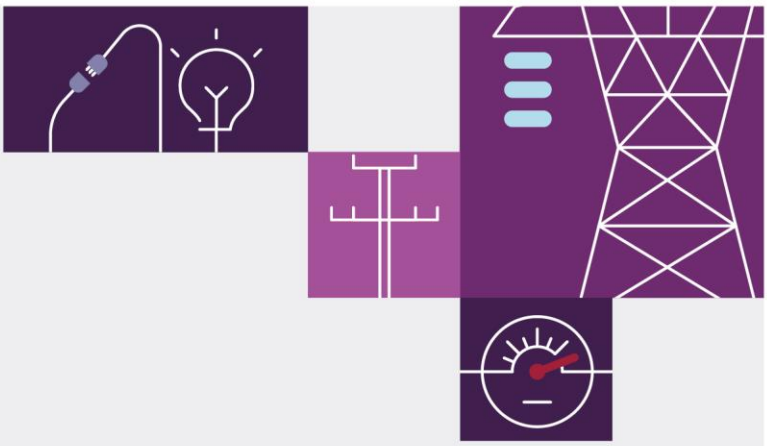
# CER Data Exchange Industry Co-Design - Consultation Summary Report

December 2024

Consultation Submissions Summary Report



# Important notice

## Purpose

The purpose of this publication is to provide a summary of stakeholder feedback and highlight key themes in response to the CER Data Exchange Industry Co-Design Consultation Paper, which was published in Mid-October 2024. This summary report compares stakeholder views and identifies where there is consensus on the key issues. The final stages of the consultation process, including reaching alignment on the high-level design and implementation roadmap for the CER Data Exchange, will build on these confirmed stakeholder positions. Finally, this report highlights next steps in the project and opportunities for stakeholders to further contribute to the co-design process, including a third open in-person workshop.

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# Executive summary

**Key points**

- **Reform priority:** AEMO is progressing the development of a national Customer Energy Resource (CER) Data Exchange – a critical enabling digital infrastructure that will facilitate secure, reliable, and efficient data-sharing between organisations across Australia's evolving distributed energy landscape. We have undertaken a co-design process to consider the use cases, functionality, ownership options, governance, and implementation strategy of the CER Data Exchange. This is a National Reform Priority under the CER Roadmap.
- **Wide representation of views:** In response to our October 2024 Consultation Paper, we received 23 submissions from a broad range of stakeholders – including retailers, distribution network service providers (DNSPs), industry associations, aggregators, technology providers, Original Equipment Manufacturers (OEMs) and advisors.
- **Broad stakeholder support:** Among these stakeholders, there is broad support to implement a CER Data Exchange. Submissions are generally very supportive of the need to progress the CER Data Exchange as a key policy reform initiative. Submissions emphasise that the CER Data Exchange should ultimately deliver clear benefits to both consumers and the energy market as a whole. This includes improved efficiency, lower costs and enhanced reliability of energy services. Stakeholders stressed that communication of these consumer benefits is essential to drive engagement and build trust in the CER Data Exchange.
- **Start narrow, then scale:** Stakeholders support starting with a narrow, foundational focus – particularly on priority use cases, consistent CER standing data and sharing network limits, with flexibility to expand into additional use cases over time.
- **AEMO preferred operator:** Submissions largely favour the AEMO owner and operator model option due to its existing expertise and infrastructure. There is also significant support for leveraging existing systems and infrastructure, such as the Industry Data Exchange (IDX), to streamline implementation and costs.
- **Priority use cases**: There is broad industry alignment on the priority use cases identified in the Consultation Paper, as well as the proposed data sharing capability to support current and future CER data sharing use cases. There is less support for other potential strategic use cases explored in the Consultation Paper.
- **Phased implementation and reform alignment:** Submissions agree with the phased implementation approach outlined in the Consultation paper. Submissions highlighted the need to ensure implementation of the CER Data Exchange is aligned with related reform initiatives.
- **Funding model may require initial support:** Several submissions propose a government-funded model in the short term to recover initial costs, moving to a user pays approach over time. Stakeholders highlighted the need to clearly demonstrate the benefits of the CER Data Exchange to consumers.
- **Governance and oversight preferences:** Most submissions consider existing regulators / market bodies should be responsible for oversight of the CER Data Exchange, such as the Australian Energy Regulator (AER). For data governance, there was support for either an industry collaboration model or the exchange operator to provide oversight. Some stakeholders propose alternative options that can be further explored.
- **Robust data privacy and security:** Stakeholders highlighted the need for robust consumer privacy protections, standardised consent processes and compliance with evolving regulations. Ensuring trust in the exchange is seen as vital for adoption.
- **Interoperability and technical standards are fundamental:** Submissions stress the importance of aligning the Exchange with existing standards where possible, such as CSIP-Aus. A focus on interoperability will support market efficiency and future scalability.

This Consultation Summary Report provides an overview of the written submissions received on the Consumer Energy Resource (CER) Data Exchange Industry Co-Design Consultation paper. The paper was released in mid-October 2024, and outlined a proposed framework for the design of a national CER Data Exchange.

The CER Data Exchange aims to support the scaling of CER flexibility by addressing the growing need for streamlined and secure data exchange of CER data between organisations, improving operational transparency, and enabling market efficiencies by providing a robust and adaptable data sharing capability. It aims to empower consumers' choice, improve the reliability of the National Electricity Market (NEM), and enable the market to make better-informed decisions that support grid stability and efficient energy use.

The Consultation Paper outlined options for use case functionality, data sharing capability, ownership and governance frameworks of a CER Data Exchange, supported by stakeholder feedback and preferences expressed at two in-person industry workshops, many Expert Working Group (EWG) meetings and bilateral stakeholder meetings. Early stakeholder input on implementation considerations were also sought in this paper. The proposed options were co-designed with more than 170 stakeholders from across the energy sector over the past six months.

