

Foundational & Strategic Initiatives Business Case



- Identity and Access Management (IDAM)
- Industry Data Exchange (IDX)
- Portal Consolidation (PC)

July 2024



Table of contents

#	Content
	Introduction
1	Executive Summary
2	Purpose
3	Options Considered
4	Financial Assessment
5	Options Assessment
6	Recommendation
7	Risk Assessment
8	Appendix

Version Release History

Version	Issue Date	Author	Details
0.1	18/12/2023	Reform Delivery (NEM Reform)	Draft for feedback
0.2	26/02/2024	Reform Delivery (NEM Reform)	Second draft with feedback incorporated, to be taken to Exec Forum and through internal AEMO governance processes.
1.0	11/07/2024	Reform Delivery (NEM Reform)	Final version, endorsed by AEMO and supported by industry

Change Tracker

Slide Number	Change description
4, 5	Updated to reflect final nature of this document
(Deleted slides)	Deleted “Next Steps” section
Minor changes throughout	Updated initiative names (e.g. Metering Services Review) and changed some wording to past tense reflecting that the business case engagement process is now complete.

Introduction

AEMO would like to thank industry for their participation throughout 2023 and 2024 via the Foundational and Strategic Initiatives Focus Group (FaSI FG); this participation, collaborative engagement and development of the target state, transition strategy and business case inputs including costs and benefits has enabled the development of this package.

The development and assessment of options in the draft business case package would not have been possible without this collaboration.

We also thank industry for providing formal submissions and support at Executive Forum on the draft business case package. The detailed feedback for the draft business case package enabled AEMO to improve the general quality of this document, address some ambiguity in language and presentation, and clarify very relevant queries.

The draft business case package has been taken through internal AEMO governance processes (as per the *NEM Reform Implementation Roadmap Governance - Statement of approach* document) and has now been approved. There were no changes to the recommendations that arose through that process.

The release of this final version closes the business case engagement process. The projects now form part of AEMO's NEM Reform Program suite of initiatives and project engagement with industry will follow our standard approach.

Overview

The energy sector is at a pivotal juncture: Given the inflection point we are at as an industry, AEMO has taken the time to assess whether strategic step-change investments in foundational services is preferred over continuing to invest in tactical legacy software for the provision of Identity and Access (IDAM), Industry Data Exchange (IDX), and Portal Consolidation (PC) capability. This working draft business case aims to assess the benefits and costs of those different approaches and ensure that we are able to provide a secure foundation for the renewable energy market transition.

A key question under consideration is whether to allocate resources strategically to provide a secure and fit-for-purpose technology foundation to deliver better consumer outcomes, or if the current reactive (as needs) approach to uplifting AEMO and participant systems to align capabilities with reform dependencies remains viable.

AEMO has identified IDAM, IDX and PC as a subset of foundational initiatives that will serve as prerequisites to the NEM Reform Implementation Program. The existing landscape of IDAM, IDX and PC requires industry participants to interact through different access points, causing an inconsistent, fragmented and duplicated user experience when accessing AEMO's systems.

Due to the mandatory cybersecurity uplifts (such as SOCI Act requirements) and advanced security capabilities such as identity federation, context-based authentication, the "do nothing" option is too risky, for both AEMO and industry, to be recommended. As a result, AEMO has developed the potential options on the basis that the initiatives will address identified industry pain points. IDAM, IDX and PC initiatives aim to create a fit for purpose, resilient and secure framework for existing market business services and provides the agility to support services for new NEM Reform Initiatives as well as an extensible framework for other energy markets. The initiatives will also provide a platform for the development of new market services, strengthening the market's ability to transition to a renewable generation future.

The implementation timeline was developed in collaboration with industry; longer timeframes are provided for the foundational period in order to reduce the workload for industry for NEM Reform program initiatives and provide the opportunity to enable changes to be implemented through lifecycle upgrades. The proposed timeframes will be confirmed in consultation with industry throughout the consultation period.

This business case includes a NEM industry-wide cost benefit analysis: those costs and benefits (including a methodology for extrapolation) were developed together with industry.

Recommendation Summary

Compelling drivers exist to develop new foundational capability across IDAM, IDX and PC areas. Given short term reform roadmap congestion & need for fiscal prudence, *AEMO recommends a phased investment approach for IDX* to address critical security needs, support near-term NEM reforms, provide flexibility for the future & address priority industry pain points.

RECOMMENDATION

RATIONALE



Identity and Access Management

PROCEED with a Strategic target state, AEMO investment of **\$21M¹** over 2 years

- Address key security vulnerabilities and reduce attack surface area – identity management is the most impactful “weak link” in the cyber security chain
- Manage expected increase in identities for management: DERs, small generators
- AEMO TCO cost differential of **\$8M** & total Industry costs of **\$38M** are smaller than the potential cost and customer impact of security breaches



Industry Data Exchange

PROCEED with a Strategic target state Foundation phase, AEMO investment of **\$20M** over 2 years

- As the grid becomes digitised, data exchanged is increasing in volume, frequency and requires lower latency
- IDX Foundation phase represents an efficient and unified implementation of data exchange capabilities across multiple reforms requiring it (AEMO costs are **\$20M** compared to **\$29M** if done initiative by initiative, and participants also see a cost efficiency)
- Migrating legacy services is difficult to assess at this stage given the cost uncertainty and value uncertainty. Deferring the decision point on migrating legacy services – IDX Transition phase – allows for more certainty on cost and value estimates and more information to guide optimising the transition approach.



Portal Consolidation

PROCEED with a strategic target state, AEMO investment of **\$6M** over 2 years

- Portal Consolidation Strategic target state delivers benefits to address identified industry pain points for a TCO cost differential of **\$6M** for AEMO and **\$13M** for industry
- Reduces AEMO’s attack surface area in the most common ‘entry point’ for bad actors

1. All financial figures presented on this slide have a +/- of 40%

Vision and Benefits of IDAM, IDX and PC initiatives

Vision

Creating **extensible, resilient and secure** enabling technology frameworks (identity management, data exchange and web access) that underpin AEMO's services to and between NEM market participants, extensible to WEM and gas.

AEMO Overall Benefits

- ✓ Supportability of the technology ongoing (transition away from a proliferation of custom solutions)
- ✓ Reduction in security vulnerability risk through move to 'secure by design' technology
- ✓ Ability to implement reform initiatives faster through scaling resourcing and more modular solutions
- ✓ Key plank of plans to meet SOCI Compliance – both minimum and evolving requirements

Industry Overall Benefits

- ✓ Reduced operational costs through self-service
- ✓ Lowered barriers to entry for participants, including in emerging markets
- ✓ Lowered localisation costs of global industry technology solutions, e.g. CIS platforms
- ✓ Improved security posture and assists industry in meeting their SOCI obligations

IDENTITY & ACCESS MANAGEMENT



A unified mechanism to authenticate and authorise external identity and entitlements when accessing AEMO services, consolidating and improving overall cyber security controls.

Specific Benefits

- ✓ Provides support for organisational hierarchy and federation
- ✓ Enhanced security and alignment with industry obligations and best practice in cyber security controls (e.g. multifactor authentication)
- ✓ Enhanced self-service auditing and reporting capabilities to support industry's governance and compliance and reduce operational costs

INDUSTRY DATA EXCHANGE



A unified data exchange mechanism to support the secure and efficient exchange of data between energy stakeholders for new services required by NEM Reforms, existing legacy services and provide a framework extensible to other energy markets.

