporting material file	SBX-0000191 Diagram corporate structure and organisational chart.pdf	155.93 KB
Optional supporting material file	WDR multiple connection points - AER Sandbox - 2025 10 08.pdf	334.51 KB

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**WDR multiple
connection point sites**

**AER Trial Waiver
Sandbox**

October 2025

VIOTAS



VIOTAS
Pioneering Gridware Technology

What is the problem to be addressed?

WDR Requirement for registration

AEMC National Electricity Rules

Currently, the NER rules prevent a site from participating in WDRM if it comprises multiple, electrically connected connection points. See 2.3.6 (m) (1) (i).

This impacts most larger consumer sites, i.e. industrial customers such as data centres or manufacturing facilities.

Chapter 2

Registered Participants and Registration >

Rule 2.3

Connection point and connected plant ... >

Clause 2.3.6

Wholesale demand response units

(m) In this Chapter:

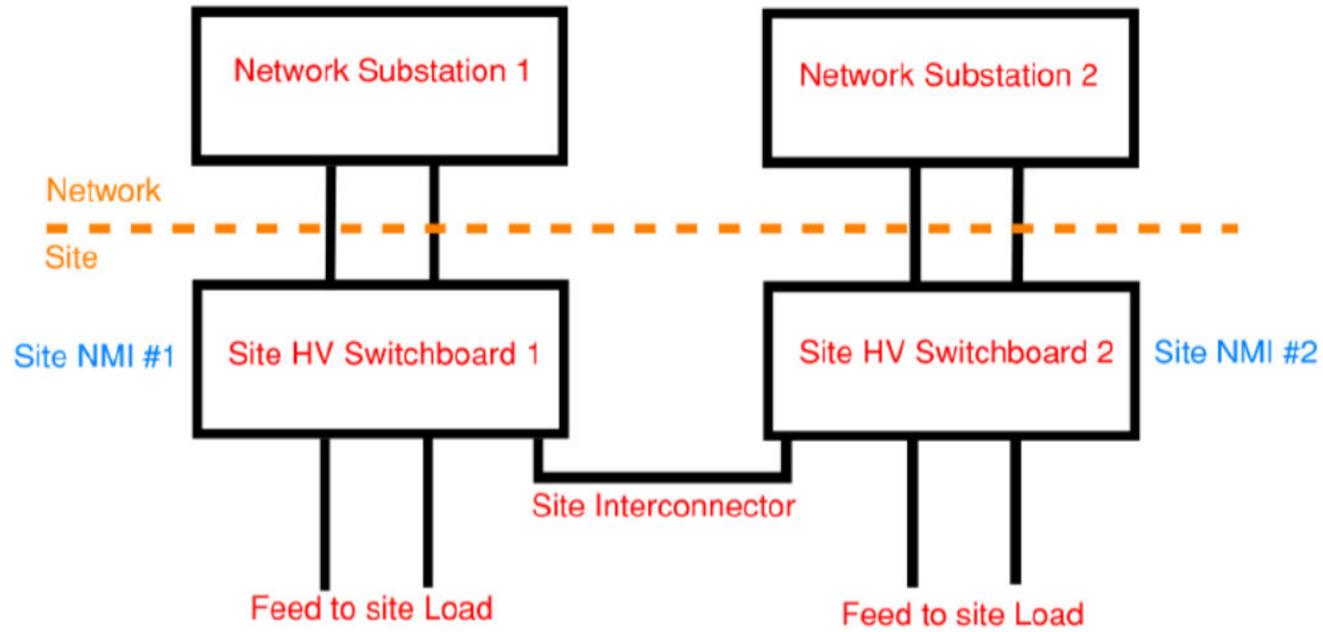
(1) a *connection point* is a *qualifying load* if:

(i) the *connection point* comprises a single *connection point* or a *parent connection point* in respect of all its associated *child connection points* that are not *market connection points*;

[NER Clause 2.3.6: Wholesale demand response units - AEMC Energy Rules](#)

Example site

Simplified Single Line Diagram (SLD) of the type of site which is currently excluded.



VIOTAS

VIOTAS proposal

Trial proposal

VIOTAS proposes a waiver of the following rule:

Chapter 2

Registered Participants and Registration >

Rule 2.3

Connection point and connected plant ... >

Clause 2.3.6

Wholesale demand response units

(m) In this Chapter:

(1) a *connection point* is a *qualifying load* if:

(i) the *connection point* comprises a single *connection point* or a *parent connection point* in respect of all its associated *child connection points* that are not *market connection points*;

[NER Clause 2.3.6: Wholesale demand response units - AEMC Energy Rules](#)

Trial proposal

Additional conditions may be required. For example:

A site with two or more multiple electrically-connected connection points can participate in WDR on the following conditions:

- *Each NMI is registered for WDR by the same DRSP.*
- *Each NMI is registered in the same DUID.*
- *Each NMI has the same FRMP or retailer.*

Trial proposal

During the trial, VIOTAS will demonstrate that:

- **Baselining, settlement and compliance is unaffected** (differences are insignificant) whether the NMI's are assessed individually (our proposal) or aggregated and then assessed (full rule change implementation required).
- The implication of this is that no system changes or development by AEMO is required.

