

WAIVER APPLICATION

Summary

ID SBX-0000219
Title SBX-0000219 - Trial Waiver Application - [REDACTED]

Submitting User [REDACTED]
Job Title/Position [REDACTED]

Initial Submission Date 23/05/2026 12:46 AM **Latest Submission Date** 2/06/2026 4:36 PM

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 49 104 710 278
ACN (if applicable) 104 710 278
Organisation Name ENEL X 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.) Private Limited Company

Organisation Business Address

Address line 1 Level 34, 140 William Street
Address line 2
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 [REDACTED]
Name of contact [REDACTED]

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Contact role
 Contact telephone
 Contact email



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? Yes
If so, is it a licence, an exemption or both licence(s) and exemption(s)? Exemption
Licence(s) held
Exemption(s) held Electricity distribution exemption; Generation registration

AEMO Registration

Is the applicant registered with the Australian Energy Market Operator as a market participant? Yes
If so, which categories? Market Small Generation Aggregator; 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

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Has the applicant, any directors of the applicant, any related body corporate, or any person with significant managerial responsibility or influence on the applicant been involved in any material breaches of obligations regulated by the commission or any other regulator?
If yes, please provide details

No

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?
If yes, please provide details

No

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

Enel X Australia was the first registered demand response service provider (DRSP) and is an Integrated Resource Provider (IRP) in the national electricity market (NEM). Enel X focuses on providing demand services from commercial and industrial (C&I) customers, this includes wholesale demand response, energy and market ancillary services, firming capacity and reserve and emergency trader (RERT).

Enel X actively advocates for opportunities to promote, and invest in, innovations (or systems) that support flexible demand services in the NEM and the Wholesale Electricity Market (WEM). This is key part of Enel X's commercial activities and Enel X was the first to identify the opportunity for sites with multiple electrically connected connection points to participate in the wholesale demand response mechanism (WDRM). To that end, Enel X proposed the opportunity to innovate via submitting a rule change to the AEMC in April 2022 to provide WDR from sites with multiple connection points.

We support the continuation and growth of the WDRM scheme and hope that this Sandbox trial will support this. We would propose that this trial waiver application is reviewed in tandem with VIOTAS's trial waiver application on the same topic.

Enel X is applying for a trial waiver in relation to clause

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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).

As mentioned, in 2022 we 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. VIOTAS has provided 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 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.

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Enel X has built a pipeline of industrial consumers that we have been unable to register in WDRM solely because they have multiple connection points on a site. These are usually larger sites with significant flexibility potential that could be utilised to support the grid. Our analysis, shared as part of the 2022 rule change request, stated that there was over 300 MW of WDR-capable sites prevented from participating at that time. With the growth in data centres, and our further development of relationships with industrial sites, this figure has grown since that date.

Confidential information (if any)

[Redacted]

[Redacted]

[Redacted]

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. Additionally, this supplements VIOTAS's trial waiver application as, by providing the same opportunity to a second DRSP (Enel X) this alleviates the negative impacts on competition in a competitive sector of the national electricity market, and will accelerate and augment lessons learned.

The objectives of the trial project are:
- Test the suitability of the proposed approach of not

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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.
- Provide industrial consumers with a choice of providers for this service, should they choose to participate, so that the characteristics of a competitive market are preserved in this trial waiver period.

The success criteria for the trial project are:

- Accelerate uptake in the WDRM. Successfully register several 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.
- Demonstrate, under a range of dispatch and operational circumstances, that this does not distort the operation of the market, especially as regards settlement

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)	

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If Commission Guideline, please specify
Confidential information (if any)

If Other, please specify
Confidential information (if any)

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;

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](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 and control devices,
owned by Enel X, 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, Enel X 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 10 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

National

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Is this confidential?	False
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

For market operations, Enel X's local and global Real-Time Operations Centre monitors market conditions, manages market bidding and monitors and supports end-users in readying for and responding to dispatch at all hours of the day and all days of the year.

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 in the remaining years. 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 allow more customers to participate in the WDRM; this will increase demand side participation in the NEM which will allow large C&I customers to be rewarded for reducing their electricity consumption during peak demand periods. Ultimately, the national electricity objective (NEO) is met because increased demand-side participation and better utilisation of customer resources lowers the spot price at times of peak demand, this increases operational efficiency and potentially supports security and reliability of the power system.

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, Enel X 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. Enel X is not entering into a standard or market retail contract and not providing customer connection services. The current protections that safeguard energy

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retail customers will remain intact, ensuring no alterations to the standard roles and protections.

Confidential information (if any)

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

Enel X 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 on Enel X's proprietary systems. These systems are governed by the Enel Group's strict cybersecurity standards which are outlined at

<https://www.enel.com/investors/sustainability/strategy-sustainable-progress/digitalization> and the explanation of Enel Group's cybersecurity audits and ISO 27001 certification is outlined at

<https://www.enel.com/content/dam/enel-com/documenti/investitori/sostenibilita/cyber-security-document.pdf>.

No customer information will be disclosed unless, and to the extent, expressly permitted by the customer as governed by our contracts with customers.

Confidential information (if any)

Risk management

Description of the risk management plan for the proposed trial project

A risk management plan has been developed for this project, categorising risks and ways to mitigate these. Throughout the project this will be reviewed, amended and additions made, to assist in the management of risks and to maximise the chances of successful achievement of objectives and outcomes.

