



CER Data Exchange Industry Co-Design GreenSync

Email sent to cerdataexchange@aemo.com.au.

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Introduction

GreenSync welcomes the opportunity to respond to the consultation on CER Data Exchange as published in Oct 2024.

In recent years, GreenSync has committed its resources and intellectual property to supporting adoption and integration of CER leading to interoperable CER data exchange for effective and efficient management and coordination of CER. We believe that CER asset registration is an important first step in both enhancing asset visibility and unlocking CER data exchange.

GreenSync has been deeply involved as well in similar considerations and projects in the UK, where we continue to work with the Government, the Regulator, and the industry in creation of digital infrastructure to facilitate CER registration, CER data exchange and enablement for CERs to participate in flexibility markets through a scalable and trusted infrastructure and framework.

GreenSync welcomes the opportunity to present AEMO with detailed findings and status of implementation so far, if of interest.

Please reach out to Ashley.johnston@greensync.com.au in the first instance should you wish to discuss our response.

With kind regards,

Ashley Johnston

CTO GreenSync

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?

Implementations should be targeted on satisfying priority use case(s) while providing flexibility to add new use cases in the future.

Based on our experiences, even though listed priority use cases 1 (Sharing Network Limits) and 2 (Supporting Local Network Services) are important, priority use case 3 (Consistent CER Standing Data) is foundational for CER Data Exchange.

GreenSync has demonstrated in the DESNZ AAR/CAR programme¹ how deX can be efficiently utilised to achieve and provide CER registrations through trusted access to expanded, accurate and dynamically updated CER standing data. Consistent verified data is important for planning activities and operational decisions by DNSPs, retailers, and other industry participants but also to better customer experiences, at point of CER installation (registration) and through the lifetime of the 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?

While we see long-term value of the proposed strategic use cases, we see in particular high importance in Flexibility Service Requests, Visibility of CER Customer Choices, and Streamlined CER Portfolio Data Access. These when combined with Consistent CER Standing Data start to unlock the full potential of CER, effectively embedding also small-scale large volume CER in flexibility mechanisms.

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

When it comes to CER Data Exchange, GreenSync’s experience is that, although it should follow and apply a standards based approach, the design should not be limited to a single standard for the data exchange; that being either data collection, controls, or individual or aggregated data point sharing. The CER Data Exchange shall encompass as much as possible i.e. brownfield and greenfield CER installations, with as little restrictions as possible. If this is achieved, then through innovation new additional use cases will be developed; possibly use cases that we cannot even foresee today.

¹ <https://www.gov.uk/government/publications/automatic-asset-registration-aar-programme>

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

GreenSync has no suggested changes at this point in time.

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?

Yes.

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?

GreenSync is the opinion that the CER Data Exchange should provide secure, reliable, and scalable data services utilising modern and cost-effective techniques for information security, format standardisation, access controls and processing.

The operational structure should provide the necessary policies and strong data governance ensuring that data is shared in a transparent, secure, and compliant manner.

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

One of the interesting challenges GreenSync has been engaging on with Ofgem and the industry in the UK is the challenge around GDPR and effective consent controls. As in many other jurisdictions around the world, compliance to GDPR (or other data protection laws) is left to be implemented by any and all solutions, even if they require basically consent for the same data. This, in the eyes of a future digital energy system, is simply not efficient as well as introduces unnecessary obstacles for CER data exchange.

There are fundamentally two solutions to this problem – imposing an opt-out to consumers which reduces the hurdle but does not resolve the issue, or building, as a part of CER Data Exchange, a digital solution that will enable consumers to share their energy data with trusted third parties to receive tailored services to manage their CERs and data. This should encompass the granting of consent, and the more complex aspects of managing, reviewing, and revoking consent uniformly across all of the CER Data Exchange applications.

We believe that a clear, system-wide consent processes that puts control of data into the hands of consumers, will significantly add to trust and reduce barriers to participate in the envisioned maximising of flexibility markets and allowing the system to balance the intermittency of renewable generation.

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?

GreenSync does not have a view on the best 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?

We would expect some degree of prescriptiveness. Some prescription setting out key aspects would be helpful to unify and adopt the service across NEM faster than perhaps with a high discretion, principle-based approach.

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?

Greensync does not have a particular view on who should be responsible for oversight, other than existing regulatory and market bodies could be initially well situated to provide effective oversight.

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

Greensync does not have a particular view on this other than existing market and regulatory bodies could be well situated to initially provide effective 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?

Greensync does not have a particular view on this, other than ensuring ongoing industry input and consultation.

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?

We could well envisage for the data governance framework to include an industry working group, which would meet regularly, provide proposal on changes to standards, compliance

requirements, or new use cases, to be, once accepted, converted into contributions, published under data governance framework, at least annually.

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?

As high data quality, although not always achievable, may be crucial for a number of operations, we are of the opinion that the data provided by the CER Data Exchange shall follow a quality framework i.e. every data to be marked in accordance with the agreed framework. This would allow for the CER data user to make decisions informed also based on the quality of data. For example, what data has been verified and when, what data is at best estimated due to temporary or permanent disability to communicate with CER and validate the date, etc.

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

Not at this moment.

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?

We agree that focus should be on the identified priority use case(s).

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?

Greensync does not have a firm view at this moment.

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?

As mentioned in Question 7, given the importance of customer trust, reforming existing data privacy and security regulations is in our view important.

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?

Greensync doesn't have any comments at this stage. The solution design would inform this

further.

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?

Greensync has not analysed the technical, regulatory, operational, or commercial impacts to date.