CER Data Exchange Industry Co-Design

October 2024

Consultation Paper

Questions Submission

Alinta Energy

Full list of consultation questions

Question 1: Priority Use Cases - Do the identified priority use cases effectively address immediate data-sharing needs, and are there any additional use cases you would recommend prioritising?

Response: Alinta supports the priority use cases identified in the consultation paper. Alinta would consider Flexibility Service Requests and Visibility of CER Customer Choices as priority cases also, depending on the timing of delivery. These cases will be integral to a Retailer's day one product & sales strategy and short term success of CER.

Question 2: Strategic Use Cases - How do you view the long-term value of the strategic use cases and are there specific outcomes you would like these use cases to achieve in the future? Also do the strategic use cases sufficiently complement the priority use cases? Do you have any feedback on when these use cases should be implemented?

Response: Alinta supports the use cases identified, along with their alignment to the priority use cases. The timing of the delivery for these cases will be paramount, as without these cases from the commencement of Flexible Trading Arrangements, there will be significant impacts to early adopters. Flexibility Service Requests will need to ensure that there are the required changes to support settlements, to ensure that the customer benefits can be realised. Alinta would recommend that there is consultation on Network Limits Standardisation with all relevant industry participants to ensure that any impacts outside DNSP, Customer Agents & OEMs are recognised.

Question 3: Additional Use Cases - Are there additional or alternative use cases that would enhance the CER Data Exchange's outcomes?

Response: Alinta does not have any additional cases to include for consideration at this time.

Question 4: Changes to Use Cases - Would you suggest any changes to the use cases presented? Please outline your reasoning.

Response: Alinta does not have any changes to the suggested use cases beyond the timing / priority comments noted above.

Question 5: Prioritisation - Do you agree with industry preference that the CER Data Exchange should be designed with narrow capability initially but have the flexibility to expand in the future?

Response: Alinta supports this approach with consideration to the timing of priority cases in relation to FTA.

Question 6: Capability - Do the proposed data sharing capability discussed above support both current and future CER data sharing use cases? Please nominate what essential data sharing capability would be required?

Response: Alinta supports the capabilities listed and agree these support the cases, whilst being considerate to consumer concerns regarding data security. Alinta supports Information Security, Format Standardisation, Data Governance, Access Management and Platform Interoperability being mandatory for this program. Advanced

Data Validation should be considered a priority given its ability to avoid rework and delays, whilst Custom Data Formats and Batch/Real-Time Processing being important but requires cost implementation consideration.

Question 7: Additional Features - What additional features or capabilities could improve flexibility and scalability in the CER Data Exchange?

Response: Alinta recommends consideration to include capabilities that allow for identified data sharing to be receipted. It is important for success, particularly with time-sensitive data and customer transparency, that visibility exists to allow a participant or agent to be aware that data sent is received, acknowledged and confirmed/rejected as appropriate.

Question 8: Ownership Preferences - Which ownership model do you believe is best suited for the CER Data Exchange: Industry-led consortium, AEMO-led, or a New Independent Government Agency? Do you have feedback on the models in addition to those summarised in this paper? Are there other ownership models not listed in this paper that you would like us to consider?

Response: Alinta supports the AEMO-Led model. As participants are operating under and investing in future capabilities under this model (MITE), there are concerns that implementation of a differing model will be costly and not returning the investment through benefits. It is important to ensure that the current model of industry consultation & collaboration is maintained in this model.

Question 9: Oversight – prescription vs discretion - What level of oversight should apply to the CER Data Exchange? Should its operation be heavily prescribed, or should it be provided with operational discretion?

Response: Alinta supports a moderate level of prescription oversight, with regulation to provide transparency & cost-efficiency.

Question 10: Oversight body - Who should be responsible for overseeing the CER Data Exchange's operation? Are there other models of oversight that you would like considered? How important is regulatory independence in overseeing the CER Data Exchange, and would a new dedicated oversight agency or body better support transparent, impartial governance?

Response: Alinta supports oversight by bodies that currently perform this function for other industry processes i.e. AEMO and AER. These bodies, along with regulation for transparency and cost-efficiency, will lend to a data exchange that is consistent, clear and understood by all participants.

Question 11: Data Governance Preference - Which data governance model best aligns with industry's desire for trust, compliance, and flexibility?

