

CERTIFICATE OF TRIAL WAIVER

This certificate records, for the purposes of clause 8.16.6(a) of the National Electricity Rules, that the Australian Energy Regulator has granted a trial waiver to the proponent for the approved trial project identified below as required by the National Electricity Rules.

Certificate reference: TWC0004 **Date issued:** 14 July 2026

Trial waiver proponent	VIOTAS AUSTRALIA PTY LTD
ABN / ACN	96 643 554 107 / 643 554 107
Trial project name	WDRM Trial
Innovative project description	The trial will test whether sites with multiple, electrically connected connection points can participate effectively in the Wholesale Demand Response Mechanism.
Regulatory framework	National Energy Framework
Waived obligation(s)	NER clause 2.3.6(m)(1)(i)
Waiver commencement date	June 2026
Waiver end date	June 2031
Decision authority	Delegated AER Board member

Certification statement. The Australian Energy Regulator certifies that, following assessment of the application and relevant supporting material, a trial waiver has been granted to the proponent identified above for the approved trial project, subject to the scope, duration, conditions (attached below) and any reporting requirements set out in the AER's written decision and associated instruments.

Decision record and conditions. This certificate is evidence of the grant of the trial waiver only. It must be read together with the AER's final decision, any notice of decision, waiver instrument, approved conditions, reporting requirements and any subsequent variation, revocation, or replacement instrument.

Final decision reference / link	AER - EIT - VIOTAS trial waiver decision.pdf
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Important note: This certificate does not certify that the proponent or the trial project complies with all applicable regulatory requirements. The proponent remains responsible for compliance with all obligations that have not been expressly waived or modified by the AER's decision.

In accordance with clause 8.16.6(a) of the National Electricity Rules, this trial waiver is certified on behalf of the AER Board by Board member:

Name: Jarrod Ball

Signed:



Date: 14 July 2026

Conditions

As provided in section 18ZM of the NEL, the AER may impose any conditions we consider appropriate for the trial. This allows the AER to impose conditions to ensure issues raised through public consultation are addressed, ensuring the trial maximises the learnings, while also ensuring other requirements are met. Section 18ZR of the NEL requires that a trial waiver proponent must comply with any conditions to which the trial waiver is subject. If the proponent breaches a condition, the AER may revoke the trial waiver or revoke or vary the condition, or impose further conditions on the trial waiver.¹

The conditions developed over 6 months by AER staff, AER Board and through consultation for the VIOTAS trial will be identical to the ones imposed on Enel X. The AER has imposed the following conditions on VIOTAS in granting the trial waiver.

Condition 1: Site number

VIOTAS's trial project is to be limited to a maximum of 10 trial sites.

Condition 2: Mitigating impacts on AEMO

Applications to classify loads as wholesale demand response units (WDRUs) must be submitted to AEMO on a phased basis (a maximum of 2 applications per week).

Condition 3: Single line diagrams

VIOTAS must provide the AER and AEMO with an up-to-date single line diagram (SLD) for each trial site at the time it seeks to classify that trial site with AEMO, and must provide updated SLDs within 3 business days in the event of any material changes to the electrical configuration of a trial site. The SLD must clearly identify the complete and fixed set of NMLs and metering points that together represent a single operational facility for the purposes of the trial.

AEMO may engage with the local network service provider to validate SLDs. Where changes occur, the AER may (after consulting with AEMO) determine whether the site may remain part of the trial or will cease participation in the trial.

Condition 4: Site selection

VIOTAS must propose any trial sites to AEMO and obtain AEMO's endorsement prior to commencing an application to classify the site as a WDRU, and must inform the AER once it has obtained this endorsement. VIOTAS must provide to AEMO the following information in relation to trial sites:

- the number of connection points
- the (single) financially responsible Market Participant at each connection point of a site
- any history of non-compliance at the site
- whether real-time telemetry is available at the site
- whether multiple single connection point WDRUs will be dispatched by a single dispatchable unit identifier (DUID)
- the total capacity of the site and the registered WDR capacity of the site.

VIOTAS must provide any additional information reasonably requested by AEMO in its exploration of the suitability of the site. VIOTAS must provide this information to the AER on request. Any disputes between VIOTAS and AEMO will be resolved by the AER.

Condition 5: Performance and conformance

AEMO has the discretion to declare a trial site WDRU non-conforming after a single non-conforming dispatch outcome. VIOTAS must notify the AER of any such occurrence within 3 business days.

If any 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.

Condition 6: Classification for WDRM with the same DRSP and market customer or retailer

All connection points at a trial site are to be classified for WDRM, assigned with the same AEMO WDRM baseline methodology, registered by the same DRSP and share the same market customer or retailer.

Condition 7: Reporting and validation

VIOTAS is to provide 6-monthly reporting to the AER, AEMO and the AEMC of observed outcomes under the trial. The first VIOTAS report is to be provided within 6 months of the date this trial is granted. The AER may require information from VIOTAS on written request outside of this reporting cycle, and will provide a reasonable timeframe in which VIOTAS must provide this information.

Reporting to the AER, AEMO and the AEMC must include:

- the total number of trial sites currently classified or undergoing the classification process with AEMO
- the jurisdiction in which each trial site (current or undergoing classification) is located
- site use (e.g. industry), capacities (in MWh, both total and WDRM-classification) and number of connections points per site, of sites classified at the end of each reporting period
- number of dispatch events for each trial site during the reporting period
- post-dispatch performance and settlement data, comparing the proposed approach to the aggregation approach
- other emerging learnings or issues as relevant.

VIOTAS is to publish each subsequent report on its website and must provide a link or copy to the AER, within 20 business days from the end of each 6-month period.

Where requested, VIOTAS may seek to redact information from reporting that it considers to be confidential. VIOTAS must obtain the AER's written consent – which it may give at its sole discretion – to any redaction, and this consent must be sought prior to the date on which the report is published. VIOTAS must, on request by the AER, provide it with unredacted trial information, only excluding personal information.

Condition 8: Site classification

A minimum of 2 trial sites must be fully classified within 6 months of the trial start date to ensure that learnings are available in time for the Proposed WDRM Rule Change process.

The AER can in its absolute discretion extend the time for compliance with this condition if events outside of VIOTAS's control prevent compliance.

Condition 9: Protecting consumers

Where a trial site is owned or operated by a party other than VIOTAS, VIOTAS must provide written information to that owner or operator that its participation in the WDRM is as part of a trial, and that trials involve risk. This notice must be provided prior to classification of the site with AEMO and must detail information about the trial, including its length, conditions and the possibility of the trial concluding before its scheduled completion for reasons outlined in the Trial Project Guidelines and cl. 8.18.2(a)(2)(i) of the NER. It must also explain how the trial might impact the activities of the third-party owner or operator of the site. A copy of this notice must be provided to the AER prior to site classification.

Embedded networks and residential electricity consumers will not be included in this trial.
