

# STRUCTURE OF PARTICIPANT FEES FOR THE CDR DECLARED NEM PROJECT

June 2023

Final Report and Determination





# Important notice

## Purpose

Under clause 2.11(be) of the National Electricity Rules (NER), the introduction and facilitation of the Consumer Data Right (CDR), requiring AEMO to carry out CDR functions, is taken to have been determined to be a declared NEM project under clause 2.11.1(ba) of the NER (CDR declared NEM project). AEMO has completed its consultation on the determination of the structure of an additional Participant fee to recover costs for the introduction and facilitation of the CDR and the performance of the CDR functions by AEMO as required by clause 2.11(bf) of the NER.

This document has been prepared by AEMO for the purposes of clauses 2.11(bf) and 8.9 of the NER and has effect only for the purposes set out in the NER. The NER and the National Electricity Law (NEL) prevail over this document to the extent of any inconsistency.

This publication has been prepared by AEMO using information available at 23 June 2023.

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## Version control

Version	Release date	Changes
#1	23/06/2023	

# Executive summary

The publication of this Final Report and Determination (Final Report) concludes the Rules consultation process conducted by AEMO to determine a Participant fee structure for the Consumer Data Right (CDR) declared NEM project.

The CDR is implemented via Part IVD of the *Competition and Consumer Act 2010* (Cth). Under the *Competition and Consumer (Consumer Data Right) Rules 2020*, the CDR applies to the energy sector and AEMO is a secondary data holder. In November 2022, amendments were made to the National Electricity Law (NEL) and National Electricity Rules (NER) which enable cost recovery by AEMO for its new CDR related functions. The CDR amendments to the NER (which became effective on 10 November 2022) introduced new clauses 2.11.1(be) and 2.11.1 (bf) into the NER. The introduction and facilitation of the CDR, requiring AEMO to carry out CDR functions, is taken to have been determined to be a CDR declared NEM project under clause 2.11.1(ba) of the NER (a CDR declared NEM project).

On 26 April 2023, AEMO published the Notice of Second Stage Consultation and the Draft Report and Determination (Draft Report) to determine a Participant fee structure for the CDR declared NEM project. AEMO received one submission (from AGL) to its Draft Report.

AGL supported AEMO's proposal to recover costs from Retail Market Customers on a \$/NMI basis from 1 July 2023, noting that greater visibility of fees associated with the CDR Reforms would be achieved if these costs are reported as a separate line item within the existing Electricity Retail Markets fee. AEMO has responded to AGL's submission in section 4.1, describing how AEMO will provide greater transparency of CDR costs.

As there were no major objections to the draft proposal, AEMO has not proposed any changes in this Final Report.

AEMO's final determination for a Participant fee structure for the CDR declared NEM project is to use the existing Electricity Retail Markets Fee – charging Market Customers with a retail licence and levied on a per connection point basis, per week, from 1 July 2023 to 30 June 2026.

Stakeholders should note that this consultation relates only to the determination of the Participant fee structure for the CDR declared NEM project. The actual amount to be charged for this project is subject to a separate consultation through AEMO's annual budget process.



# Contents

Executive summary	3
1 Stakeholder Consultation Process	5
2 Background	6
2.1 NER requirements	6
2.2 Context for this consultation	7
2.3 Second Stage Consultation	9
3 Summary of Key Issues for Consultation	10
4 Final structure of the CDR declared NEM project Participant fee	11
4.1 Stakeholder submissions	11
4.2 AEMO's final determination and rationale	11
A1. Fee structure principles	13
A2. Registered Participants (current)	16

## Tables

Table 1 Consultation timeline	5
Table 2 CDR implementation timeline	9
Table 3 Summary of key consultation issues	10

## Figures

Figure 1 P2P data access model	8
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# 1 Stakeholder Consultation Process

As required by the National Electricity Rules (NER), AEMO consulted on a structure for Participant fees for the Consumer Data Right (CDR) declared NEM project in accordance with clauses 2.11.1(be) and (bf) of the NER and the Rules consultation process in clause 8.9 of the NER.

AEMO's timeline for this consultation is outlined below.

