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Australian Energy Market Operator
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AirTrunk's Submission to AEMO's Market Visibility Framework Consultation

AirTrunk welcomes the opportunity to respond to AEMO's draft Market Visibility Framework. We support the objective of improving visibility of material wholesale price response to strengthen forecasting, market efficiency and operational decision making. A proportionate framework can support these outcomes while enabling more efficient demand response decisions and maintaining the reliability of critical digital infrastructure.

AirTrunk is a leading developer and operator of hyperscale data centres across Asia Pacific and Japan, with 23 campuses and 3.3GW of capacity. In Australia, we operate five data centres and have further development in our pipeline. Our infrastructure supports the cloud and AI services increasingly relied upon by businesses, governments and communities. We are committed to growing that infrastructure responsibly, with sustainability embedded across our design, financing and operations, including our commitment to Net Zero by 2030 and investment in renewable energy, recycled water and community outcomes.

We welcome AEMO's evidence based, staged approach and its commitment to coordinate the MVF with related reforms, particularly the Operational Integration and Visibility of Large Inverter-Based Loads (OIV) proposal. Our submission focuses on four considerations relevant to the application of the framework to data centres.

Scope the obligations to material, coordinated wholesale price response

AirTrunk supports AEMO's focus on resources that respond to actual or forecast wholesale spot prices, with obligations targeted to material, coordinated wholesale price response. For data centres, the framework should distinguish these responses from changes in consumption driven by routine operations, customer workloads, maintenance or reliability requirements. Eligibility criteria should make clear that technical controllability and non-price driven changes in demand do not, by themselves, establish wholesale price responsiveness. And that a data centre's size or technical controllability should not, by itself, establish eligibility for these obligations.

For Modes 2 and 3, thresholds should be based on demonstrated wholesale price-responsive MW, rather than total site demand, connection capacity or battery nameplate capacity. AEMO could initially adopt higher thresholds and review them as evidence of price response and visibility needs develops. Guidance should clarify how the illustrative 100 MW Mode 3 threshold would be measured and verified, and which data centres would fall within its scope. The methodology should specify the baseline and evidence used to attribute changes in demand to price response, whether thresholds apply to individual sites or coordinated groups of sites, and how tenant loads and batteries will be counted without counting the same change in grid demand more than once. It should also recognise contractual and operational constraints on available response, including notice, duration and recovery requirements.

Allocate reporting to the party with control and access to information

Reporting responsibilities should be allocated to the party that controls or coordinates the response and has access to the information needed to report accurately. The framework should clearly identify the respective responsibilities of operators, tenants, retailers and aggregators. In multi-tenant data centres, visibility of aggregate site demand does not necessarily provide the operator with control over, or advance knowledge of, customer workload decisions or third party energy asset operation.

Parties should not be required to report information they cannot access or reasonably verify or be responsible for outcomes they cannot influence.

Where the Financially Responsible Market Participant or registered service provider is the formal reporting entity, supporting contractual arrangements should clearly identify the party controlling the response and allocate information responsibilities accordingly. Requirements should reflect each party's access to information and capacity to influence the reported behaviour. Consolidated reporting should be available for campuses with shared connections or multiple ownership and supply entities, with clear accountability and without requiring multiple parties to submit the same information separately.

Coordinating requirements and recognising equivalent information

AirTrunk supports AEMO's recognition that the proposed OIV reforms and network connection arrangements may provide equivalent operational visibility. The final framework should make this boundary explicit, recognising information already supplied and limiting additional MVF requirements to clearly identified gaps in the information already available. Consistent definitions and reuse of information already provided would support effective visibility while avoiding duplicate reporting.

Information requirements should be proportionate to their stated purpose, with clear arrangements for access, use and confidentiality. Commercially sensitive and critical infrastructure information should be protected, with wider publication appropriately aggregated or de-identified.

Preserving flexibility through proportionate implementation

A clear framework can give operators and customers greater certainty about how deliberate price response, contracted demand response and battery activity should be reported, supporting more informed market and operational decisions. Reporting formats, frequency and accuracy standards should reflect the characteristics of each resource and the practical capability of the responsible party. Forward looking information should remain capable of revision as availability and customer requirements evolve, and operational requirements should recognise demonstrated capability and the need to maintain critical services.

We recommend that proposed requirements be trialled and assessed with industry before becoming mandatory. Trials should test whether the information improves demand forecasting or operational decisions, and whether those benefits justify implementation and ongoing costs. AEMO should publish the findings and use them to refine the requirements. Detailed requirements should be available sufficiently in advance of commencement, with appropriate transition arrangements. This approach would improve visibility while maintaining incentives for voluntary and commercially contracted flexibility.

AirTrunk would be pleased to meet with AEMO to discuss our submission and support the detailed design of the framework. We would also welcome the opportunity to provide a practical data centre briefing showing how ordinary changes in tenant workloads differ from deliberate wholesale price response, and how battery activity can be assessed against the campus's net grid demand.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Whitelaw".

Sabooh Whitelaw
Associate Vice President, Energy and Utilities
AirTrunk