

22 April 2026

**General Manager, Networks**

Australian Energy Regulator

GPO Box 3131, Canberra ACT 2601

aer@aer.gov.au

**RE: Submission — Review of Forecasting Best Practice Guidelines** (Draft Explanatory Statement, 25 March 2026)

Dear General Manager,

KIG Energy Management Pty Ltd (KIG / KEM Energy) submits this Letter in response to the AER's Draft Explanatory Statement on proposed Amendments to the Forecasting Best Practice (FBP) Guidelines, published 25 March 2026.

We are a Victorian Project Developer with An Active Pre-Engagement Process with AEMO and VicGrid for REEC-1, a 150 MW Solar + 150 MW / 1.2 GWh LDES + PCS Hybrid Platform at Kerang Terminal Station.

**1. We support The Proposed Amendments.**

Specifically, we support The Extension of The Compliance Reporting Window to 40 days, the ability to combine Compliance Reports, and The Provision for Compliance Report Extensions. These changes reduce The Risk of Rushed or Incomplete AEMO Reporting on ISP Inputs and Assumptions. For Hybrid Asset Classes such as ours — combining Redeployable Solar, Long-Duration Energy Storage, and Co-Located Edge Compute Load — Accurate Modelling in the IASR and ISP Methodology is material to Investment Certainty. Any improvement to The Quality and Timeliness of AEMO's Compliance Reporting on these assumptions benefits Developers and System Planners alike.

**2. We request One Clarifying Addition to The Final Guidelines.**

The Proposed New Section 2.6 enables AEMO to conduct Optional Early Targeted Consultation on Specific ISP Sections or Methodology Components. Whilst we support this Mechanism. However, we ask that The Final FBP Guidelines include a Clarifying Note — whether in Section 2.6 or The Accompanying Guidance — explicitly stating that early targeted consultation must be available for Novel or Hybrid Asset Types, Including:

- Redeployable or Non-Permanent Generation Assets (Solar or Storage not at a Fixed Registered Location)
- Long-Duration Energy Storage with Co-Located Power Conversion Systems acting as Grid-Forming Assets in Weak-Network REZs
- Controllable Behind-the-Meter or Co-Located Data Centre Loads that interact with VRE Generation Dispatch

Without such Clarification, AEMO's Default ISP Modelling may apply conventional assumptions to these configurations, potentially undervaluing their System Services Contribution and producing ISP outcomes that do not reflect the intent of The 2024 NER Demand-Side Factor Amendments.

**3. We Flag a Gap tot Addressed by this Consultation.**

The Proposed Amendments do not address how AEMO Models Redeployable Assets, Hybrid Solar-Storage-Compute Platforms, Or Data Centre Load Forecasting in Transmission versus Distribution Zones. We do not suggest this Consultation is the right vehicle for those issues.

## KIG Energy Management Pty Ltd

KEM Energy | REEC-1 | Kerang Terminal Station, Victoria  
Greg Fonti, Chairman | Sarina Le, CEO

---

We raise them to note that The Clarification we seek in point 2 above is a Necessary Precondition for the early Consultation Mechanism to be effective for Project Types like REEC-1. We intend to engage directly with AEMO on these Modelling Questions through The ISP Stakeholder Process.

We thank the AER for the opportunity to Comment and Support The Efficient Finalisation of these Amendments.

We are available to discuss this submission at the AER's convenience.

Yours sincerely,



### Greg Fonti

Chairman, KIG Energy Management Pty Ltd

### Sarina Le

Chief Executive Officer, KIG Energy Management Pty Ltd

**Consultation Reference:** AER Review of Forecasting Best Practice Guidelines — Draft Explanatory Statement, 25 March 2026.

**Submission Deadline:** 24 April 2026.

**Project Reference:** REEC-1, Kerang Terminal Station, Victoria — Pre-Engagement in progress with AEMO and VicGrid (KEM-HP-HW-2026-004 v1.4, April 2026).