Specific Benefits

- ✓ Efficiently consolidates the development of data exchange protocols for new business services – avoiding protocol 'bloat', minimising siloed development & improving speed to market for new reforms
- ✓ Aligns with changing participant systems and cyber security obligations
- ✓ Improves transaction timeliness & reduces incidence of stop files
- ✓ Enables the scalable extension of existing business services [IDX Transition]
- ✓ Enable compartmentalisation of schema changes, thereby reducing regression testing costs of twice-yearly market changes [IDX Transition]

PORTAL CONSOLIDATION



A new web and mobile user portal to provide a unified stakeholder experience. The portals framework is an enabling platform that supports energy market participants and other partners to consume AEMO browser services in a secure manner.

Specific Benefits

- ✓ Standardised experience to consume AEMO browser services
- ✓ Enhance self-service capabilities for market participants
- ✓ Integration with the enterprise identity management and user authentication solution
- ✓ Enables improved user experience by establishing standards for navigation, look and feel and help menus

1. Executive Summary

Background Context

AEMO was established in 2009 and has since expanded its mandate and technology landscape to cover the NEM, WEM, and gas markets, leading to the use of diverse solutions by industry participants and AEMO in a fragmented technology environment. This has led to increased systems complexity and inefficiencies, and higher AEMO and Industry costs, exacerbated by a strong tendency of back-compatibility as new services are rolled out. As the energy transition rollout continues at pace, the market systems required a review to assess the ability to provide a foundation for future requirements.

Given the inflection point we are at as an industry, we believe that now is the time to assess whether strategic step-change investments in these foundational services is preferred over continuing to invest in tactical legacy software. This business case aims to assess the benefits and costs of those different approaches.

Key Drivers for Change



Energy Industry Transformation

Energy Transition imposes the **most significant set of reforms** on the Australian energy industry since the creation of the NEM.

We are at a pivotal juncture: whether to allocate these resources **strategically** to provide a secure and fit-for-purpose technology foundation to deliver better consumer outcomes, or to take a **tactical, reactive and fragmented** approach, compounding complexity in AEMO and participant IT landscapes, increasing implementation and operational expenses and reducing agility to respond to change.



Security Concerns

The interconnectivity of the energy sector and digitisation of the grid is **increasing the surface area** of potential vulnerabilities that can be exploited, and the impact if security is breached.

Community expectations and **government directives and legislation** impose additional accountabilities and responsibilities for AEMO and industry to safeguard the critical services we collectively operate and protect our customers from impact.

The presence of multiple routes for managing identities and access, coupled with non-standard data exchange protocols and patterns, existing alongside diverse entry points to AEMO services collectively represent an **unacceptably vulnerable landscape**.



Industry Pain Points

The existing landscape of IDAM, IDX and PC requires industry participants to interact through different access points, using different protocols, formats and standards, and causing an inconsistent, fragmented and duplicated user experience when accessing AEMO's systems.

This leads to higher ongoing operational costs for AEMO in activities needed to support the performance of its functions. This has a cascading effect of administrative burden for the participants.

For example: current IDAM current services are disparate, requiring users to retain multiple sets of credentials, and AEMO's existing data exchange mechanisms use inconsistent standards, protocols and formats.

Business Case Approach

AEMO identified IDAM, IDX and Portal Consolidation as foundational initiatives that serve as prerequisites to the NEM Reform Implementation Program. These involve uplifting AEMO & participant systems to align capabilities with reform dependencies. The key outcome from these initiatives will be creating a fit for purpose, resilient and secure framework for existing market business services and provides the agility to support services for new NEM Reform Initiatives as well as an extensible framework for other energy markets.

Approach

AEMO collaborated with the industry participants ([FaSI Focus Group](#)) to develop a business case to assess the feasibility of implementing these three initiatives: IDAM, IDX and Portal Consolidation.

This was completed over more than 6 months and more than 10 consultation workshops of on average 4 hours each:

1. Identification of current industry pain points relating to these domains
2. Development of conceptual target state solutions that would materially address those pain points, and refinement based on feedback
3. Transition Strategy covering guiding principles, sequencing and bundling of business services and prioritisation of tranches, including a flexible sunset period
4. Initial Implementation Cost Estimates and a methodology for assessing the business case
5. (This document) a business case



Identified Foundational Capability Gaps

The absence of foundational capability to support new reforms was identified across three areas.



Identity and Access Management

Problem Statement:

AEMO's Identity and Access Management (IDAM) services are disparate, requiring users to retain multiple sets of credentials in order to access AEMO business services. The legacy IDAM services do not implement best practices in cyber security controls (e.g. multifactor authentication) and are insufficient to meet new industry obligations introduced under the SOCI Act.



What are we trying to achieve

A unified mechanism to authenticate and authorise external identity when accessing AEMO services, consolidating and improving overall cyber security controls.



Industry Data Exchange

Problem Statement:

AEMO's existing data exchange systems have been variously acquired over the last 10-15 years, and use inconsistent standards, protocols and formats. AEMO's markets are also undergoing significant transformation, resulting in new data exchange needs. AEMO introducing new data exchange patterns without a unified target state and roadmap is inhibiting participants from modernising their systems and quantifying the benefits of their investments.



What are we trying to achieve

A unified data exchange mechanism to support the secure and efficient exchange of data between energy stakeholders for new services required by NEM Reforms, existing legacy services and provide a framework extensible to other energy markets.



Portal Consolidation

Problem Statement

AEMO browser services are exposed over a disparate range of end points and require multiple sets of credentials to consume these services. This results in a suboptimal user experience for energy stakeholders. The requirement to access browser services via private networks creates technical barriers to consuming these services.



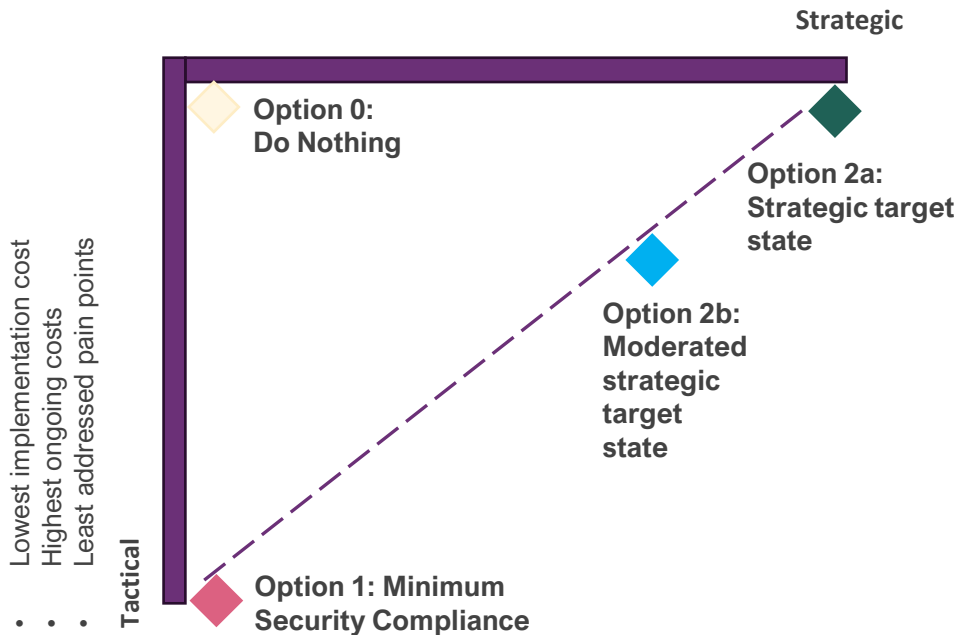
What are we trying to achieve

The aim of the Portal Consolidation project is to enable a unified stakeholder experience that hosts web applications. The portals framework is an enabling platform that supports energy market participants and other partners to consume AEMO browser services in a secure manner.