The following slides are preliminary results from the desktop analysis.

Preliminary results

Baseline eligibility assessment

Eligibility assessment

Results were indifferent whether NMIs are measured independently or measured together.

- Accuracy must be $< +30\%$, bias $< -/+4\%$.
- Our sample sites are located in different regions.
- Each site has 2 connection points / NMIs, and these are electrically interconnected.
- Site B has solar.

	Baseline methodology		Accuracy	Bias	Pass or Fail
Site A	BM1, 20 days, CAISO 10 of 10, All days	NMI 1	3.33%	-0.46%	PASS
		NMI 2	3.13%	0.27%	PASS
		Site aggregate	1.08%	-0.08%	PASS
Site B	BM6, 20 days, Solar PV Baseline, Business days	NMI 1	26.46%	1.05%	PASS
		NMI 2	18.76%	3.56%	PASS
		Site aggregate	20.32%	1.83%	PASS

Simulated WDR response and results

Site A

- For this test, actual historical site consumption data was reduced by 1000kW for 1 hour to simulate a WDR response.
- The adjusted consumption data was then compared with its baseline to produce performance results for the event.
- The test was undertaken twice, keeping the NMI data separate, and then combining the NMI data.
- **The measured performance results were very similar regardless of the approach taken (individual or aggregated NMI data).**

Test	Dispatch date	Dispatch start interval	Dispatch volume (1 hour), kW	Site performance assessment, kWh	
				Individually assessed NMIs <small>NMIs are baselined and assessed separately, with results summed afterward.</small>	Site assessed as a whole <small>NMI meter data is combined before being baselined and assessed.</small>
1	21/02/2024	17:05	1000	1072	1015
2	4/05/2024	17:35	1000	994	994
3	12/05/2024	18:50	1000	982	982

Insignificant difference

Simulated WDR response and results

Site B

- For this test, actual historical site consumption data was reduced by 5000kW for 1 hour to simulate a WDR response.
- The adjusted consumption data was then compared with its baseline to produce performance results for the event.
- The test was undertaken twice, keeping the NMI data separate, and then combining the NMI data.
- **The measured performance results were very similar regardless of the approach taken (individual or aggregated NMI data).**

Test	Dispatch date	Dispatch start interval	Dispatch volume (1 hour), kW	Site performance assessment, kWh	
				Individually assessed NMIs <small>NMIs are baselined and assessed separately, with results summed afterward.</small>	Site assessed as a whole <small>NMI meter data is combined before being baselined and assessed.</small>
1	15/02/2024	19:15	5000	4973	4921
2	30/03/2024	17:35	5000	5145	4822
3	13/06/2024	19:05	5000	4566	4868

Insignificant difference

Simulated WDR response and results – “Gaming”

Site A

- This time, the test was repeated with one NMI reducing consumption by the dispatch volume, and the other NMI increasing consumption by the dispatch volume at the same time to represent an attempt at “gaming”.
- If gaming was successful, it would look like a response was provided, when there is no real net response.
- **Our test shows that the net result was evident, showing no real response. Gaming was not successful.**
- **The measured performance results were very similar regardless of the approach taken (individual or aggregated NMI data).**

Test	Dispatch date	Dispatch start interval	Dispatch volume (1 hour), kW	Site performance assessment, kWh	
				Individually assessed NMIs <small>NMIs are baselined and assessed separately, with results summed afterward.</small>	Site assessed as a whole <small>NMI meter data is combined before being baselined and assessed.</small>
1	21/02/2024	17:05	1000	72	15
2	4/05/2024	17:35	1000	-6	-6
3	12/05/2024	18:50	1000	-18	-18

Insignificant difference

Simulated WDR response and results – “Gaming”

Site B

- This time, the test was repeated with one NMI reducing consumption by the dispatch volume, and the other NMI increasing consumption by the dispatch volume at the same time to represent an attempt at “gaming”.
- If gaming was successful, it would look like a response was provided, when there is no real net response.
- **Our test shows that the net result was evident, showing no real response. Gaming was not successful.**
- **The measured performance results were very similar regardless of the approach taken (individual or aggregated NMI data).**

Test	Dispatch date	Dispatch start interval	Dispatch volume (1 hour), kW	Site performance assessment, kWh	
				Individually assessed NMIs <small>NMIs are baselined and assessed separately, with results summed afterward.</small>	Site assessed as a whole <small>NMI meter data is combined before being baselined and assessed.</small>
1	15/02/2024	19:15	5000	-27	-79
2	30/03/2024	17:35	5000	145	-178
3	13/06/2024	19:05	5000	-434	-132

Insignificant difference