Written submissions are a key stage in this consultation process to confirm organisational views and provide an opportunity for broader stakeholder perspectives outside of those who have participated in the Expert Working Group and open in-person workshops. We highly appreciate the level of input and interest shown in this reform program. Submissions will be considered for the next project phase: drafting of the high-level design and implementation roadmap of the CER Data Exchange, which will be presented in 2025 at the third workshop and EWG meetings for further stress testing and feedback.

We received 23 written submissions from a broad range of stakeholders – including retailers, distribution network service providers (DNSPs), industry associations, aggregators, technology providers, original equipment manufacturers (OEMs) and advisors.

These submissions and more information about this reform project, including a copy of the Consultation Paper, is available on the AEMO project webpage.[1]

AEMO thanks all stakeholders who have engaged in this public consultation process, as well as the open in-person workshops and Expert Working Group that made this possible. We look forward to continuing to consult with industry, consumers, and other stakeholders into 2025 for the remainder of the CER Data Exchange project.

## Next steps

Submission feedback will be a key input into the high-level design and implementation roadmap presented at the third workshop, which will be held in early March 2025.

We will continue to meet with stakeholders to test views and the implementation roadmap, including through our ongoing EWG meetings. We welcome further bilateral discussions with stakeholders.

The High-level Design Report and Knowledge Sharing report will be published in April 2025.

1 See: AEMO | CER Data Exchange Industry Co-Design

# Contents


| | | |
|---|---|---|
| Executive summary | | 3 |
| 1 | Introduction | 6 |
| 1.1 | What's in it for consumers? | 6 |
| 1.2 | Co-design process | 7 |
| 1.3 | Submissions overview | 8 |
| 2 | Summary of submissions | 9 |
| 2.1 | Broad Industry Support for Implementing a CER Data Exchange | 9 |
| 2.2 | Use Case Functionality | 9 |
| 2.3 | Data Sharing Capability | 10 |
| 2.4 | Ownership, Operations & Oversight | 11 |
| 2.5 | Data Governance | 12 |
| 2.6 | Implementation Considerations | 13 |
| 2.7 | Summary of considerations identified by stakeholders | 15 |
| 3 | Next steps | 17 |
| 3.1 | How this feedback will be considered | 17 |
| 3.2 | Focus areas for further consultation | 17 |
| 3.3 | Upcoming consultation activities | 18 |
| Glossary and Abbreviations | | 20 |

# 1 Introduction

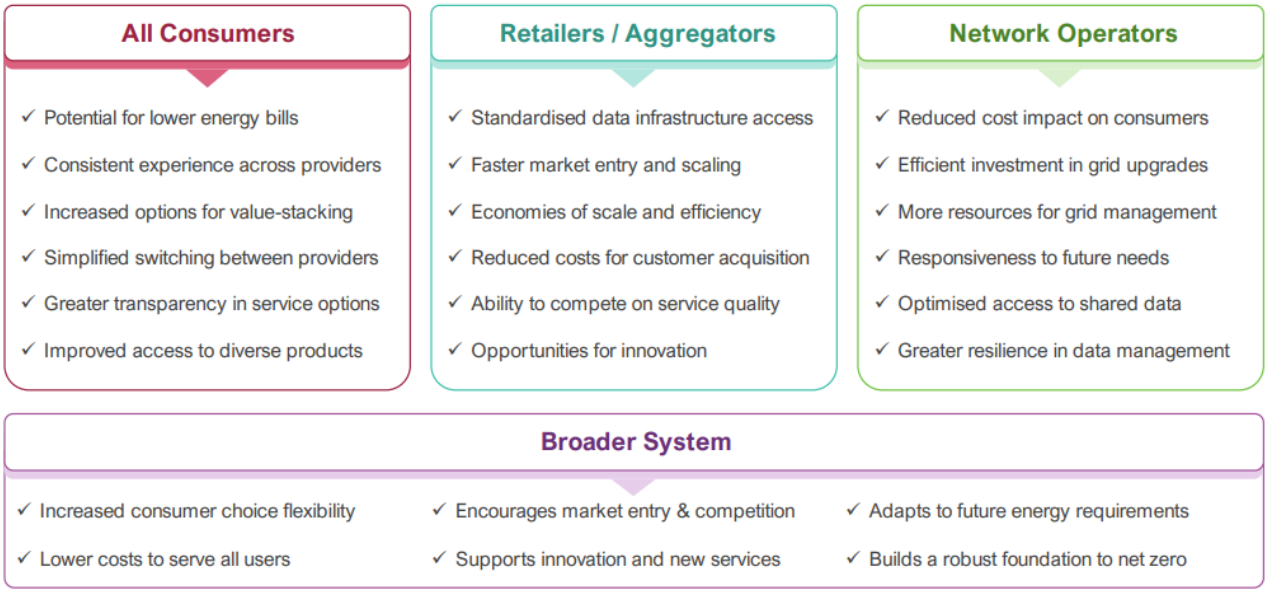
## 1.1 What's in it for consumers?

The CER Data Exchange is envisioned as a secure, standardised system to facilitate the exchange of CER-related data between organisations (org-to-org), such as network operators, retailers, aggregators, customer agents and others. It is intended to streamline data sharing across the energy sector, improving coordination and enabling better integration of CER. While it will not be the sole method for transferring CER data, it offers a common, scalable solution to improve efficiency and reduce the duplication and cost of data-sharing processes.

Currently, CER data is transferred through a network of fragmented, bespoke systems. As Australia progresses toward a net-zero energy future, the transition to a more decentralised energy system and corresponding rapid growth of CER, including rooftop solar, battery storage and electric vehicles, requires a reimagined energy system. Decentralisation is more than simply adding new technologies; it signifies a shift where consumers are active participants and decision makers in energy generation, storage, and consumption. This transition relies heavily on coordination among many more organisations than today, supported by robust, transparent data flows to manage the complexities of a diverse energy system.