Options Development

We identified two main options which “bookend” the many possible options available: A tactical “minimum compliance” Option 1 and the target state solution Option 2a. Other available hybrid options could be finessed during Delivery.

- Highest implementation cost
- Lowest ongoing costs
- Addresses pain points



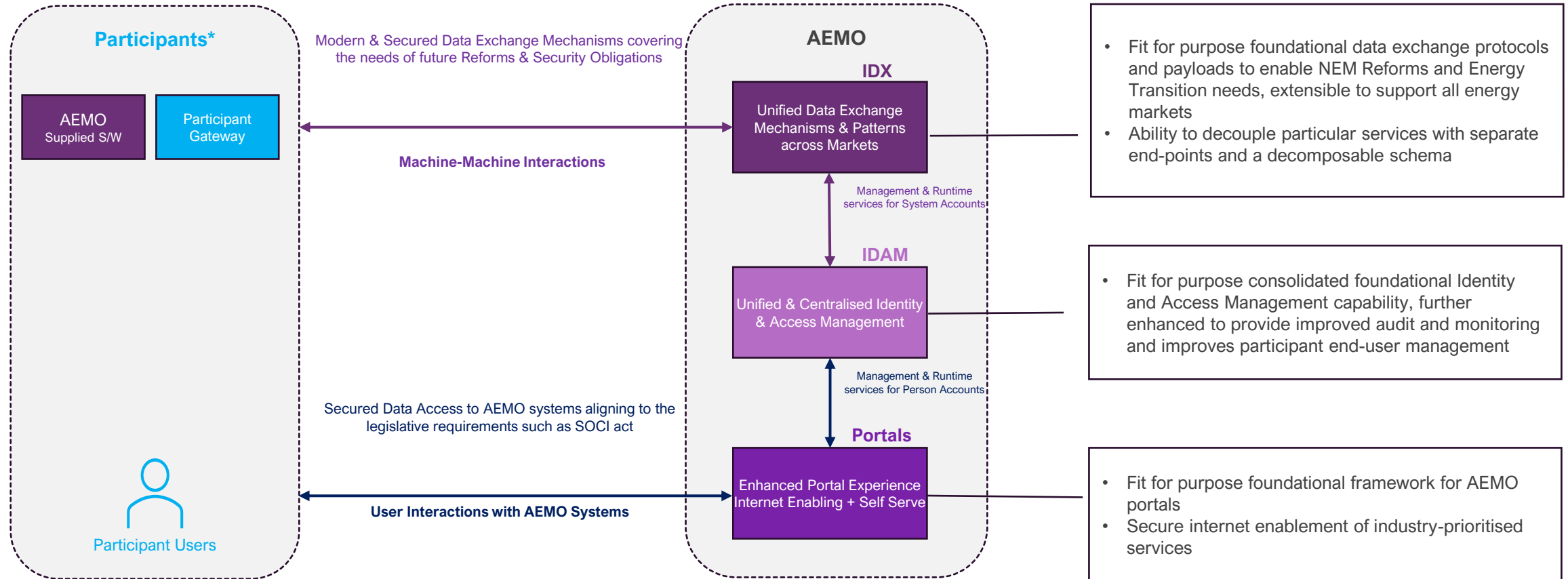
Option	Description
Option 0 – Do Nothing	We conducted a risk assessment against current system landscape & found this option unacceptable – our SOCI compliance obligations would not be met & cyber risks are unacceptably high . This option has therefore been discounted from further analysis.
Option 1 – Minimum Security Compliance	This option addresses the most egregious security risks from Option 0 and puts in controls to address remaining risks.
Option 2b – Strategic target state moderated by retaining legacy payloads	This option arose during industry consultation as a potential hybrid option that dilutes the full benefits of target state in order to reduce estimated costs. It does not address all industry pain points.
Option 2a – Strategic target state	This is the strategic target future state, as collaboratively designed with industry to address identified industry pain points, enable deliverability of future reforms and materially address security risks.

While there are many hybrid options that could be considered reflecting different scope parameters, to simplify the analysis of the business case we considered options representing the minimum and maximum scope.

As the target state sets a ‘high’ bar in terms of cost, it is anticipated there is only upside should opportunities to rationalise or change scope be identified during Delivery, especially during the Design and Consultation phases.

Strategic Target State (Option 2)

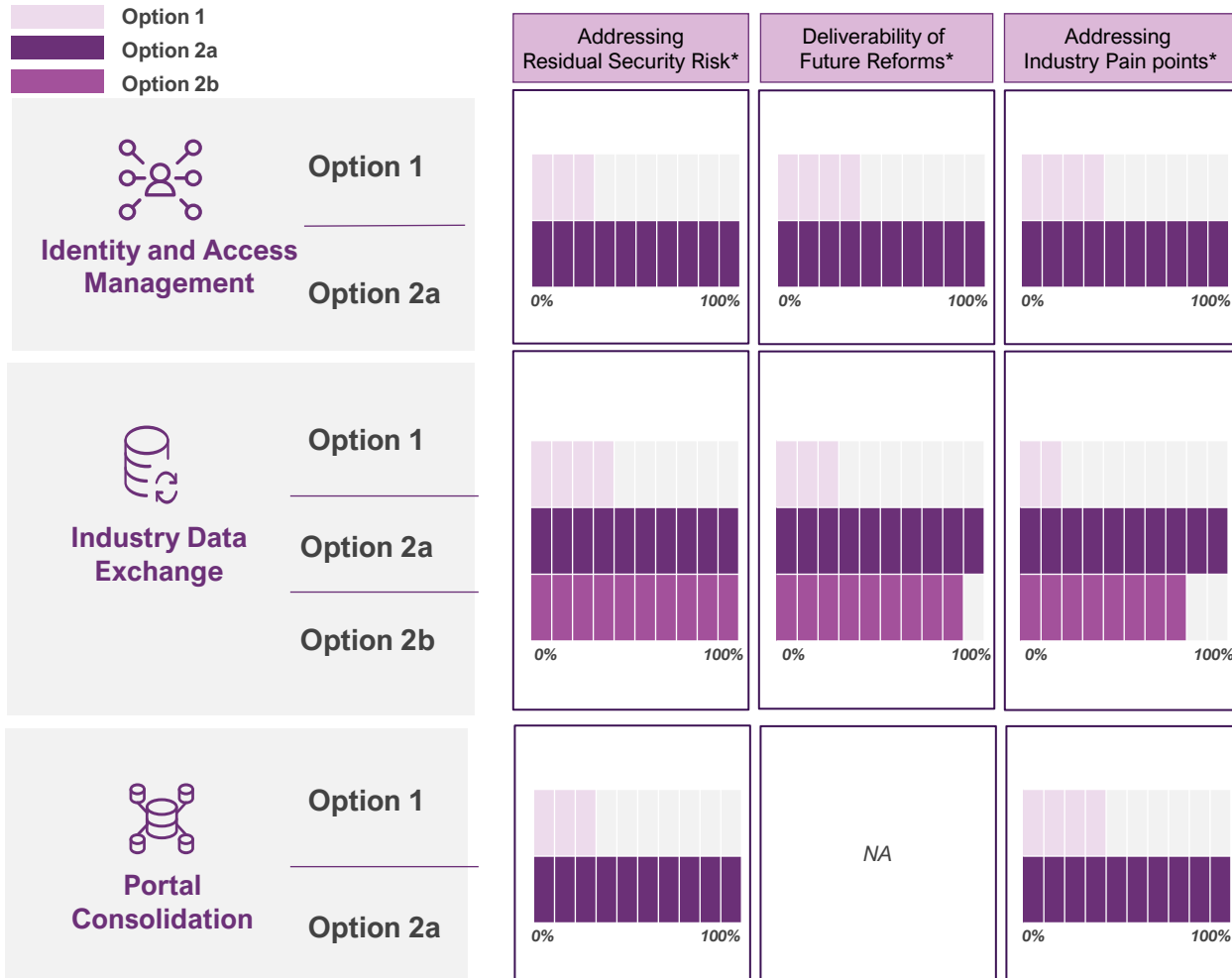
Target state was developed in collaboration with industry, and provides a strategic, “secure by design” foundation for identity management, data exchange and portal access services to AEMO and the industry. It delivers a ‘step-change’ capability uplift and addresses current industry pain points .