**Table 1 Consultation timeline**

<b>Deliverable</b>	<b>Indicative date</b>
<b>Consultation Paper and Notice of First Stage Consultation published</b>	Friday 24 February 2023
<b>First Stage Submissions closed</b>	Friday 24 March 2023
<b>Draft Report and Notice of Second Stage Consultation published</b>	Wednesday 26 April 2023
<b>Submissions due on Draft Report</b>	By Wednesday 24 May 2023
<b>Final Report published</b>	Friday 23 June 2023

Stakeholders should note that this consultation relates only to determining the structure for an additional Participant fee for recovery of the costs of the CDR declared NEM project, including the Registered Participants that will be charged the fee, as well as the start date for recovery and the period or periods over which recovery will occur.

## 2 Background

### 2.1 NER requirements

AEMO consults on its proposed fee structure for Participant fees in accordance with clause 2.11 of the NER. Under the Rules, AEMO only has the power to recover fees from registered participants.

In determining the structure of Participant fees, AEMO must have regard to the NEO. In addition, the structure of Participant fees must, to the extent practicable, be consistent with the following principles which are stipulated in the National Electricity Law (NEL) and the NER, and herein referred to in this document as the Fee Structure Principles

- The structure of Participant fees should be simple.
- The components of Participant fees charged to each registered participant should be reflective of the extent to which AEMO's budgeted revenue requirements involve that registered participant.
- Participant fees should not unreasonably discriminate against a category or categories of registered participants.
- Fees and charges are to be determined on a non-profit basis that provides for full cost recovery.
- The structure of the Participant fees should provide for the recovery of AEMO's budgeted revenue requirements on a specified basis.


Further details in relation to the Fee Structure Principles is set out in Appendix A.

The operation of clause 2.11.1 of the NER also needs to be understood in the context of its surrounding provisions which deal with budgets and the payment of Participant fees (which are consulted on separately to this consultation and process):

- Under clause 2.11.3, AEMO is required to prepare and publish its budgeted revenue requirements.
- That budget must take into account and identify revenue requirements for the matters set out in clause 2.11.3(b).
- Some, but not all of these matters are referred to in the components of Participant fees specified in clause 2.11.1(c).
- However, AEMO may adopt 'components' of Participant fees which are different to or more than those set out in clause 2.11.1(c).
- Clause 2.11.1(b)(2) provides that Participant fees should recover the budgeted revenue requirements for AEMO determined under clause 2.11.3 in accordance with specified principles.
- Under clause 2.11.2, AEMO may charge Registered Participants the relevant components of Participants fees in accordance with the structure of Participant fees.

Consequently, clauses 2.11.1 to 2.11.3 of the NER:

- require AEMO to determine the structure of Participant fees according to certain rules;
- require AEMO to determine AEMO's budgeted revenue requirements according to certain rules; and
- empower AEMO to recover the budgeted revenue requirements by charging Registered Participants in accordance with the determined structure of Participant fees.



Under clause 2.11.1(be) of the NER, the introduction and facilitation of the CDR, requiring AEMO to carry out CDR functions, is taken to have been determined to be a declared NEM project under clause 2.11.1(ba) of the NER (CDR declared NEM project). Clause 2.11.1(bf) of the NER provides that clause 2.11.1(bb) of the NER applies to the CDR declared NEM project and requires AEMO to comply with the NER consultation procedures when making a determination under that clause in respect of the CDR declared NEM project. Clause 2.11.1(bb) requires AEMO to determine the structure of an additional Participant fee to be used in the recovery of costs associated with the CDR declared NEM project until the next general determination of all Participant fees is made under clause 2.11.1(a), and the start date for recovery and the period or periods over which recovery will occur for the CDR declared NEM project.

## 2.2 Context for this consultation

### 2.2.1 The Consumer Data Right Reforms

The CDR is an important Commonwealth reform implemented via Part IVD of the *Competition and Consumer Act 2010* (Cth) that will empower consumers to have greater control over their data and is seen as a key reform in moving to a digital economy. Through the reform, consumers and small businesses will be given the right to share their data between providers by using automated data technology.

Under the *Competition and Consumer (Consumer Data Right) Rules 2020*, the CDR was applied to the energy sector and AEMO became a secondary data holder. In November 2022, the NER were amended by the *National Electricity Amendment (Consumer Data Right) Rule 2022* to enable AEMO to recover its costs associated with the introduction and facilitation of the CDR. Collectively these changes are referred to in this paper as the CDR Reforms.