By implementing standard integrations and transactions, the intent of the CER Data Exchange is to reduce reliance on fragmented, point-to-point connections that often complicate and add cost to exchange data. A CER Data Exchange would support the standardisation and streamlined data coordination across industry, simplifying CER integration and reducing costs by enabling compatibility across systems. By providing unified access to consistent and current CER data, a CER Data Exchange could encourage participation in flexible energy services and reduce barriers to entry – thereby enabling fast development of new CER flexibility services.

**Figure 1: Summary of benefits of the CER Data Exchange**



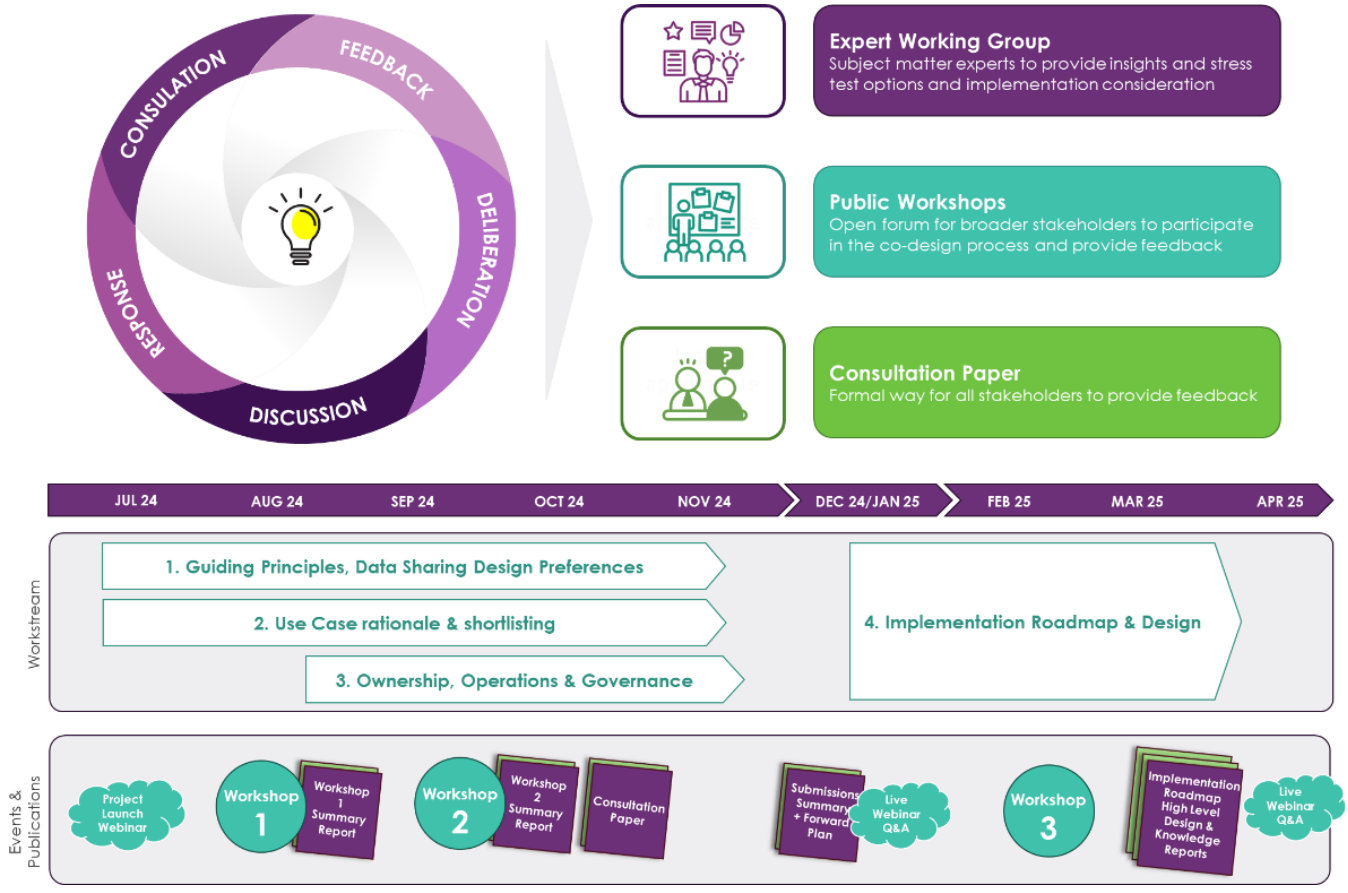
Although the CER Data Exchange primarily supports organisation-to-organisation data sharing, addressing these issues will benefit end-users of the power system. For example, CER customers will benefit from improved and more diverse service offerings at lower cost and reduced overall bills with increased access to 'rewards' for more actively participating in energy markets. Those without CER will benefit from cost savings from a more efficient power system (Figure 1).

## 1.2 Co-design process

Through previous CER integration trials, like Project EDGE,[2] some industry stakeholders requested the desire to have input to the development of the CER Data Exchange concept. This stakeholder feedback, in addition to the complexity of the energy landscape with its diverse stakeholder interests and technical challenges, informed AEMO's decision to adopt a co-design process.

The Project team has undertaken extensive engagement with stakeholders to explore the various trade-offs of various design choices and evaluated the preferences for priority use cases to best achieve the long-term interests of all consumers. The co-design process has involved consumer advocacy groups, aggregators, customer agents, network operators, retailers, technology providers, Original Equipment Manufacturers (OEMs), industry bodies, government, and market bodies.