* Includes Participants, Service Providers, 3rd parties, non-Participants etc

Assessing Options against key drivers

AEMO's assessment is that Option 2 is superior to Option 1 in (i) addressing security requirements, (ii) enabling future reforms to be delivered and (iii) addressing identified industry pain points.



Key Notes

Addressing Residual Security Risk

- Option 1 addresses security pain points from a minimum compliance perspective. It still retains a large surface area of multiple identity systems, multiple data exchange protocols and technologies, and multiple entry points to AEMO's web presence.
- Option 2 takes a strategic, 'secure by design' view to identity management, data exchange and portal access needs. It *unifies* platforms and protocols, thereby reducing our attack surface area

Deliverability of Future reforms

- Option 1 does not provide a holistic platform to support upcoming NEM2025 Reforms with respect to identity management and data exchange. As immediate examples, DER Data Hub and the requirement for Power Quality data from the Metering Services Review would need to be developed independently under Option 1.
- Option 2 for IDAM and IDX is explicitly designed to provide this leverageable foundational capability

Addressing Industry Pain Points

- Option 2 was scoped in collaboration with industry to fully address identified industry pain points.
- Option 1 addresses a very limited number of pain points

*Percentages are derived from individual option ratings in relation to the overall score – please refer to 'option assessment' section for more details

Residual security risk – Business Case context

Community expectations and **government directives and legislation** impose additional accountabilities and responsibilities for AEMO and industry to safeguard the critical services we collectively operate and protect our customers from impact.

The IDAM, IDX and PC initiatives under this business case address establishing target / end state capability for a subset of these services and are expected to be taken as an input into the overall compliance programs that AEMO and industry individually orchestrate.

Overall AEMO and industry cyber programs

↑ *Inputs into*

IDAM, IDX and PC:

By August 2024 (outside this Business Case)

Post August 2024 (within this Business Case)

Immediate term – High risk vulnerabilities

Examples may include:

- Hardening of APIs that are internet enabled
- Enhance visibility and API cyber incident management process
- Where appropriate, enhanced controls and monitoring

Outside the scope of this business case – refer to AEMO cyber program

Immediate term – second tier vulnerabilities

- Action plan to address second tier vulnerabilities (this Business Case forms such an action plan)

Takes inputs from this business case

Medium term – continuous risk management

While end state capability is being delivered and / or transition is in progress new requirements may identify a need to assess:

- Additional process controls
- Additional transitional states applicable to participants who defer transition late into the sunset timelines

Managed through the Transition Roadmap Governance process proposed under this business case

End state

- Delivery of end state capability providing security uplift
- Transition of services across to the new capability (may be progressive – subject to transition approach)

The focus of this business case

Addressing residual security risks

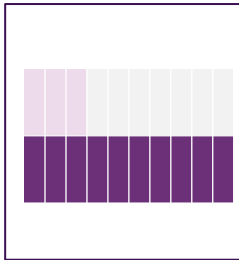
- Option 1
- Option 2a
- Option 2b

Addressing Residual Security Risk*

Identity and Access Management

Option 1

Option 2a

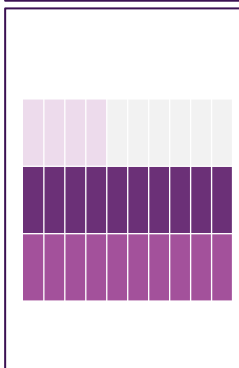


Industry Data Exchange

Option 1

Option 2a

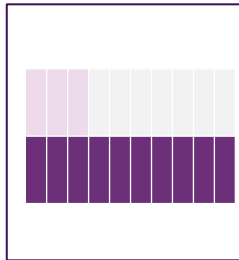
Option 2b



Portal Consolidation

Option 1

Option 2a



Option 1 (SOCl compliance driven)

Available from Q2 2025

IDAM delivery

- Implement Multi Factor Authentication (MFA) to enable two step authentication for the browser services
- Enhance self-certification management process

IDX Foundation & new services

- Migrate from FTP to SFTP
- Move APIs to OAuth authentication and authorisation pattern
- Deliver secure solution for large file transfer

Subject to DP2 - Available from Q4 26 (Wholesale) Q3 27 (Retail)

IDX Transition (legacy services)

- Progressive transition from insecure legacy protocols to secure IDX foundational protocols
- Further reduction in attack surface area

Available from Q2 2025

PC delivery

- Enhance existing browser services to integrate with IDAM to address legislative requirements
- Retire standalone MSATS browser URL, now available in Markets Portal

Option 2 (Strategically Driven)

Available from Q2 2025

IDAM delivery

- Secure Identity and Authorisation target state enabled
- Rationalisation of identity stores and solutions
- Improved audit and monitoring

IDX Foundation & new services

- New services established on target state, secure framework
- Containment of growth of attack surface area

Subject to DP2 - Available from Q4 26 (Wholesale) Q3 27 (Retail)

IDX Transition (legacy services)

- Progressive transition from insecure legacy protocols to secure IDX foundational protocols
- Further reduction in attack surface area

Available from Q2 2025

PC delivery

- Secure Portal framework provided
- Internet enabled services leverage secure framework

Both Option 1 and Option 2 address AEMO and industry's end state SOCl security compliance obligations (within the context of the scope of this business case).

Capability will be available for industry in equivalent timeframes under both options, noting extended sunset timelines requested by industry for IDX Transition subject to DP2.

Option 2 provides further reductions in residual security risk beyond bare minimum compliance through the establishment of secure by design consolidated capability and resulting reduced attack surface area.

Addressing Industry Pain Points

Only Option 2 target state solution addresses all the industry pain points identified through workshops. Option 1 partially addresses security-related pain points but otherwise does not provide benefits to industry.



Identity and access management

Industry Key Pain Points Addressed by Both Options 1 & 2

Need for Multi-factor authentication to enhance security



Industry Data Exchange

Partially

Inconsistent authentication and decentralised authorisation



Portal Consolidation

Industry Key Pain Points Addressed by Option 2 Only

Multiple credentials required to access different AEMO systems	Lack of reporting capabilities to conduct periodic assessments	Lack of Federation
Inadequate self-service capabilities e.g.: Password reset	Lack of pre-defined entity catalogue and role catalogue	Inability to automate user offboarding
Multiple patterns for the same regulated transactions	Lack of consistent standards across Systems / Fuels / Jurisdictions	Management of multiple patterns, most of which have had zero uptake
Mandatory aseXML schema updates are costly	Need for improved speed to market of business and regulatory changes	No option to configure message delivery orders
<i>Fully</i> Inconsistent authentication and decentralised authorisation	Suboptimal reliability of service for automated market interfaces	
AEMO Browser services exposed over disparate range of portals	Inconsistent user experience	Maintenance of the disparate portals is costly
Inadequate self-service capabilities e.g.: password reset	Lack of cross-browser capability	Lack of personalisation features

Addressing Future Deliverability of Reforms

Building foundational capability in a strategic way (Option 2) builds capability that we know can be significantly leveraged in two immediate reforms, and that we can reasonably assume will be utilised in future reforms. Option 1 does not deliver any of these benefits.