The CDR Reforms aim to give energy consumers access to and greater control over their energy consumption data to enable them to make more informed decisions about their energy supply and investments in distributed energy resources (DER) and energy-efficient appliances. It is expected that this reform will enable better pricing and potential innovation of products and services via third parties.

Under the CDR Reforms, various parties will be required to fulfil the CDR data flow requirements. These include:

- Consumers;
- Accredited Data Recipients (ADR);
- Data Holders (Retailers); and
- Secondary Data Holders (AEMO).

Retailers included as Data Holders are:

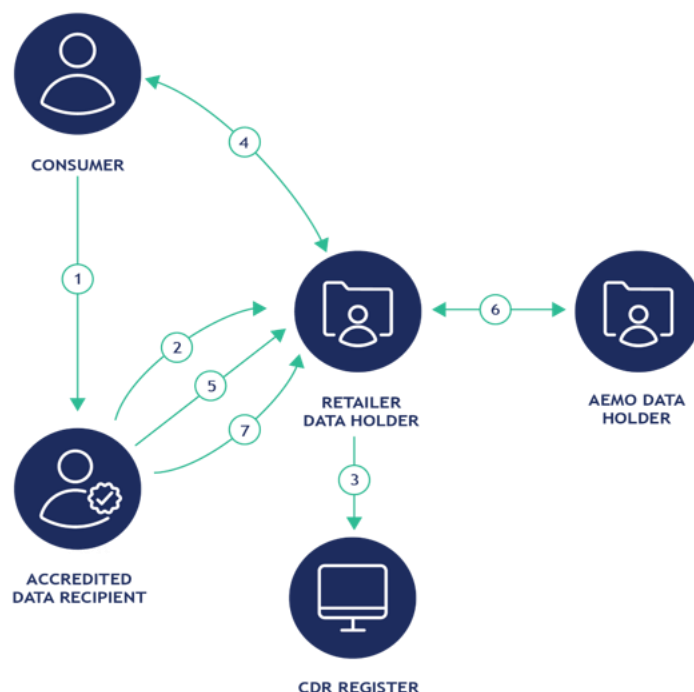
- Initial retailers:
  - AGL, Energy Australia, and Origin Energy
- Larger retailers:
  - Those retailers that had 10,000 or more small customers on the day the *National Electricity Amendment (Consumer Data Right) Rule 2022* was made (3 November 2022); and

- Those retailers that have 10,000 or more small customers at all times during a financial year that begins on or after the amendment day is also a larger retailer on and from the day 12 months after the end of that financial year.

Smaller retailers in the CDR Rules, that is those below the threshold of 10,000 small customers, will not have data holder obligations unless they become accredited as an accredited data recipient or wish to participate voluntarily as data holders.

The CDR Reforms will implement a peer-to-peer (P2P) data access model where AEMO is designated as a Data Holder to enable consumers to share their information on DER and historical electricity usage that may not be available to the current retailer. Figure 1 below outlines the P2P data access model that will be implemented including detail on the workflow.

**Figure 1 P2P data access model**



Workflow:

1. The consumer consents to an accredited data recipient (ADR) obtaining their data.
2. The ADR contacts the retailer Data Holder (retailer DH), seeking access to the consumer's data.
3. The retailer DH authenticates the ADR using the CDR Register.
4. The consumer is redirected to the retailer DH's authentication and authorisation service. The retailer DH authenticates the identity of the consumer via a one-time password. The Consumer authorises the retailer DH to disclose their data to the ADR.
5. The ADR requests a specific set of data that is covered by the authorisation.
6. The retailer requests the relevant data, covered by the authorised consent, from AEMO as a data holder (AEMO DH). AEMO DH provides the requested data to the retailer DH.
7. The consumer's data is shared between the retailer DH and the ADR.



Implementation of the P2P data access model is divided into four tranches as shown in Table 2 below and is based on retailer type and complexity of data, where complex data requests include those:

- Made on behalf of a large customer; or
- Made on behalf of a secondary user; or
- Related to a joint account or a partnership account.