**Figure 2: Consultation process and stakeholder engagements**




[2] See: AEMO | Project EDGE

This collaborative industry effort aims to ensure that the CER Data Exchange's design preferences reflect a broad spectrum of interests and operational needs. We have sought to be transparent, inclusive, and actively engage with stakeholders to ensure the CER Data Exchange addresses real-world challenges, while balancing regulatory compliance, operational efficiency, and consumer benefit considerations.

Prior to the release of the Consultation Paper, we involved more than 170 stakeholders from across the energy industry in this co-design process through open workshops, public webinars, and an Expert Working Group (EWG) (Figure 2).

## 1.3 Submissions overview

A summary of the key themes and issues raised in the 23 submissions received is provided in Section 2.

AEMO thanks all stakeholders for their feedback to the Consultation Paper, and involvement in the CER Data Exchange co-design project to date. Section 3 outlines next steps in the process.

Table 1 lists the stakeholders that provided submissions in response to the Consultation Paper.

**Table 1: Stakeholders who provided submissions**

| | | | |
|---|---|---|---|
| AGL | Clean Energy Council | ENGIE | Origin |
| Alinta Energy | CitiPower, Powercor and United Energy | Ergon Energy Network and Energex | Red and Lumo |
| Ausgrid | CS Energy | Evergen | SMA-Australia |
| AusNet Services | Electric Vehicle Council | Greensync | SwitchDin |
| Business Council of Australia (BCA) | Energy Networks Australia | Jemena | TasNetworks |
| C4NET | Energy Users Association of Australia | Nexa Advisory | |

The Consultation Paper was a key aspect of the co-design process, bringing together outcomes from workshops 1 and 2, and building on input from the EWG, undertaken since mid-2024. Released in mid-October, the Consultation Paper provided an accessible avenue for written feedback from energy industry stakeholders to refine the proposed high-level design, governance, and operation models of the CER Data Exchange. Responses to the Consultation Paper, combined with outputs from the final EWG meetings and third industry workshop will be collated to inform the high-level design and implementation roadmap.

AEMO continues to encourage active stakeholder participation in this co-design process to ensure that the final high-level design delivers a robust and adaptable CER Data Exchange that aligns with both consumer and industry needs, and national policy goals.

# 2 Summary of submissions

## 2.1 Broad Industry Support for Implementing a CER Data Exchange

Stakeholders across the industry are generally very supportive of the need to progress the development of a CER Data Exchange. ENGIE states it is “broadly supportive of the development of the CER Data Exchange and has current projects that would likely benefit from a centralised data exchange model”. C4NET offered that "a well-conceived and executed CER data exchange mechanism is a valuable tool in progressing CER uptake, and in doing so increasing consumer agency and the adoption of assets that assist rapid movement towards net zero."

Some stakeholders sought clarification on the purpose of the CER Data Exchange. Energy Networks Association and several of its distribution network service provider (DNSP) members emphasised that they support the platform being intended for business-to-business data exchange, rather than for operational control for network management or system security purposes.

While there is broad support for the initiative, a few stakeholders expressed concerns about whether the benefits would outweigh the costs. Some stakeholders outlined that investments should not be made unless there is high confidence they will return positive value to customers. Some stakeholders, such as Evergen and Nexa Advisory, suggested alternative approaches. Evergen strongly supported the goal but preferred a standards-based approach over a CER Data Exchange approach.

Overall, the industry is broadly aligned on the need to implement a CER Data Exchange. There are some different views on the scope and optimal delivery model. Continued stakeholder engagement and rigorous analysis will be important to address these detailed implementation considerations to ensure this reform initiative delivers the intended benefits to all consumers.

## 2.2 Use Case Functionality

The stakeholder feedback on use case functionality reveals broad but qualified support for the three priority use cases identified in the Consultation Paper – namely, Sharing Network Limits, Supporting Local Network Services, and Consistent CER Standing Data. Several submissions identify the need for enabling reforms for these use cases and emphasise a rigorous cost impact analysis is required before implementation. Distribution networks, in particular, stress that the CER Data Exchange should not replace existing operational control systems, especially for network limits and emergency backstop mechanisms.

Stakeholders expressed varying levels of support for the specific use cases and implementation timelines. Sharing Network Limits garnered strong backing, though many noted the need to first harmonise standards like CSIP-Aus implementation. Views were mixed on Supporting Local Network Services, with some suggesting the market is too immature, while others see value contingent on addressing existing barriers. Consistent CER Standing Data received the strongest support as a foundational use case, several stakeholders suggested improving the existing DER Register rather than building an entirely new system.

For example:

- GreenSync states that even though the Sharing Network Limits and Supporting Local Network Services are important, Consistent CER Standing Data is foundational for the CER Data Exchange.
- C4NET submits that while the Local Network Services use case will almost certainly be needed, the ability to act on the data is limited due to the constrained market mechanisms for aggregators and VPP operators.
- AusNet Services notes the Local Network Services use case may be one where commercially available flexibility platform arrangements could currently provide much of the functionality.
- SwitchDin states the Supporting Local Network Services use case could be addressed later in Phase 1 or in the next phase.

Most stakeholders are less supportive of the strategic and other use cases identified in the Consultation Paper, with views varying between those supportive and those highlighting that the need for strategic use cases is not fully justified. Most stakeholders reiterated the need to implement priority use cases first and learn/understand the value prior to expanding.

Overall, the feedback demonstrates a clear consensus around starting with a narrow scope focused on proven use cases, while maintaining flexibility to expand over time. Some stakeholders endorsed the Clean Energy Council's proposal for CSIP-Aus testing and certification as an additional priority use case to help standardise the implementation of network limits and emergency backstop mechanisms. Overall, stakeholders are seeking an implementation approach that targets well-defined problems with clear benefits and supports quick wins, while avoiding duplication of existing systems and ensuring the necessary complementary reforms are in place to support successful outcomes.