Known Related Upcoming reforms

DER Data Hub

The DER Data Hub is a *new* data exchange mechanism for DER-related transactions (e.g., DOEs, network constraints). Regardless of its exact form and timing, industry will need a modern and secure exchange mechanism for this

Metering Services Review (Package 3)

The rollout of smart meters is to start in mid-2025 and end in 2030. Basic Power Quality data will need to be transacted between Metering Providers and Distributors. This represents significant volumes of data.

IDX Option 2a will provide data exchange protocols that can securely and reliably handle the data exchange required in these reforms.

IDAM Option 2a provides a solution to store and manage identities of VPP's and others, required for DER Data Hub.

Likely Related Upcoming reforms

Integrating Price Responsive Resources into NEM (Scheduled Lite)

Other reforms in the NEM2025 program

Unlocking CER benefits through flexible trading (FTA2)

We have ~\$220M estimated for AEMO to implement NEM2025 reforms over the next 5 years on the assumption that a strategic foundational capability is available.

We estimate an uplift of 10% associated with these new reforms relate to data exchange, and 5% with identity management that would be required if Option 2 does not proceed.

Unknown future reforms




e.g., ICF's requesting modifications to retail transactions

Rule changes resulting in changes to EMMS

We estimate ~\$100K of schema change related costs per year can be avoided by AEMO if we can leverage foundational capabilities developed in Option 2a, in addition to industry cost savings.

Financial Assessment: Full Scope Delivery (Industry-wide)

For IDAM and PC, Option 2 strategic target state compared to Option 1 addresses the key drivers at a delta TCO of \$44M and \$17M respectively – this is a conservative (high watermark) estimate given industry cost impacts associated with IDAM Option 1 and industry cost savings (benefits) associated with IDAM and PC have not been quantified. IDX Option 2 compared to Option 1 has a delta TCO of \$213M, due primarily to the costs associated with migrating legacy services.

		AEMO Costs		Industry Costs	
		Implementation	TCO	Implementation	TCO
<i>Figures presented to nearest million, with a +/- 40% uncertainty range</i>					
 Identity and Access Management	Option 1	\$4	\$20	\$2	<i>Costs expected but unquantified</i>
	Option 2a	\$21	\$28	\$38	<i>Cost-savings expected but unquantified</i>
 Industry Data Exchange	Option 1	\$10	\$46	\$75	<i>Costs expected but unquantified</i>
	Option 2a	\$51	\$71	\$260	<i>Cost-savings expected but unquantified</i>
	Option 2b	\$42	\$62	\$182	<i>Cost-savings expected but unquantified</i>
 Portal Consolidation	Option 1	< \$1	\$2	< \$1	<i>n/a</i>
	Option 2a	\$6	\$8	\$13	<i>Cost-savings expected but unquantified</i>

Recommendations

PROCEED with IDAM Strategic target state, conservative industry-wide delta TCO of \$44M is justified by the reduction in residual security risk and industry pain point benefits.

UNABLE TO RECOMMEND TO FULLY PROCEED AT THIS STAGE – Industry cost impacts relating to transition reflect a high level of uncertainty, recommend a reconsideration of investment approach (see following slide)

PROCEED with PC strategic target state, conservative industry-wide delta TCO of \$17M is justified by the reduction in residual security risk and industry pain point benefits.

IDX: addressing cost uncertainty & reform delivery congestion

AEMO recognises that industry costs & associated work for IDX – specifically the migration of legacy services - are material in the context of a congested reform delivery agenda, particularly 2025. We conducted a scope re-assessment of IDX to differentiate between scope required to facilitate upcoming reforms (IDX Foundation), and the migration of legacy services (IDX Transition). We recommend a phased investment approach wherein IDX Foundation proceeds and the decision for transition of legacy services is deferred to Q4 2025.

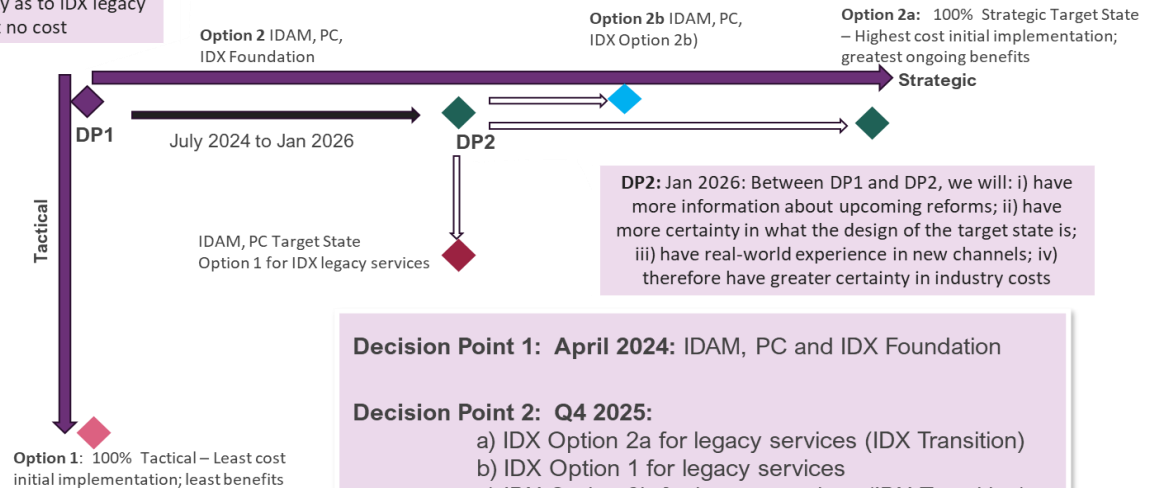
Key Considerations

- Immediate term NEM Reforms (DER Data Hub and Metering Services Review) require new data exchange capability
- Industry participants have identified significant cost uncertainty in IDX Transition (migrating of legacy services), which represents the majority of IDX industry costs
- Substantial reform agenda over 5 years, particularly high delivery congestion in 2025.
- Historically, similar industry-wide changes addressing legacy services are difficult to justify without associated functional benefits for customers. E.g. Open Banking – linked technical uplifts with immediate functional customer benefits such as Osko fund transfers

Recommendation: Phase IDX investment decision and scope across **two decision points**:

- **DP1: IDX Foundational** – scope is to build capability that efficiently supports upcoming new reforms in a secure and extensible way. This does not impose an impact to the transition timeline under DP2.
- **DP2: IDX Transitional (New standalone business case in Q4 2025)** – scope addresses the migration of legacy services. Deferring until Q4 2025 will enable a business case to be developed and decision made with greater certainty of costs and knowledge of upcoming reforms to inform a transition strategy.