Response: Alinta support the Existing Market Body to manage Data Governance.

Question 12: Adaptability - In your view, how should the data governance model support the integration of new use cases as CER technologies and industry demands evolve?

Response: Alinta supports the working group and consultation structure that exists today for change and enhancements. This allows for industry input, triage of changes requested and providing an opportunity for all

participants to have a say. Expedited change process also exists to facilitate for any new cases that are simpler to implement.

Question 13: Stakeholder Engagement - How frequently and in what format should the data governance framework engage stakeholders on changes to standards, compliance requirements, or new use cases?

Response: Alinta supports a working group of industry participants who meet bi-monthly to review and requested changes, enhancements or new use cases for consideration. The timing can be managed depending on the volume/demand of requests that are received, to ensure there are timely discussions on each topic.

Question 14: Data Quality - Whilst not included in the scope of the CER Data Exchange, do you have feedback or key considerations for ensuring data quality in a manner which compliments the Exchange?

Response: Alinta supports the notion of Advanced Data Validation to ensure data accuracy, to prevent incorrect data exchange, invalid data exchange and incomplete data exchange. These will lead to rework and delays. Also, Alinta supports data receipting as discussed above, to ensure parties have transparency over the data they are sharing and things like settlements and disputes can be managed efficiently.

Question 15: Alternative Preferences - Are there any data governance models not listed in this paper that you would like us to consider?

Response: Alinta does not have any suggested additions to the listed options.

Question 16: Phased Implementation Roadmap - Do you agree with the proposed phased approach for the CER Data Exchange implementation? What adjustments or considerations would you suggest to better align the phases with the needs of your organisation?

Response: Alinta supports the phased roadmap given the voluntary nature of this program, along with its dependencies on other programs such as Accelerated Smart Meter Deployment, other CER Roadmap initiatives and the not-yet-tested consumer appetite for CER participation. As the CER Roadmap has a voluntary element to it, there should be flexibility in the mandates for non-critical activities to be optional.

Question 17: Cost Recovery Model Preferences - What are your preferences regarding cost recovery for the CER Data Exchange? Would a direct, shared, or government-supported model be preferred, and why?

Response: Alinta supports a Government cost recovery model, given these initiatives under the roadmap have been requested by the Government for implementation.

Question 18: Regulatory and Policy Reforms - Which areas of policy or regulatory reform do you believe are most critical to support the CER Data Exchange? How should these reforms balance compliance with operational flexibility?

Response: Alinta supports all noted reforms in the consultation. These are critical to the success and opt-in by consumers to CER initiatives. Historical issues with data privacy and cybersecurity (incl. spam & fraud) are very prevalent to Australians. If there is lack of trust & inherent risk in the data exchange, consumers will not participate.
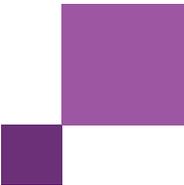
Question 19: Technical and Operational Challenges - What technical or operational challenges do you foresee in integrating your systems with the CER Data Exchange? Are there specific support mechanisms that would facilitate smoother adoption for your organisation?

Response: Alinta is cognisant of extensive changes across data standards and the cost impact this has to its business. For example, schema changes have historically been extremely costly to implement and Alinta would require detailed financial analysis on any such change, before supporting it. Given the data exchange has time-sensitive application, participating in certain elements would present an operational challenge, should any manual handling or customer interaction be required, given Alinta does not have a 24x7 operation. Any absence of transparency around data receipting / acknowledgement will also place a heavy burden on Alinta, particularly in relation to settlements and customer disputes. This could also create flow-on issues for EWO* bodies, should a customer escalate a dispute to their relevant ombudsman. Lastly, the overall cost impact on delivery, including any prescribed mandatory or regulated change, may have an impact on Alinta's ability to subscribe to CER. Overly inhibitive costs would then place Alinta in a less competitive advantage over other retailers.

Question 20: Impact on Stakeholders - What technical, regulatory, operational, or commercial impacts would you anticipate from implementing the CER Data Exchange in your organisation, and how could the roadmap or cost recovery model alleviate these impacts?

Response: Alinta foresees operational and commercial impacts as detailed within the response to question 19. By implementing a Government cost recovery model, depending on the levels of funding, this may materially change Alinta's ability to support & participate in the CER.