While limited additional or alternative use cases were identified, some stakeholders did propose options requiring further consideration. These include Flexibility Service Requests and Visibility of CER Customer Choices (Alinta), Scaling Dynamic Network Pricing (Ausgrid), Flexibility Service Requests, Visibility of CER Customer Choices, and Streamlined CER Portfolio Data Access (GreenSync), transfer of solar generation and battery SoC data (C4NET), improving the DER Register (SMA-Australia), and grid data collaboration and standardised billing information (Victorian power networks).

## 2.3 Data Sharing Capability

The stakeholder feedback on data sharing capability reflects a consistent emphasis on essential foundational elements, while maintaining flexibility for future expansion. The key capabilities identified as essential across submissions include information security, format standardisation, data governance, access management and platform interoperability. Stakeholders particularly emphasised that information security and privacy protections must be robust but not overly complex, as these are critical for building trust and encouraging participation.

However, there were varying views on whether a common data exchange is the optimal solution. Several stakeholders argued that further consideration should be given to a standards-based approach (although it is noted this topic was addressed at EWG meetings and the workshops, and there was general acceptance that a standards-based approach will not address the identified problem). Other stakeholders like Alinta Energy support the proposed capability set but emphasise the need to consider implementation costs and ensure essential capabilities are prioritised over "nice-to-have" features.

Stakeholders broadly agree that capabilities like advanced data validation, custom data formats and real-time processing should be considered optional or implemented in later phases. There is strong support for leveraging existing systems and standards where possible, with several submissions highlighting the need to align with and build upon AEMO's Industry Data Exchange (IDX) initiative. Additional capabilities suggested by stakeholders include message receipting and confirmation functionality, standardised consent management, and the ability to verify data quality. Most importantly, stakeholders emphasise that the CER Data Exchange should act solely as a data facilitator rather than data processor or storing data itself, with data ownership and management remaining with the originating organisations.

## 2.4 Ownership, Operations & Oversight

### Ownership and Operations

Stakeholders expressed a clear preference for an AEMO-led model to own and operate the CER Data Exchange. The new independent government agency option was second preference. The industry-led consortium model was viewed less favourably due to concerns about potential commercial bias and the risk of larger players dominating the governance process.

The AEMO-led model was seen as the most cost-effective and efficient, leveraging AEMO's existing expertise and infrastructure. However, some stakeholders were concerned about potential operational bias given AEMO's other core responsibilities. The independent government agency model was viewed as the most impartial and consumer-focused, but stakeholders recognised the higher setup costs and potential for slower decision-making.

Some stakeholders suggested alternative models, including the data exchange being owned and operated by an AEMO affiliated entity (e.g., AEMO Services), or an industry consortium. The Victorian Power Networks (CitiPower, Powercor and United Energy) consider an industry consortium model could allow for faster implementation of use cases and be more efficient, but it would require strong governance and oversight to prevent domination by the largest market participants.

There is significant support from the ENA and several of its members to leverage existing infrastructure, such as the IDX and Identity and Access Management (IDAM) programs. Some networks submitted that the IDX/IDAM program should be leveraged as much as possible in developing the pathway to the future CER Data Exchange, as this would help lower costs. However, Ergon Energy Network and Energex noted that the strategic requirements for futureproofing may not have been sufficiently considered in the planning and concept design for IDX.

Overall, stakeholders favoured models that would maximise efficiency, leverage existing infrastructure and maintain impartiality, whilst acknowledging the trade-offs between the different options. The industry appears aligned on the need for a well-governed, cost-effective, and strategically designed solution.

### Oversight

Stakeholders emphasised the need for robust oversight mechanisms, regardless of the ownership model, to ensure transparency, accountability, and alignment with the National Electricity Objective (NEO). There was a strong preference for significant industry involvement and consultation in the oversight process to balance AEMO's operational role.

Establishing a dedicated authority does not appear to be a suitable option to incur the high start-up costs and long implementation times to develop a new authority when there are existing market bodies that have established administrative functions and industry expertise. Some noted that a CER Data Exchange may not explicitly solve existing issues of data quality, completeness, consistency or ownership, given it is not a system of record.

Some stakeholders suggested that existing regulators like the AER would be best placed to provide oversight, as this would leverage established frameworks and expertise. Others consider a new dedicated oversight body may be required to ensure true independence, although this is seen by other stakeholders as potentially adding complexity and delays. Overall, the key priority was ensuring impartial governance that maintains stakeholder trust.

## 2.5 Data Governance

Stakeholders discussed several potential data governance models for the CER Data Exchange. The main options presented were:

- **Model A – Exchange Operator as Data Governance Authority:** Where the CER Data Exchange operator would also oversee data governance. This could enable quicker decision-making, however stakeholders raised concerns about potential conflicts of interest.
- **Model B – Industry Collaborative/Association as Data Governance Authority:** An industry-led body managing governance. This was seen as promoting collaboration, but stakeholders worried it may struggle to ensure consistent compliance.
- **Model C – Existing Market Body/Regulator as Data Governance Authority:** A recognised regulator like the AER overseeing governance. This was viewed as providing strong compliance and public trust, but potentially less flexibility.
- **Model D – New CER Data Governance Authority:** Establishing a new independent agency to manage data governance. This was seen as the most impartial, but with higher setup costs and slower responsiveness.

Stakeholders indicated mixed preferences between options A, B, and C. C4NET suggests the Exchange Operator option would be aided by having an industry advisory group to guide. Similarly, AGL submits a hybrid data governance model would be suitable where AEMO as a system operator would make decisions related to data security and access, while an industry collaborative (like the B2B working group) would develop processes to uphold data quality. Stakeholders broadly agreed that the data governance model should balance the need for trust, compliance, and flexibility.