Confidential information (if any)

[Redacted]

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

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

The risks to other market participants are of the nature of negative impacts on competition in a competitive sector of the national electricity market. This would occur if Enel X were to have access to provide these services to C&I end-user sites with multiple connection points and other DRSPs do not. Mitigation measures are:

- We recommend the AER provide the same conditions and restrictions to this trial waiver as they do to the related VIOTAS trial waiver, so as to ensure a level competitive playing field and equal opportunity to end-users to select their aggregator of choice should they wish to participate.
- Enel X is supportive of other DRSPs, who should so

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wish, submitting a similar trial waiver application and being provided the same conditions and restrictions on their trial waiver and to align it with the timeline of any trial waiver provided to Enel X and VIOTAS.

Confidential information (if any)

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

VIOTAS's 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 exists 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, Enel X will commit to conducting validation checks at the conclusion of any events/series of events.

Enel X would propose an additional safeguard, as mentioned in our submission response to VIOTAS's trial waiver application:

- If a NMI at a specific trial site is made unavailable in AEMO's Portfolio Management System all other NMIs at that site are to be made unavailable

This is necessary as AEMO's Portfolio Management System (PMS) facilitates a DRSP temporarily making an NMI unavailable and is typically used if the load becomes non-compliant to NER requirements such as NER clause 3.8.2A(c)(2). This functionality in PMS exists to allow a DRSP to operate an aggregated DUID with any non-compliant resource (NMI) temporarily excluded and does not link NMIs at a site level.

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

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

Enel X, and its predecessor companies, has been operating in Australia since 2010. We are a wholly-owned subsidiary of the Enel Group, a Fortune Global 500 company. Globally, we offer over 10 GW of flexible demand to electricity markets across the Asia-Pacific, the Americas and Europe. We have operated across all manner of demand response markets, generally being first and largest participant in each, such as WDRM, FCAS, RERT and the Wholesale Electricity Market's Reserve Capacity Market. In WDRM, Enel X has 329 MW registered across 217 individual loads. We are responsible for every WDR dispatch in the market to date and have participated since the market's inception in 2021.

Confidential information (if any)

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 the NER is changed to allow multiple connection point to participate in the WDRM. The AEMC has indicated that Enel X's rule change proposal (submitted 26 April 2022 and AEMC reference ERC0345) seeking to expand the eligibility of the WDRM to sites with multiple connection points, is scheduled to be initiated in 2026.

By amending the NER, Enel X's rule change request would permanently enable changes for the innovations applied for under this waiver application. Enel X expects that trial participants would continue to participate and transitional arrangements may need to be established to ensure the classification of these sites under the NER. 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

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

Like all Enel X customers, the trial project participants will have a dedicated account manager who can be contacted and will ensure that any questions or concerns about the pilot are promptly addressed.

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Confidential information (if any)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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)

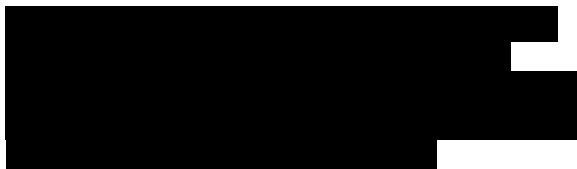
Description of what consultation the applicant has undertaken with the Energy and Water Ombudsman (Victoria) in relation to dispute resolution processes
Confidential information (if any)

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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

Confidential information (if any)

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



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)

Development of regulatory experience

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

Confidential information (if any)

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".

Consultation with other regulators

Has the applicant engaged with the jurisdictional safety regulator on the project?

No

Is this confidential?

False

If no, why not?

Not applicable for this project.

Confidential information (if any)

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

The specific consumers and sites participating in the trial are commercially sensitive and are subject to a

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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

confidentially claim. Enel X 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 Enel X has in the NEM. Enel X 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

Enel X will provide all relevant information to AEMO and AER that is required for WDRM market registration and participation. Enel X 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 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

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

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the trial project may involve risks to consumers and (if so), how those risks might be mitigated

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 clause 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

VIOTAS has undertaken desktop research to determine that the project concept is sound. Enel X is already a registered provider of WDR services and is already commercially operating in this market, with 329 MW registered over 217 loads and all WDR dispatch in the market to date occurring through Enel X's DUIDs. Multiple potential WDR sites are lined up for participation in this project.

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.

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

This trial waiver serves to increase competition if approved by the AER in line with our proposed stipulations, namely:

- We recommend the AER provide the same conditions and restrictions to this trial waiver as they do to the related VIOTAS trial waiver, so as to ensure a level competitive playing field and equal opportunity to end-users to select their aggregator of choice should they wish to participate.
- Enel X is supportive of other DRSPs, who should so wish, submitting a similar trial waiver application and being provided the same conditions and restrictions on their trial waiver and to align it with the timeline of any trial waiver provided to Enel X and VIOTAS.

In such a situation, this serves to increase competition in several manners:

- It increases the eligibility of participation in WDRM to sites with multiple connection points, given them additional ways to monetise their flexible demand by participating with a DRSP

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- It provides a level playing field for DRSPs to provide this service offering, and allows end users to select the DRSP of their choice
- It accelerates the uptake of WDR, providing additional sources of generation to increase competition in the wholesale electricity market

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. 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

Enel X 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 reasonable prospect of giving rise to materially

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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	260523 AER Enel X trial waiver application.pdf	207.15 KB

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