**Table 2 CDR implementation timeline**

Tranche	Commencement date	Participants	Complexity of data
1	15 November 2022	AER / Victorian Government, AEMO, Initial Retailers	Excludes complex data requests
2	15 May 2023	Initial Retailers	Includes complex data requests
3	1 November 2023	Larger retailers	Excludes complex data requests
4	1 May 2024	Larger retailers	Includes complex data requests

Program cost estimates and cash flows from 1 July 2023 have been developed and provided throughout this consultation. AEMO notes that since the publication of the Draft Report and Determination, ongoing costs have been updated to \$600,000 per annum. Actual costs to be reflected in AEMO's annual budget process are currently outlined in the FY24 Budget and Fees report available at [AEMO | Energy market fees and charges](#).

## 2.3 Second Stage Consultation

AEMO issued a Notice of Second Stage Consultation and Draft Report and Determination on 26 April 2023.

The Draft Report proposed a structure of Participant fees to apply to the CDR declared NEM project for stakeholders to provide feedback on, noting that the consultation does not apply to the actual amount charged for each fee.<sup>1</sup>

AEMO received one submission, from AGL, to this stage of consultation. Feedback received from AGL has been outlined in more detail in section 4.1.

<sup>1</sup> The latter is to be determined on an annual basis, via the AEMO budgeting process.

### 3 Summary of Key Issues for Consultation

The table below provides an overview of the main issues that were consulted on and the approach proposed in the Draft Report. It also includes AGL’s feedback on AEMO’s draft proposal.<sup>2</sup>

**Table 3 Summary of key consultation issues**

Consultation matter	Summary of key issues
Participant fee structure (including fee metrics and Registered Participants to be charged)	<ul style="list-style-type: none"> <li>Under clauses 2.11.1(be) and 2.11.1(bb) of the NER, AEMO is required to determine the structure of an additional Participant fee for the CDR declared NEM project.</li> <li>In its Draft Report AEMO proposed to apply the structure used in the existing Electricity Retail Markets fee to recover costs of the CDR declared NEM project.</li> <li>Performance of CDR functions by AEMO will occur via interactions with AEMO’s retail systems which are accessed by Retailers.</li> <li>The existing metric for the Electricity Retail Markets fee is a \$/NMI metric because AEMO’s electricity retail markets capability is built to handle a total number of individual meters. The actual energy flowing through the meters is incidental.</li> <li>Retailers are the only Registered Participant category that have a role in, and benefit from, the CDR Reforms.</li> <li>AGL’s submission noted recovery from retail Market Customers on a \$/NMI fee basis utilising the existing Electricity Retail Market fee would be adequate if the costs associated with the CDR Reforms are reported as a separate line item within this fee.</li> </ul>
Cost recovery commencement date and recovery period	<ul style="list-style-type: none"> <li>The implementation of the CDR Reforms commenced in November 2022, with the expectation for all four tranches to be completed by the end of May 2024.</li> <li>A cost recovery start date of 1 July 2023 was proposed in the Draft Report so that costs already incurred in Tranche 1 (which are the bulk of AEMO’s costs) and those expected to be incurred through Tranche 2 (May 2023) could start to be recovered.</li> <li>A cost recovery period of three years was proposed as the staggered implementation of the CDR reforms should be completed within this time.</li> <li>AGL supported AEMO’s draft proposal on these matters.</li> </ul>

<sup>2</sup> AEMO also provided responses in its [Draft Report and Determination](#) published on AEMO’s website to the two stakeholders (AGL and Origin Energy) who provided submissions to AEMO’s Consultation Paper.



## 4 Final structure of the CDR declared NEM project Participant fee

As identified in Table 2 above, delivery of the four tranches of the CDR Reforms is expected to be completed by the end of May 2024, and performance of the CDR functions by AEMO will occur via interactions with AEMO's retail systems and activities only; that is no wholesale or network service provider systems or activities are utilised by AEMO to deliver these functions.

AEMO's role as a secondary data holder is to provide metering data, standing data and distributed energy resource data. The peer-to-peer model and associated obligations require a level of monitoring, reporting and system performance that is not standard to AEMO's retail market operating model. Consequently, AEMO was required to develop new systems and processes to integrate and implement the CDR functions into the existing retail market systems, and AEMO will need maintain these systems and processes to ensure that they provide the CDR functionality on an on-going basis.