Stakeholders emphasised the importance of regular, transparent stakeholder engagement to support the integration of new use cases over time. This could involve an industry committee or steering group providing input on standards, compliance requirements, and expanding the CER Data Exchange's capabilities.

While data quality was not directly in scope of the Consultation Paper questions, stakeholders highlighted its critical importance. There was a view that the CER Data Exchange should focus on technical data validation and facilitating high-quality data sharing, while data owners should remain accountable for ensuring the accuracy of the information they provide.

## 2.6 Implementation Considerations

### Phased Approach to Implementation

Stakeholders broadly agreed with a phased approach to implementing the CER Data Exchange. This sequenced rollout approach was seen as a prudent way to deliver immediate benefits, manage risks, and keep costs down, by starting with a narrow focus on priority use cases before gradually expanding capabilities over time.

Some stakeholders suggested the initial "Foundational Phase" should concentrate on proving the concept through pilot testing and regular industry feedback. This would help build confidence in the core infrastructure before moving to the "Expansion Phase" and adding more advanced functionalities. There was also support for a final "Optimisation and Scaling Phase" to refine processes, integrate evolving standards, and ensure the CER Data Exchange remains relevant and effective.

Stakeholders highlighted the need to align the implementation of the CER Data Exchange with related reform initiatives and identify dependencies with other programs. For example, ENA saw a risk that the high number of in-flight and near-future rule changes might lead to overlaps or conflicts between regulatory reform initiatives. Jemena and Red and Lumo note the importance of aligning the CER Data Exchange with broader NEM reform initiatives and the progress of various regulatory changes that will complement or drive the use of the CER Data Exchange.

Some also emphasised that the implementation timeline will be challenging, with the next five years heavily scheduled with work associated with NER changes, AEMO's post-2025 roadmap, and internal technology refresh programs. They also highlight the need to integrate the CER Data Exchange with their ongoing efforts around active management of low voltage networks and the introduction of flexible contract connections.

### Start Small, Be flexible, and Build Capability Over Time

Stakeholders largely agreed that the CER Data Exchange should be designed with narrow capability initially, with the flexibility to expand in the future. This approach was seen as the best way to deliver immediate benefits and build confidence, while allowing the system to adapt to evolving customer and market needs.

Several stakeholders endorsed this phased and iterative implementation model. CS Energy supported a CER Data Exchange that focuses on existing functionality gaps and complements, rather than duplicates, existing systems. Some retailers stated that establishing an iterative and adaptable delivery process is key due to uncertainty around the value the CER can potentially deliver. Others advocated for a "quick win and test" concept, noting that many non-functional requirements will emerge as usage grows. Many agreed the Exchange should have the flexibility to expand over time as new evidence and use cases emerge.

Assessing cost in the decision to build capability over time was raised specifically by some stakeholders, advocating for containing costs and not building CER Data Exchange capability in anticipation of future use cases with limited evidence of their benefits. Ausgrid also recommended that subsequent use cases be justified on a case-by-case basis.

Overall, the industry appears aligned on the need for a phased, and iterative approach to implementing the CER Data Exchange. This will allow the project to start small, prove the concept, and build capability over time in alignment with broader industry reforms and evolving requirements.

## Regulatory Alignment and Cost Recovery

Stakeholders emphasised the importance of aligning the CER Data Exchange's implementation with broader regulatory reforms in the energy sector. There were questions about potential overlaps or conflicts between this initiative and other concurrent policy changes. To address this, stakeholders recommend a holistic review of the regulatory landscape to ensure the CER Data Exchange's timing and capabilities complement, rather than complicate, other industry initiatives.

On cost recovery, stakeholders generally prefer a hybrid model that includes both user contributions and some government support, particularly for the initial development phase. They considered this would help make the CER Data Exchange accessible to all market participants, including smaller players, while providing a fair mechanism for recouping costs. Ongoing operational expenses could then transition towards a more user-pays approach as the benefits become clearer.

## Calls for Government Support

Several stakeholders proposed that the CER Data Exchange should initially be government-funded, with a transition to a user-pays approach over time. This government support was seen as important to recover the initial costs and establish the CER Data Exchange as a public good.

For example:

- Alinta supports government cost recovery given the CER Data Exchange is an initiative under the CER Roadmap.
- Origin advocates for government assistance to establish and initially operate the CER Data Exchange. SMA-Australia states that since the CER Data Exchange is a proposed public good, funding by taxpayers is the best way to ensure a progressive and equitable funding model.
- Jemena prefers a government-funded model for the first five years of operation, including support for DNSP costs to ensure a level playing field and stabilisation of operations.
- C4NET recommends a development horizon that recognises the need to balance initial requestors bearing costs versus allowing others to benefit without contributing.
- AusNet Services submits that the initial implementation would significantly benefit from seed funding to ensure timely delivery, as a direct cost approach may only be viable once the CER Data Exchange has sufficient maturity and utilisation.
- Ergon Energy Network and Energex suggest that in the shorter term, public funding could help fill the gap between willingness to pay and the foundational costs, while noting that direct cost recovery from users should be the preferred long-term mechanism.
- Ausgrid notes it would need to be able to recover its full efficient costs without penalty under AER efficiency incentive schemes to integrate with and use the CER Data Exchange.

Overall, there was substantial support for government funding to help establish the CER Data Exchange as a public good and ensure equitable cost recovery, especially in the initial rollout phase. Stakeholders recognised the need to transition to a user-pays model over time but emphasised the importance of government support to get the CER Data Exchange off the ground and mitigate the financial impacts on early participants.

### Technical and Operational Challenges

Stakeholders highlight that integrating the CER Data Exchange with existing systems and processes would likely present both technical and operational challenges. Potential issues included the need to align with emerging standards, the complexity of onboarding diverse participants, and the challenge of maintaining data quality and security. Stakeholders suggest that clear technical documentation, robust testing environments, and dedicated support would be crucial to facilitating a smooth adoption process for organisations connecting to the CER Data Exchange.