DP1: Q1 2024 (business case 1): still preserves optionality as to IDX legacy services at no cost



Decision Point 1: April 2024: IDAM, PC and IDX Foundation

Decision Point 2: Q4 2025:

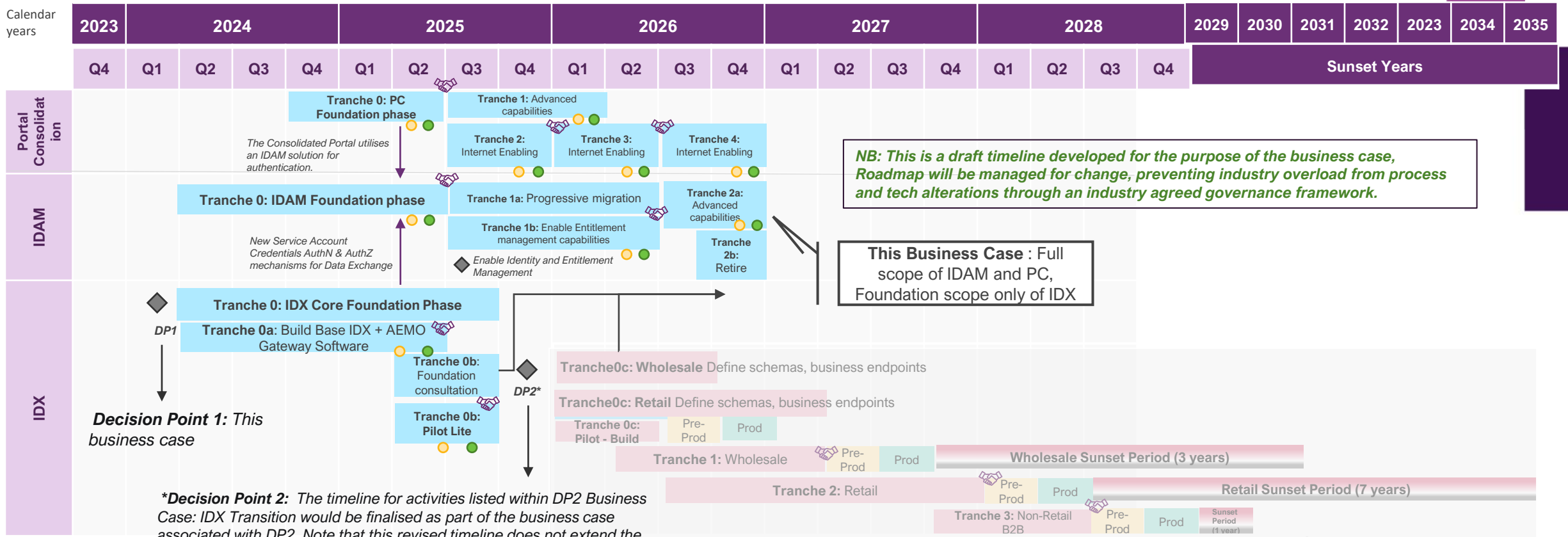
- IDX Option 2a for legacy services (IDX Transition)
- IDX Option 1 for legacy services
- IDX Option 2b for legacy services (IDX Transition)

Draft Phased Investment Delivery Timeline



This timeline was developed in collaboration with industry. To facilitate a phased investment decision approach, we have modified the IDX timeline to divide activities into two decision points – Decision Point 1 (this business case, Q1 2024) for IDX Foundation and Decision Point 2 (a new business case, Q4 2025) for IDX Transition. This has involved a sharp reduction in scope for Tranche 0b to minimal activities only.

Calendar years



NB: This is a draft timeline developed for the purpose of the business case, Roadmap will be managed for change, preventing industry overload from process and tech alterations through an industry agreed governance framework.

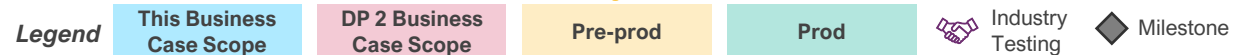
This Business Case : Full scope of IDAM and PC, Foundation scope only of IDX

Decision Point 1: This business case

***Decision Point 2: The timeline for activities listed within DP2 Business Case: IDX Transition would be finalised as part of the business case associated with DP2. Note that this revised timeline does not extend the previously socialised timeline in total.**

DP 2 Business Case: IDX Transition scope only*


To facilitate a deferred IDX Transition decision point, we have divided what was previously Tranche 0b into two components – a minimum Tranche 0b and a Tranche 0c. Total scope has not changed, rather the scope has been divided to enable a clear DP2. The approach for the new minimum Tranche 0b is to target only minimum (1 per domain) business services for pilot, define minimal schema required for design to be understood in principle, and “AEMO-led” framing of strawman for discussion, in order to provide cost and effort efficiencies for participants.



Financial Assessment: IDX Foundation Revised Scope (Industry Wide)



For AEMO, this division of scope and consideration of financial impacts based on *new services only* yields a \$9M clearly superior TCO for developing this capability holistically (Option 2 IDX Foundation) rather than initiative by initiative (Option 1). In industry, the prevailing view is that there would also be efficiency gains in Option 2 compared to Option 1, although the degree of efficiency gain was unable to be quantified.

New Services Only		AEMO Costs		Industry Costs		Recommendation
		Implementation	TCO	Implementation	TCO	
<i>Figures presented to nearest million, with a +/- 40% uncertainty range</i>						
 Industry Data Exchange	Option 1 (new initiatives)	n/a	\$29	n/a	> \$47	PROCEED with IDX Strategic target state Foundation phase, AEMO investment of \$20M over 2 years
	Option 2 (IDX Foundation only)	\$20 ¹	\$20	~\$47 ²	~\$47	

	Scope of Option 1 (new initiatives):	Scope of Option 2: IDX Foundation Only
Implementation	Nothing – no cross-initiative foundational capability is developed ahead of new NEM reform initiatives	Establish Foundational data exchange capability for energy transition and industry-driven priorities that can be used in upcoming reforms. Specifically, reduce Scope of Tranche 0b to limit the pilot, minimise consultation on legacy services schema to be 1-2 services per domain.
Ongoing (new reforms)	For each upcoming reform, data exchange requirements are assessed and solutioned for in independent consultations and design processes.	The data exchange component of new reforms has been budgeted on the basis of this framework already being developed and tested and consultations conducted.

1. In assessing AEMO's cost impact for this revised (reduced) scope of Tranche 0b, we determined a cost split of the original \$13M Tranche 0b cost into a revised scope Tranche 0b of \$4M and a new Tranche 0c of \$9M.
2. The only submissions received for IDX Foundation (revised) vs IDX Transition suggested that the bulk of industry costs would apply to IDX Transition. Incorporating the ratios from those submissions into the model brings the total to \$47M.
3. Cost submissions from participants have continued to present the view that Option 2 should be more cost efficient than Option 1 given the availability of fit for purpose foundational capability to support establishment of new business services. Given the lack of certainty on a specific scaling factor, AEMO has reflected the prevailing view of greater cost efficiency by showing the Option 1 estimate as ">" Option 2 cost estimate.

Future Extensibility and “Upside”

For all three initiatives of IDAM, PC and IDX Foundation, Option 1 has inherent uncertainty that could require further (unplanned) investment and constrained benefit opportunities while Option 2 target state has potential upside benefits. Foremost among these are the opportunities to extend to WEM and gas markets.