Specifically, the retail systems and activities required to be enhanced by AEMO to facilitate the CDR reforms included:

- Implementation of six new APIs in accordance with the CDR standards for data delivery (implemented as part of Tranche 1).
- Additional functionality into MSATS to provide a last consumer change date field which defines when an account holder starts or ends at a premise (implemented as part of Tranche 2<sup>3</sup>).

### 4.1 Stakeholder submissions

One submission was received from AGL which provided the following feedback:

- Was supportive of recovery from Retail Market Customers on a \$/NMI basis.
- Suggested recovery through the existing Electricity Retail Markets fee will be adequate if fees associated with the CDR Reforms are included as a separate line item for visibility.
- Was supportive of commencing recovery on 1 July 2023.

In response to this feedback, to provide greater transparency, AEMO's annual Budget and Fees reports<sup>4</sup> will separately identify the CDR costs to be recovered within the Electricity Retail Markets fee.

### 4.2 AEMO's final determination and rationale

In line with AEMO's draft proposal and assessment conducted for the second stage of consultation, AEMO's final determination is to use the existing Electricity Retail Markets fee with costs to be recovered from Market

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<sup>3</sup> AEMO notes there is currently a consultation underway to delay the effective date, however AEMO systems have already been updated to reflect the original date.

<sup>4</sup> AEMO's FY24 Budget and Fees Final Report, available at: [AEMO | Energy market fees and charges](#).



Customers with a retail licence levied on a \$/NMI basis (per week) commencing on 1 July 2023 for a period of three years.

This is proposed because:

- It better aligns with all fee principles and the NEO than the option to establish a new and separate CDR Reforms fee structure (as identified in the Draft Report and Determination).
- This fee structure only applies an additional fee to the Participants impacted by the CDR Reforms (either because they have a role in, or benefit from, the CDR Reforms) that is, retailers.
- Performance of the CDR functions by AEMO will occur via interactions with AEMO's retail systems and activities. The costs associated with these are all allocated to the Electricity Retail Markets fee category.
- The \$/NMI fee metric for the Electricity Retail Markets fee accurately reflects the manner in which retailers involved in the CDR Reforms can be charged.
- This fee structure maintains simplicity across AEMO's fee recovery process as it is consistent with an existing fee structure utilised by AEMO.
- The start date would allow recovery of costs to commence as soon as possible since Tranches 1 and 2 (effective November 2022 and May 2023 respectively) would be implemented by this time. Note, AEMO has already incurred the costs of making the system enhancements for the changes as outlined at the start of this section.
- The period for recovery aligns with the staggered implementation of the CDR Reforms (which are expected to be completed in May 2024), and the remainder of the current Participant fee period. The next general determination of Participant fees would then reconsider the most appropriate fee structure for the recovery of costs associated with the CDR reforms, if required.

