

# WAIVER APPLICATION

## Summary

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

## Organisation

<b>ABN</b>	[REDACTED]
<b>ACN (if applicable)</b>	[REDACTED]
<b>Organisation Name</b>	VIOTAS AUSTRALIA PTY LTD
<b>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.)</b>	VIOTAS Australia Pty Ltd is an Australian Private Company.

## Organisation Business Address

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

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

## Organisation Postal Address

<b>Address line 1</b>	
<b>Address line 2</b>	
<b>City/Suburb</b>	
<b>State/Territory</b>	
<b>Postcode</b>	

## Contact Details

<b>Organisation website</b>	<a href="https://viotas.com/">https://viotas.com/</a>
<b>Name of contact</b>	[REDACTED]

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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** No

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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)**

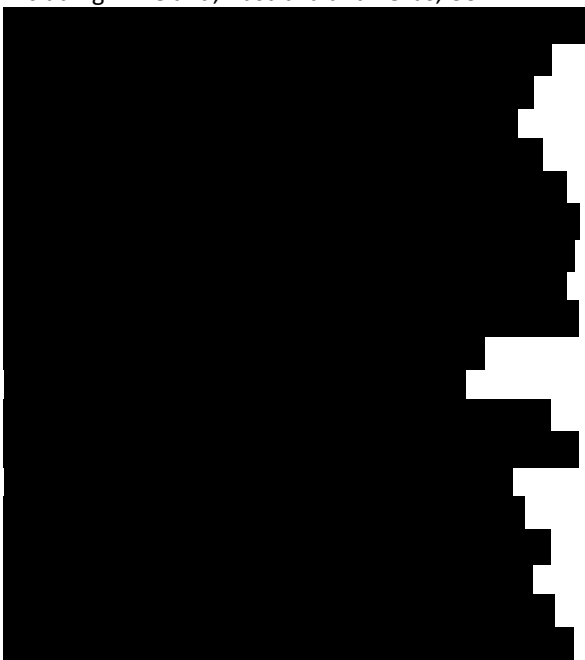
**Description of any consultation undertaken with Australian Energy Market Operator, Energy Safe Victoria or any other relevant bodies regarding the proposed trial project and the risk management plan**  
**Confidential information (if any)**

## Operational capability

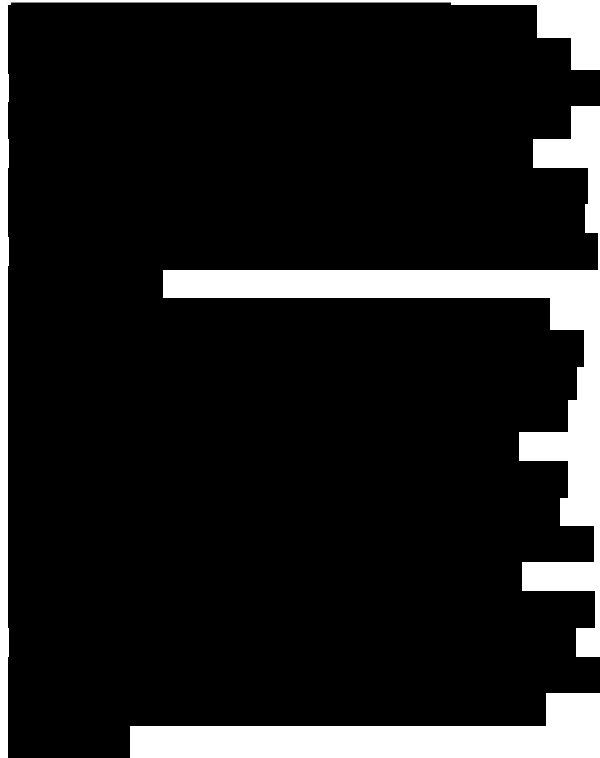
**Evidence of the organisation's operational, technical and financial ability to carry out the proposed trial project**

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.

**Confidential information (if any)**

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



**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?

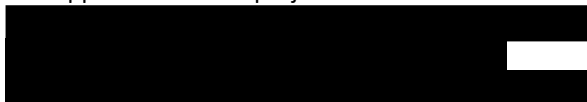
No

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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