Dimension	Option 1	Option 2
Risk of increased complexity identified during design / build	In Option 1, the risk is inherent as a result of uplifting multiple legacy technology platforms – custom, legacy systems tend to have unidentified complexities	Option 2 target state architecture provides an agile, extensible framework that is ‘secure by design’, hence the risk to deliver new capability is contained
SOCI requirements may increase as the vulnerability /risk assessments continue to be conducted	Option 1 leverages legacy platforms and is likely to drive further investment due to the reactive design	Option 2 is ‘Secure by design’ and investment in new capability reduces risk of additional investment
Implications for other energy markets	Option 1 would require duplicated investment to uplift technology stacks in other markets	Option 2 provides a framework that can be leveraged by other markets at lower cost. As an example, we know that WEM is looking to develop DER data hub-related transactional capability.
Scalability and Flexibility	Option 1 has no provision to support increasing digitisation of the energy landscape. Future reforms would require uplifting the systems in silo and duplicating efforts and could also pose risks that current systems are not prepared to meet the rapid transformation.	The Framework in Option 2 is extensible to support non-market interactions and increasing digitisation of the energy landscape. The need for this will grow with the increasing digitisation of the energy landscape (e.g., AER can leverage this when interacting with participant organisations)

2. Purpose

Context

Key Drivers and Challenges

Problem Statements

Identified Industry Pain Points

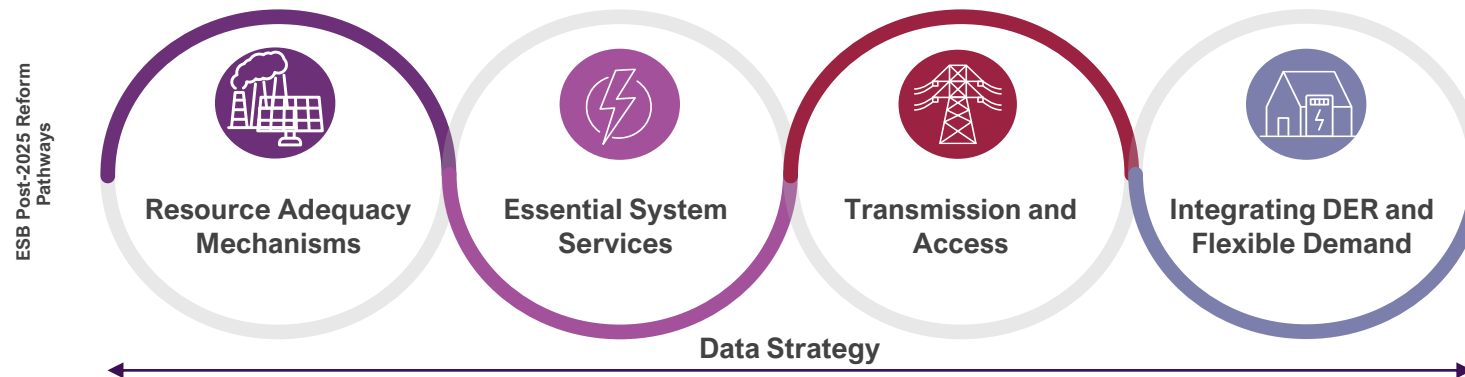
Initiative Objectives

Addressing Challenges Strategically

Context

The Energy Security Board (ESB) was tasked by the former Council of Australian Governments Energy Council (COAG EC), to advise on design changes required in the National Electricity Market (NEM) as it transitions from a fleet of largely coal-fired generation to more variable renewable generation.

The ESB divided the work into four interrelated reform pathways complemented by a Data strategy for the NEM. The National Cabinet subsequently approved the Post-2025 reform recommendations on 29 October 2021.



- One of the main enablers for the NEM Reform Implementation Program (~\$300M) is the development of IT systems and business processes.
- IDAM, IDX and Portal Consolidation were identified as a set of foundational and strategic initiatives within the NEM reform implementation program to provide foundational frameworks that the upcoming reform initiatives can leverage.
- This provides an opportunity that life-cycle type investment can be brought forward and delivered in the same timeframes as the reforms to avoid the duplication of investment
- Central to the success of the Foundation and Strategic Initiatives is AEMO's commitment to fostering collaborative relationships with stakeholders across the energy spectrum. Over a period of 6 months and 10 consultative forums, AEMO has developed a conceptual target state, a transition strategy and a strawman roadmap for these initiatives in collaboration with the industry

Key Drivers and Challenges



Energy Industry Transformation

Energy Transition imposes the **most significant set of reforms** on the Australian energy industry since the creation of the NEM

We are at a pivotal juncture: whether to allocate these resources **strategically** to provide a secure and fit-for-purpose technology foundation to deliver better consumer outcomes, or to take a **tactical, reactive and fragmented** approach, compounding complexity in AEMO and participant IT landscapes, increasing implementation and operational expenses and reducing agility to respond to change.



Security Concerns

The interconnectivity of the energy sector and digitisation of the grid is **increasing the surface area** of potential vulnerabilities that can be exploited, and the impact if security is breached

Community expectations and government directives and legislation impose additional accountabilities and responsibilities for AEMO and industry to safeguard the critical services we collectively operate and protect our customers from impact

The presence of multiple routes for managing identities and access, coupled with non-standard data exchange protocols and patterns, existing alongside diverse entry points to AEMO services collectively represent an **unacceptably vulnerable landscape**.






Industry Pain Points

The existing landscape of IDAM, IDX and PC requires industry participants to interact through different access points, causing an inconsistent, fragmented and duplicated user experience when accessing AEMO's systems. This leads to higher ongoing operational costs for AEMO in activities needed to support the performance of its functions. This has a cascading effect of administrative burden for the participants.

For example: current IDAM current services are disparate, requiring user to retain multiple sets of credential. AEMO's existing data exchange mechanisms use inconsistent standards, protocols and format

Key Challenges

-  **End of Life, Disparate Identity and Authorisation Platforms**
Security posture must be strengthened to address susceptibility to cyber-attacks by nation-state actors and cyber criminals and provide support for new regulatory obligations.
-  **Fragmented and Insecure Industry Data Exchange**
Inconsistent protocols and standards are not prepared to meet the rapid transformation & innovation, driving increase tactical spend to support change, maintenance cost, whilst reducing agility to adapt.
-  **Inconsistent Portal Services**
Multiple distinct Portals offer inconsistent user experience, require multiple credentials to access services and do not provide a foundation to support new services

Problem Statements – IDAM, IDX and PC

The current state of identity and access management, industry data exchange and multiple portals present specific challenges which require to be resolved to achieve strategic and initiative objectives.



Identity and Access Management

Problem Statement:

AEMO's Identity and Access Management (IDAM) services are disparate, requiring users to retain multiple sets of credentials in order to access AEMO business services. The legacy IDAM services do not implement best practices in cyber security controls (e.g., multifactor authentication) and are insufficient to meet new industry obligations introduced under the SOCI Act.



Industry Data Exchange

Problem Statement:

AEMO's existing data exchange systems have been variously acquired over the last 10-15 years, and use inconsistent standards, protocols and formats. AEMO's markets are also undergoing significant transformation, resulting in new data exchange needs. AEMO introducing new data exchange patterns without a unified target state and roadmap is inhibiting participants from modernising their systems and quantifying the benefits of their investments.