# A1. Fee structure principles

Fee Structure Principle	Requirement	Application and examples
<b>National Electricity Objective (NEO)</b>	<p>In determining Participant fees, AEMO must have regard to the national electricity objective.</p> <p>The objective of the NEL is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to—</p> <p>(a) price, quality, safety, reliability and security of supply of electricity; and</p> <p>(b) the reliability, safety and security of the national electricity system</p>	<p>The Second Reading Speech to the National Electricity (South Australia) (New National Electricity Law) Amendment Bill 2005 makes it clear that the NEO is an economic concept and should be interpreted as such.</p> <p>The Speech gives an example that investment in and use of electricity services will be efficient when services are supplied in the long run at least cost, resources, including infrastructure, are used to deliver the greatest possible benefit and there is innovation and investment in response to changes in consumer needs and productive opportunities.</p> <p>The Speech goes on to state that the long-term interests of consumers of electricity requires the economic welfare of consumers, over the long term, to be maximised.</p> <p>If the NEM is efficient in an economic sense, the long-term economic interests of consumers in respect of price, quality, reliability, safety and security of electricity services will be maximised. Applying an objective of economic efficiency recognises that, in a general sense, the NEM should be competitive, that any person wishing to enter the market should not be treated more, or less, favourably than persons already participating, and that particular energy sources or technologies should not be treated more, or less, favourably than others.</p> <p>Since 2006, the NEO has been considered in a number of Australian Competition Tribunal determinations, which have followed a similar interpretation. See, for example, Application by ElectraNet Pty Ltd (No 3) [2008] ACompT [15]:</p> <p>“The national electricity objective provides the overarching economic objective for regulation under the Law: the promotion of efficient investment in the long term interests of consumers. Consumers will benefit in the long run if resources are used efficiently, i.e. resources are allocated to the delivery of goods and services in accordance with consumer preferences at least cost.”</p> <ul style="list-style-type: none"> <li>• The NEO is clearly a relevant consideration where AEMO has to exercise judgment or discretion in reaching its determination, for example, if there is a number of Participant fee structures each of which can satisfy the Fee Structure principles, or where the relevant provisions of the Rules are ambiguous.</li> </ul>
<b>Simplicity</b>	<p>The structure of Participant fees should be simple</p>	<p>As “simple” is not defined in the Rules, it must be given its ordinary meaning as understood in the context of clause 2.11 of the Rules.</p> <p>The New Shorter Oxford English Dictionary’s definition of “simple” (in this context) is: “not complicated or elaborate” and “plain, unadorned”. Whether a fee structure fits these definitions is largely a matter of judgement.</p> <p>There is a wide range of possible fee structures. There is no single identifiable point where “simple” becomes “complicated”.</p> <p>It is clear from this provision that a certain degree of complexity was envisaged in that the structure of Participant fees may involve several components and budgeted revenue consists of several elements. The structure of Participant fees need not demonstrate absolute simplicity.</p> <p>The simplest fee structures are unlikely to be consistent with the other criteria. However, it is possible to find fee structures that, while consistent with the other criteria, are relatively simple, in comparison to alternative structures.</p> <p>Further, AEMO considers that the use of the word “simple” in this context also involves a degree of transparency.</p> <p>AEMO considers that the simplicity principle means that the basis of the fee structure and its application to various Registered participants should be:</p>

Fee Structure Principle	Requirement	Application and examples
		<ul style="list-style-type: none"> <li>• straight-forward</li> <li>• easily understood by participants</li> <li>• readily applied by Registered participants and AEMO</li> <li>• foreseeable and forecastable in terms of impacts and costs.</li> </ul>
<b>Reflective of Involvement</b>	<p>The components of Participant fees charged to each Registered Participant should be reflective of the extent to which the budgeted revenue requirements for AEMO involve that Registered Participant</p>	<p>In determining whether the extent to which the budgeted revenue requirement relating to a particular output involves a class of Registered Participant, AEMO relies on the experience and expertise of its general managers and staff, and considers factors such as the degree to which the class of Registered Participant:</p> <p>(a) interacts with AEMO in relation to the output;  (b) uses the output;  (c) receives the output; and  (d) benefits from the output.</p> <p>AEMO also considers how the revenue requirements are given rise to, or caused by, that class of Registered Participant's presence in the NEM. AEMO must determine the structure of Participant fees "afresh".</p> <p>That is, it must freshly consider the application of the criteria in clause 2.11.1 of the Rules and the NEL to the facts and analysis available to it at this time.</p> <p>In doing so, however, AEMO will have regard to its previous determinations under clause 2.11.1 of the Rules, where appropriate.</p> <p>The principle of "reflective of extent of involvement" does not have a specialised meaning in economics. It is consistent with the economic notion of 'user pays' but as a matter of ordinary language, it indicates a degree of correspondence (between AEMO and its costs and participants) without connoting identity.</p> <p>However, this principle does not involve a precise degree of correspondence.</p> <p>Where fixed and common costs are involved, multiple registered participants may be involved with AEMO costs in relevantly similar ways. AEMO's analysis and experience shows that there are categories or classes of Registered Participants that share certain characteristics that mean that the way in which they interact with AEMO is likely to have the same or similar cost implications for AEMO.</p> <p>Where it is practical for AEMO to identify costs that are fixed or common in nature that can reasonably be allocated to a class or classes of Participants that share characteristics such that their involvement with AEMO's outputs is likely to have the same or similar cost implications, AEMO will seek to do so.</p>
<b>Non-discriminatory</b>	<p>Participant fees should not unreasonably discriminate against a category or categories of Registered Participants</p>	<p>In past Participant Fee determinations, AEMO (and its predecessor, NEMMCO) adopted the following definition of discriminate:</p> <p>"Discriminate means to treat people or categories of people differently or unequally. Discriminate also means to treat people, who are different in a material manner, in the same or identical fashion. Further, "discriminate against" has a legal meaning which is to accord "different treatment ... to persons or things by reference to considerations which are irrelevant to the object to be attained".</p> <p>This principle allows AEMO to discriminate against a category or categories of Registered participants where to do so would be reasonable.</p> <p>Where a degree of discrimination between categories of Registered Participants is necessary or appropriate to achieve consistency with the other principles in clause 2.11.1(b) of the Rules, or the NEL, the discrimination will not be "unreasonable".</p> <p>In considering a past fee determination, the Dispute Resolution Panel accepted that this principle is to be applied to the extent practicable and it is only unreasonable discrimination that offends.</p>

