

Harrison Gibbs
Senior Advisor
Australian Energy Market Commission

13 August 2025

Dear Mr Gibbs,

RE: Review of the Wholesale Demand Response Mechanism, Draft report

VIOTAS appreciates the opportunity to respond to the AEMC's draft report.

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. We work with various customer assets including flexible consumption, generation, battery and solar assets. As a registered participant in the WDRM, VIOTAS is pleased with the AEMC's draft recommendation to continue operation of the WDRM. VIOTAS supports the initiation of the *Expanding eligibility under the WDRM* rule change request.

Please refer to our more detailed response, below.

Feel free to contact me to discuss further.

Kind regards,

Amelia Bennett
Market Operations Manager

AEMC Recommendation: the WDRM should continue operating.

VIOTAS supports the AEMC's recommendation that the WDRM continue operating.

Removal of WDRM uncertainty will encourage investment and participation

Until the AEMC draft report was published, uncertainty over the continuation of the scheme due to the review has meant that VIOTAS, and likely others too, have held back investment in marketing and development of systems to accommodate the scheme. Scheme certainty will allow us to bring in new customers and create the necessary infrastructure to enable participation. It is likely there are other parties who have chosen not to participate to date due to this uncertainty. VIOTAS believes that the WDRM will grow in participation over time and provide greater benefits to energy consumers.

WDRM facilitates non-FRMP demand response

As the AEMC states in the Draft report, the WDRM is the only wholesale market mechanism that facilitates demand response, and the only mechanism that allows non FRMPs to participate in the energy market.


Without the WDRM, the ability for consumers to participate in a two-sided market is limited. There is no comparable service that current or potential participants of the WDRM can move across to. CER and IPRR are not alternatives. Existing contracts and customers participating in WDRM are not spot exposed in any other way, so phasing out the WDRM would mean their only means to participate in the spot energy market is via their retailer.

Large energy users can actively participate in the energy market by choosing a spot price contract with their retailer / FRMP. However, not all large energy users want to be exposed to the energy market all the time. WDRM is suitable for those with limited but valuable flexibility.

Third party access facilitated through the WDRM is important for the market. Enabling a large energy consumer to participate in demand response should be a market open to both retailers and DRSPs as the increased competition and gives consumers better service and more choice. VIOTAS believes DRSPs are best placed for demand response given the focus of the business, the technological advantages, and the aligned incentives with consumers.

AEMC Recommendation: the *Expanding eligibility under the WDRM* rule change request be initiated.

VIOTAS supports the AEMC's recommendation that the *Expanding eligibility under the WDRM* rule change request be initiated. We are keen to see sites with multiple connection points allowed to participate in the WDRM and given the immediate potential for increased participation, and the minimal changes required, we recommend this be addressed promptly.



We note that this recommendation was put forward by Enel X in 2022. We assume that at least one site with multiple connection points which was otherwise suitable for participation in the WDRM was unable to do so due to the requirement for a single grid connection point. As a result, this site or sites have missed out on contributing to the energy market in the 3 years since. Enel X stated in their submission to the consultation paper that 100MW of WDR response could now be registered if the rule was changed.

We agree with Enel X that many commercial and industrial sites are served by multiple connection points and could be major sources of demand flexibility. VIOTAS also works with consumer sites with multiple connection points which are suitable for WDRM but to date have been unable to be registered. We are keen to have these sites participating in the WDRM as soon as possible. The AEMC could take the Enel X and VIOTAS submissions as evidence that the proposal “has the possibility to unlock significant MWs of participation immediately” without the need for further consultation.

The proposed solution requiring each of a load’s connection points to participate in the WDRM, and for each of those connection points to have the same retailer, makes sense. We understand that some updating to AEMO systems may be required for AEMO to apply baselines and assess the electrically interconnected connection points as one for performance and settlement. Now that there is more certainty in the WDRM continuing, this investment is warranted.

Removing this barrier to WDRM participation is in the long-term interest of energy consumers as it will further reduce energy prices (as per AEMC calculations proving WDRM benefits). Given the low capital cost involved, this will further support the achievement of the National Electricity Objective (NEO).

Expanding the WDRM to facilitate two-way demand response

VIOTAS is keen to become involved in a future scheme to incentivise and enable two-way demand response, particularly to address Minimum System Load issues. We believe there is significant untapped potential for large energy consumers to increase net consumption at times and that there would be willingness to do so if the benefits justified the action.

Baseline development and DNSP endorsement

VIOTAS looks forward to working with AEMO to discuss potential new baselines with the potential to unlock further participation.

Removal or expedition of the DNSP endorsement process would be welcomed. There should not be any additional cost incurred by the participant for obtaining DNSP endorsement.