

22 November 2024

Ms Clare Savage  
Chair  
Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601

By online submission: AER212772

Dear Ms Savage

**Submission on PLUS ES Trial Waiver Application in the Energy Innovation Toolkit**

AEMO welcomes the opportunity to provide feedback on PLUS ES's trial waiver application under the Energy Innovation Toolkit.

AEMO supports the waiver requested by PLUS ES, recognising the potential for this trial to yield valuable insights that could inform AEMO's development of procedures and guidelines under the recent Australian Energy Market Commission (AEMC) rule on Unlocking CER Benefits through Flexible Trading<sup>1</sup>.

The controls proposed by PLUS ES appear well-considered, logical, and effectively mitigate potential concerns associated with the innovative approach to metering kerbside electric vehicle (EV) charger connections. The outlined measures provide a balanced approach to ensuring market integrity while facilitating a forward-looking trial that aligns with the energy sector's evolving landscape.

The proposed timeframe for the trial appears both reasonable and practical. It aligns with the AEMC's established timelines for AEMO's development of enduring solutions, ensuring that learnings from the trial can be integrated into broader market reform efforts and consultations.

Additionally, AEMO supports the addendum to the trial waiver application, which seeks to expand the trial project to South Australia and increase the volume of EV charger installations. Incorporating a greater diversity of regions, installation configurations, and housing types is likely to enhance the potential for learning. This expanded scope can provide more comprehensive insights into the operational and integration challenges and opportunities that arise in various contexts, strengthening the trial's value.

AEMO welcomes innovation in the field of CER integration and the advancement of flexible trading models. We look forward to working with the AER team and PLUS ES, should the waiver be approved, to explore and implement findings that will benefit the market and end users. Should you wish to discuss any of the matters raised in this submission, please contact [REDACTED] Group Manager Strategic Market Reform, at [REDACTED].

Yours sincerely,

[REDACTED]  
**Executive Group Manager – Reform Delivery**

<sup>1</sup> <https://www.aemc.gov.au/rule-changes/unlocking-CER-benefits-through-flexible-trading>