Fee Structure Principle	Requirement	Application and examples
<b>Comparability</b>	<p>In developing, reviewing and publishing, the structure of Participant fees, AEMO must consider other fee structures in existence which it thinks appropriate for comparison purposes.</p> <p>Note that this is not strictly a principle but is included for completeness in describing the matters for which AEMO must have regard.</p>	<p>Other relevant fee structures could include:</p> <ul style="list-style-type: none"> <li>• Other electricity market fee structures such as Western Australia or globally</li> <li>• Gas markets operated by AEMO</li> </ul>

## A2. Registered Participants (current)

Participant category	Description	Registered participant class
<b>Generators</b>	Any person who owns, controls or operates a generating system connected to a transmission or distribution network	<ul style="list-style-type: none"> <li>• Market Scheduled</li> <li>• Market Non-scheduled</li> <li>• Market Semi-scheduled</li> <li>• Non-market Scheduled</li> <li>• Non-market Non-scheduled</li> <li>• Non-market Semi-scheduled</li> </ul>
<b>Small Aggregated Generator</b>	An SGA can supply electricity aggregated from one or more small generating units, which are connected to a distribution or transmission network. A small generating unit is owned, controlled and/or operated by a person who AEMO has exempted from the requirement to register as a generator.	<ul style="list-style-type: none"> <li>• Market Small aggregated generator</li> </ul>
<b>Customers</b>	A customer is a registered participant that purchases electricity supplied through a transmission or distribution system to a connection point	<ul style="list-style-type: none"> <li>• Market customer</li> <li>• First-tier customer</li> <li>• Second-tier customer</li> </ul>
<b>Network Service Providers</b>	A person who owns, operates or controls a transmission or distribution system	<ul style="list-style-type: none"> <li>• Transmission network service provider</li> <li>• Distribution network service provider</li> <li>• Market network service provider</li> </ul>
<b>Special Participant</b>	<p>A delegate appointed by AEMO to carry out, on AEMO's behalf, some or all of AEMO's rights, functions and obligations under Chapter 4 of the Rules.</p> <p>A Distribution System Operator who is responsible, under the Rules or otherwise, for controlling or operating any portion of a distribution system (including being responsible for directing its operations during power system emergencies).</p>	<ul style="list-style-type: none"> <li>• System operator</li> <li>• Distribution system operator</li> </ul>
<b>Reallocator</b>	Anyone that wishes to participate in a reallocation transaction undertaken with the consent of two market participants and AEMO	<ul style="list-style-type: none"> <li>• Reallocator</li> </ul>
<b>Trader</b>	Anyone who wants to take part in a Settlements Residue Auction (SRA), and is not already registered as a customer or generator	<ul style="list-style-type: none"> <li>• Trader</li> </ul>
<b>Metering Coordinator</b>	Has the overall responsibility for coordination and provision of metering services at a connection point in the NEM	<ul style="list-style-type: none"> <li>• Metering coordinator</li> </ul>
<b>Market Ancillary Service Provider (MASP)</b>	Delivers market ancillary services in accordance with AEMO's market ancillary services specifications, by offering a customer's load, or an aggregation of loads into FCAS markets.	<ul style="list-style-type: none"> <li>• Market ancillary service provider</li> </ul>
<b>Demand Response Service Provider (DRSP)</b>	<p>A person who offers and provides load as either or both:</p> <p>(a) wholesale demand response in respect of a wholesale demand response unit; and</p> <p>(b) a market ancillary service in respect of ancillary service load,</p>	<ul style="list-style-type: none"> <li>• Demand response service provider</li> </ul>