## 2.7 Summary of considerations identified by stakeholders

Stakeholder submissions to the CER Data Exchange Consultation Paper reveal a diverse range of perspectives on the proposed alternative options, touching on governance, cost, data privacy and technical design. While there is broad agreement on the need for a reliable and efficient data exchange platform to facilitate CER integration, stakeholders vary in their priorities regarding implementation. For example:

- **Governance and Ownership Models:** Stakeholders expressed varying preferences for the ownership model of the CER Data Exchange, with several calling for a balanced and transparent governance framework. Many supported an AEMO-led model due to its existing infrastructure and expertise but stressed the need for an oversight mechanism. Some supported the creation of a secure, scalable platform but stressed that it must remain a business-to-business exchange, not a tool for operational control, to avoid disrupting existing DNSP systems. The need for strong governance, that supports innovation & avoids rigidity, was preferred with balanced regulatory oversight to ensure consumer outcomes.
- **Data Governance and Privacy:** Ensuring secure and compliant data sharing is a central theme. Submissions from stakeholders such as technology providers and aggregators stressed the importance of clearly defining roles, responsibilities, and access controls. A common concern was the lack of clarity on how customer data privacy and consent will be handled, particularly given the evolving Australian privacy framework.
- **Use Cases and Prioritisation:** Many stakeholders emphasised the importance of focusing on immediate priority use cases such as consistent CER standing data and sharing network limits. They argued these use cases could deliver tangible benefits early, laying the groundwork for more strategic applications. Concerns were raised about the practical feasibility of some proposed strategic use cases, with calls to ensure that the value proposition for each is well substantiated before investment.
- **Cost and Funding Models:** Bill impact on customers and cost recovery was a key concern for many stakeholders. They advocated for government funding to cover the initial establishment and early operational phases. Stakeholders stressed the need for a cost impact evaluation to ensure positive outcomes for consumers, particularly in the context of historical projects where benefits were overstated.
- **Technical and Operational Design:** Many stakeholders highlighted technical challenges, including the integration of existing systems and the need for standardised interfaces. Others called for careful attention to interoperability and scalability. Several submissions stressed the importance of adaptability in system design to address the rapidly evolving nature of CER technologies and market dynamics.

- **Consumer Benefits and Participation:** Stakeholders were aligned on the need for the CER Data Exchange to deliver tangible benefits to all energy consumers. Many pointed out that the platform must balance privacy and transparency to encourage widespread participation. Some emphasised that clear communication of consumer benefits is critical to building trust and ensuring adoption.
- **Mandatory vs Voluntary Participation:** The participation requirements might have implications on use case value and the cost recover models. Some submissions highlight that a mandate may required whereas other submissions supported “voluntary participation” for use cases where there are no negative impacts to the market, or non-critical activities.

The submissions reflect strong support for a CER Data Exchange but reveal differing opinions on the best path forward. Key priorities include clear governance, consumer-centric design, and an initial focus on foundational use cases. Ensuring interoperability, scalability, and cost efficiency will be critical as the CER Data Exchange evolves to meet the needs of Australia's energy transition.

# 3 Next steps

## 3.1 How this feedback will be considered

The Consultation Paper invited stakeholders to contribute their insights on the preferred functionalities, use cases, ownership and governance models, and provide feedback on the consultation questions outlined. This has enabled the Project team to collate feedback from a comprehensive representation of industry views. The feedback summarised in Section 2 builds on stakeholder input to the co-design process to date.

Submissions have given us a clear indication of the industry's preferred option for the CER Data Exchange.

The next stage of the process will build on these stakeholder preferences. There are still a number of focus areas for further consideration for the High-Level Design and Implementation Roadmap as outlined below. These areas will be the focus of the third workshop in March 2025. We will continue to meet with stakeholders to test views and the implementation roadmap, including through our ongoing EWG meetings.

All consultation materials, stakeholder written submissions and supporting documentation for the CER Data Exchange Industry Co-Design Consultation Paper are available on the AEMO project webpage.[3]

AEMO thanks all stakeholders who have engaged in this public consultation process, as well as the open in-person workshops and Expert Working Group that made this possible. We look forward to continuing to consult with industry, consumers, and other stakeholders into 2025 for the remainder of the CER Data Exchange project.

## 3.2 Focus areas for further consultation

Building on the feedback from stakeholders, an option that best aligns with industry preferences will be chosen for the next phase of the CER Data Exchange Industry Co-design project to focus on the following key design elements:

- **High-Level Design Report:** We will prepare a comprehensive High-Level Design Report, which will consolidate the learnings and recommendations from the extensive co-design process. This report will detail the industry preferred high-level design for the CER Data Exchange, incorporating all topics presented in the co-design process and the feedback and insights gathered from stakeholders throughout the project.
- **Funding Arrangements:** We will develop options for securing initial establishment and ongoing funding to support the implementation and operation of the CER Data Exchange. This will involve consideration of funding sources and models that can sustainably support the project over the long term.
- **Oversight Arrangements:** We will establish high-level oversight arrangements, including the nomination of an oversight body to provide regulatory oversight. This will help ensure the CER Data Exchange remains aligned with the NEO and broader energy policy goals.

