Feedback Register for CER Data Exchange - Consultation Paper

Deliverable Title:	CER Data Exchange - Consultation Paper
Author:	NEM Reform
Input By Date:	18th Nov
Agree By Date:	20th Nov
Recommend and Decide by Date:	21st Nov

#	Question	Comment	Reviewer	Review Date	Priority	Response	Response Date
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 Priority Use Cases 1.Sharing Network Limits, 4.Supporting Local Network Service, 9.Consistent CER standine data					We support the priority use cases here. These use cases will be the first CER Data Exchange use cases required to commercially operationalise the 'CER for FTA' and 'IPRR' reforms	Nov 21 2024
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 case sufficiently complement the priority use cases? Do you have any feedback on when these use cases should be implemented?					There are two strategic use cases that should immediately follow the high Priority use cases in sequencing. 1. Grid Data Collaboration 2. Streamlined CER Portfolio Data Access	Nov 21 2024
3	Additional Use Cases - Are there additional or alternative use cases that would enhance the CER Data Exchange's outcomes?						Nov 21 2024
4	Changes to Use Cases - Would you suggest any changes to the use cases presented? Please outline your reasoning						
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?					We agree with the prioritisation of use cases in Figure 17 of the CER Data Consultation Paper. We support a quick win and test 'concept'. A lot of non-functional requirements will emerge as usage grows and the capability to assert and understand the funding the management of these will need to be articulated	Nov 21 2024
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?						Nov 21 2024
7	Additional Features - What additional features or capabilities could improve flexibility and scalability in the CER Data Exchange?					A distinction should be made between event based data exchange scenarios and data set exchanges. - For the event based exchanges a GraphQL approach should be considered. - For the data-set exchanges a zero copy model employing shapshot cloning should be considered. Here pointers to a data-set would be sent as events (rather then the data-set itself) and then the data would be accessed by the participant using the pointer.	Nov 21 2024
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?					On balance we think the Operating Body should be AEMO led. If it could be established that a New Independent Government Agency could meet the required timelines and cost effectiveness of an AEMO led Operator then this should be considered	Nov 21 2024
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?					Oversight should be provided with operational discretion	Nov 21 2024
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?					We propose that AER is the governance body to separate Governance from Ownership and to place the oversight responsibility in the hands of the market regulator	Nov 21 2024
11	Data Governance Preference - Which data governance model best aligns with industry's desire for trust, compliance, and flexibility?					Data Governance should be provided by the Operating body. Preferably Model C (Existing Market Body or Regulator) or then model D (New CER Data Governance Authority)	Nov 21 2024
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?					There should be a time boxed, short, prescribed appromment cycle properly resourced with a permanent team within the Operating Body	Nov 21 2024
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?					There should be a standing forum that meets monthly	Nov 21 2024
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?					The technical maturity of participants will present significant data quality challenges. A periodic check across participants across industry with some mechanism to curtail and correct the operations of participants who have detrimental market effects through poor data quality. - Data sovereignty will be a hard to manage, particularly where aggregation of data is required for the purposes of synthesising responses back into the Data Exchange. - Repetitions of these aggregations will make duplication of data hard to avoid. - The quality and reliability of CER (VSR) forecast data will have significant implications for consumer power quality and overall grid stability.	Nov 21 2024
15	Alternative Preferences - Are there any data governance models not listed in this paper that you would like us to consider?						Nov 21 2024
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?					Alignment with other NEM Reform Initiatives, similar to how PQ data , part of Metering Services Review, is being assessed for alignment with MITE. Potential alignment options with pathway 3 Integration of DER and Flexible Demand - Unlocking CER benefits, IPRR, DOE, DER Datahub and Registry, Distribution Local Network Services, DER Operational Tools	Nov 21 2024
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?					Government-funded model for the first 5 years of operation including supporting DNSP costs to ensure level playing field and stabilisation of operations. AEMC can take this time window to design the best funding model	Nov 21 2024
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?					The CER Data Exchange will be critical in providing operational mechanisms to gain benefit from the 'CER for Flexible Trading' (FTA) and the 'Integrating Price Responsive Resources' (IPRR). Effectively this Data exchange will be the mechanism by which VSRPs can manage data flows for two way energy and value data for utilisation of Secondary Settlement Points. There needs to be firm regulatory support with an integrated reform timeline, backed by appropriate rule changes for DNSP's to provide certainty to the mechanisms available to conform with, and support the development of the CER Data Exchange	Nov 21 2024
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? Peer-to-peer data sharing is new.					The technical maturity of participants will present significant data quality challenges. Data sovereignty will be a hard to manage, particularly where aggregation of data is required for the purposes of synthesising responses back into the Data Exchange. Repetitions of these aggregations will make duplication of data hard to avoid. The quality and reliability of CER (VSR) forecast data will have significant implications for consumer power quality and overall grid stability.	Nov 21 2024
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?					Moving away from the known hub and spoke architecture used for traditional Market System will be quite challenging with CER data exchange Data peer to peer architecture. We may have to exchange data with up to 100 participants. Standardization and interoperability will be key. How are we all going to align and by what mechanism will we be able to recover the costs of our participation in the CER Data Exchange	Nov 21 2024
	NEW - Reconciliation reporting requirements						