[3] See: AEMO | CER Data Exchange Industry Co-Design

- **Data Governance Framework:** We will further develop the data governance arrangements for the CER Data Exchange with continued collaboration with stakeholders.
- **Implementation Roadmap:** We will deliver a detailed Implementation Roadmap to compliment the high-level design, outlining the phased rollout of the CER Data Exchange. This roadmap will incorporate the learnings from the use case development, assessment of regulatory enablers, related reform initiatives and provide a clear plan for expanding the capabilities of the platform over time.
- **Cost Assessment:** We will undertake a cost evaluation of the industry-preferred option, including assessment of the potential impact on industry. This cost assessment will complement the high-level design and provide transparency regarding the financial implications for stakeholders. The Project team will also evaluate a counterfactual case to a CER Data Exchange investment.
- **Stakeholder Engagement:** Ongoing engagement with the EWG and a third workshop with broader stakeholders will be crucial during this next phase. The Project team will continue to seek feedback and input to refine the high-level design, funding mechanisms, oversight structures and Implementation Roadmap.

By focusing on these key elements, the Project team intends to deliver a comprehensive high-level design and implementation roadmap for the CER Data Exchange that aligns with stakeholder preferences and needs in Australia's evolving energy sector. The continued collaborative approach with stakeholders will help ensure the high-level design best delivers against the priorities of consumers, industry, and policymakers.

## 3.3 Upcoming consultation activities

In addition to this Consultation Submissions Summary Report, the Project team is hosting a webinar on Tuesday 10 December 2024 at 3pm (AEDT) to provide an update on:

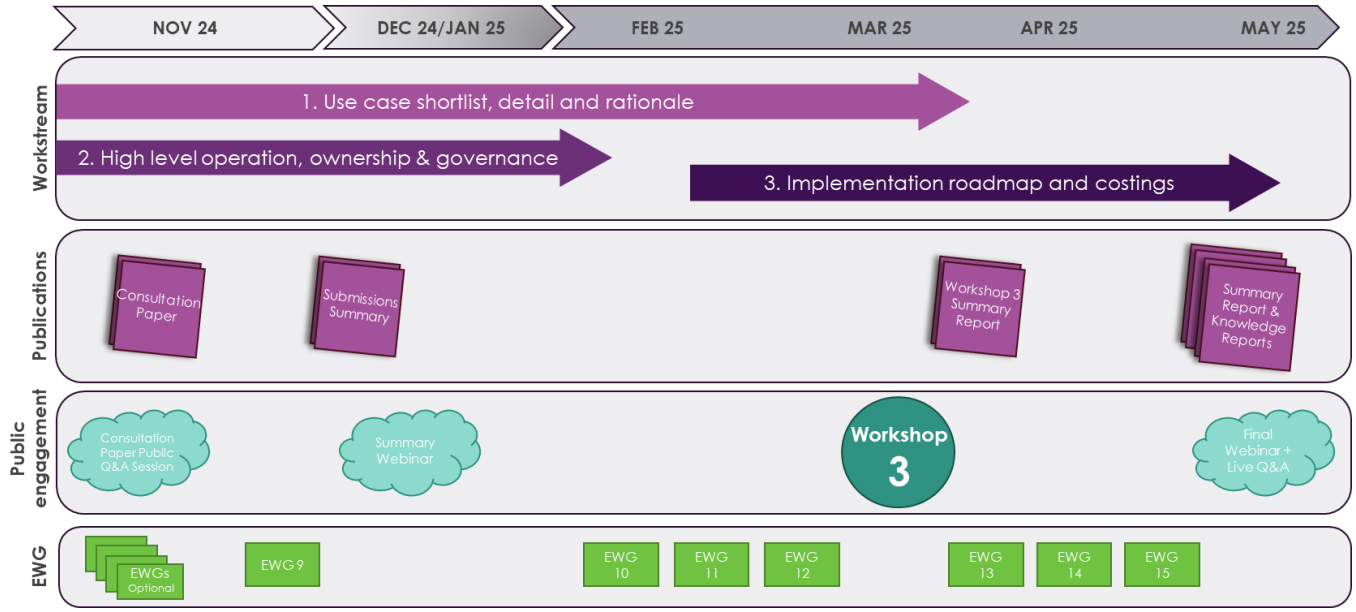
- feedback received through submissions to the Consultation Paper
- how this feedback will shape our ongoing co-design on the high-level design of the CER Data Exchange and Implementation Roadmap
- the industry-preferred option, next steps and opportunities for stakeholders to further contribute to the co-design process in 2025.

Register your attendance using this link. The recording and presentation slides will be made available on the AEMO project webpage following the webinar.

Following this, AEMO and industry partners will hold the third and final industry workshop in early-March 2025. This workshop will focus on solidifying industry alignment, refining cost-assumptions and recovery mechanisms, and expanding on the required regulatory and policy reforms. During Workshop 3, the Project team will also consult on questions raised through this Consultation Paper and key areas identified in submissions which require further exploration.

An outline of the upcoming consultation activities and project milestone for the remainder of the co-design process are provided in Figure 3.

**Figure 3: Upcoming consultation activities and project milestones**



# Glossary and Abbreviations

| Term | Definition |
|---|---|
| **AEMC** | Australian Energy Market Commission |
| **AEMO** | Australian Energy Market Operator |
| **AER** | Australian Energy Regulator |
| **ARENA** | Australian Renewable Energy Agency |
| **BAU** | Business as usual |
| **Capex** | Capital expenditure |
| **CER** | Consumer energy resource |
| **DNSP** | Distribution network service provider |
| **DOE** | Dynamic operating envelope |
| **DSO** | Distribution system operator |
| **ESB** | Energy Security Board |
| **EWG** | Expert Working Group |
| **FCAS** | Frequency Control Ancillary Services |
| **FRMP** | Financially responsible market participant |
| **IDAM** | Identity and Access Management |
| **IDX** | Industry Data Exchange |
| **ISP** | Integrated System Plan |
| **NEM** | National Energy Market |
| **NEO** | National Electricity Objective |
| **NER** | National Electricity Rules |
| **OEM** | Original Equipment Manufacturers |
| **Opex** | Operational expenditure |
| **Victorian power networks** | CitiPower, Powercor and United Energy |
| **VPP** | Virtual Power Plant |