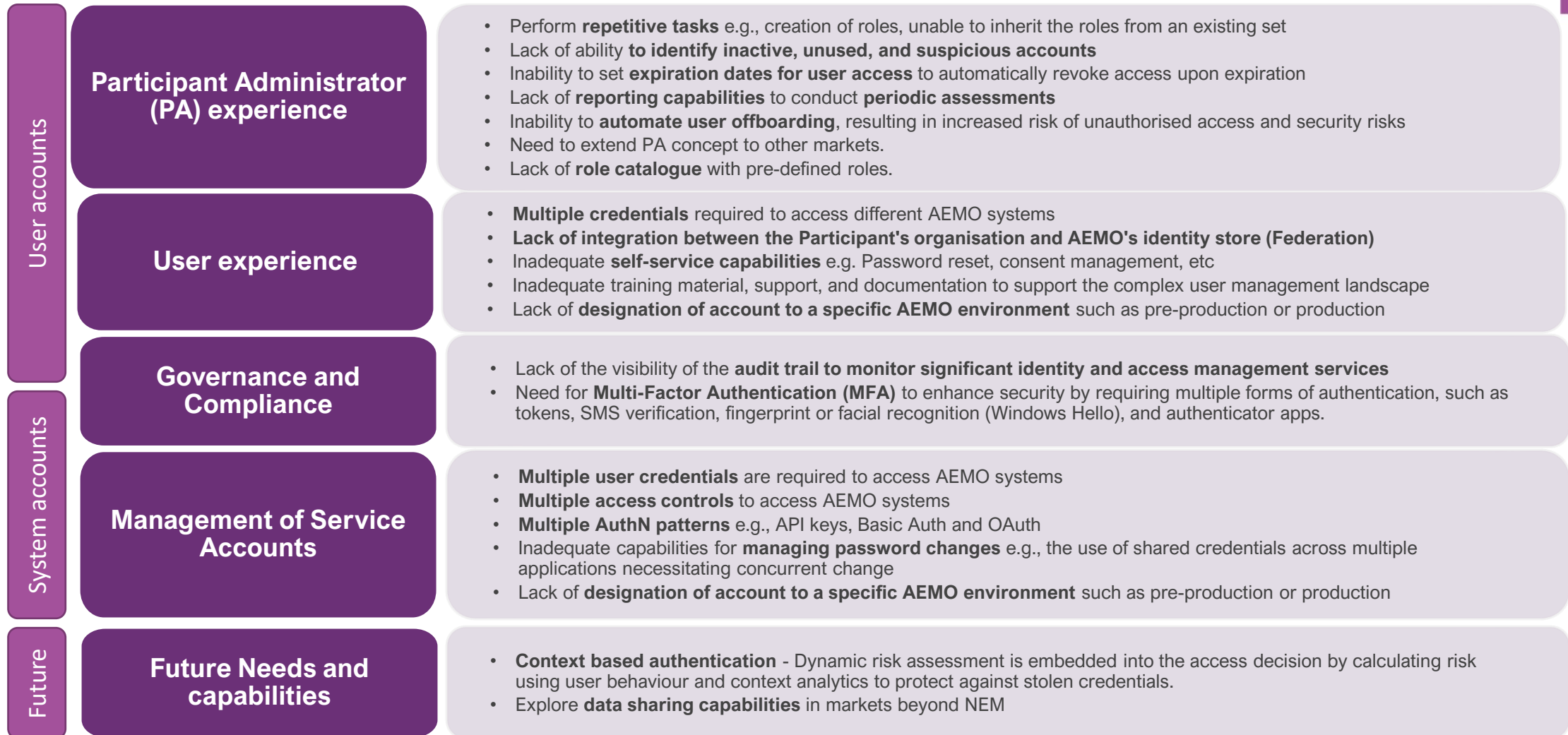
Portal Consolidation

Problem Statement

AEMO browser services are exposed over a disparate range of end points and require multiple sets of credentials to consume these services. This results in a suboptimal user experience for energy stakeholders. The requirement to access browser services via private networks creates technical barriers to consuming these services.

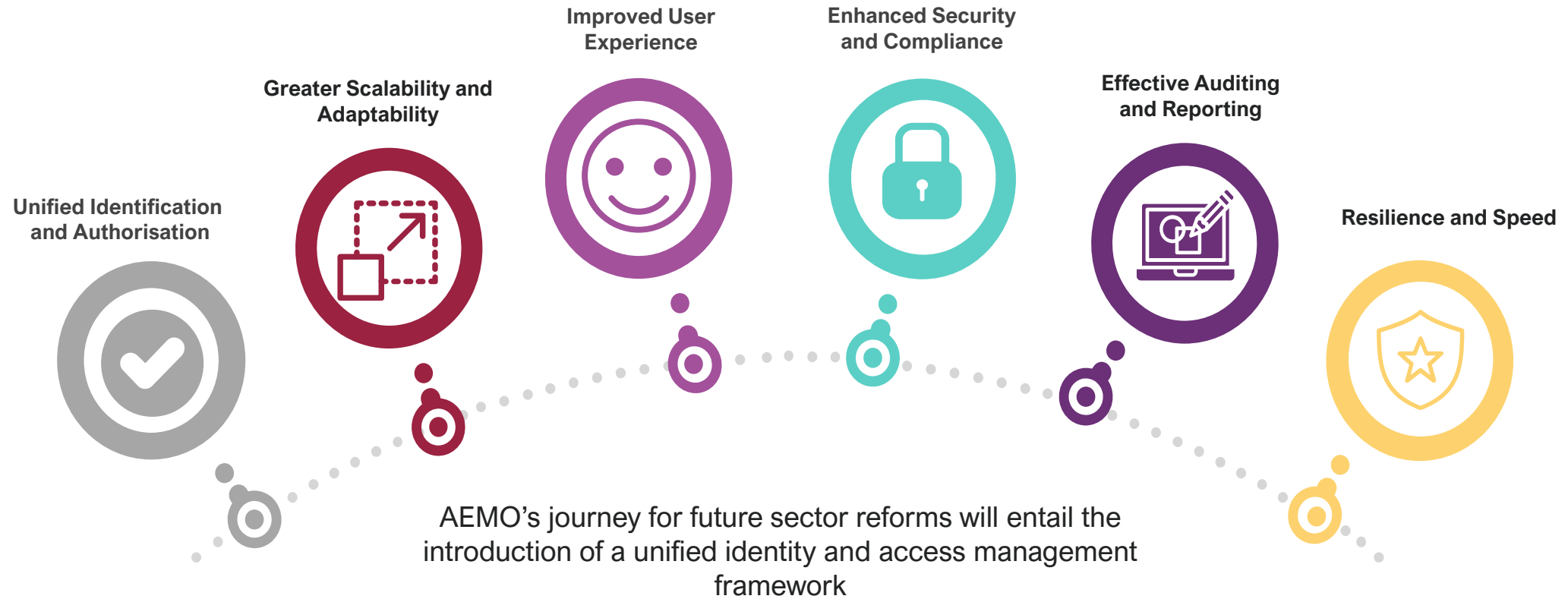
IDAM Industry Pain points Summary

Below is a summary of the key pain points from Business and Technical focus group discussions, classified into themes according to the challenges they pose to the legacy IDAM services.



IDAM Objectives

IDAM enables the foundations for future reforms and secures Australia's energy sector essential operations.



IDX Industry Pain Point Summary

Below is a summary of the key pain points from Business and Technical focus group discussions, classified into themes according to the challenges they pose to IDX services.

Complexity and inconsistency

- Protocols, formats and standards are inconsistent and unnecessarily convoluted.
- Lack of consistent standards across Systems / Fuels / Jurisdictions

Define Roadmap

- There is no clear data exchange roadmap for future capabilities.
- Legacy exchange methodologies & need for data exchange roadmap definitions (target & transition state)

Manage Cost-Effective Change

- Provide cost effective centralised services to reduce industry cost
- Mandatory schema updates are costly, aseXML schema version change mandates industry to upgrade the aseXML schema even if the Participants do not have any procedural impact to the changes.

Opportunities in the Future

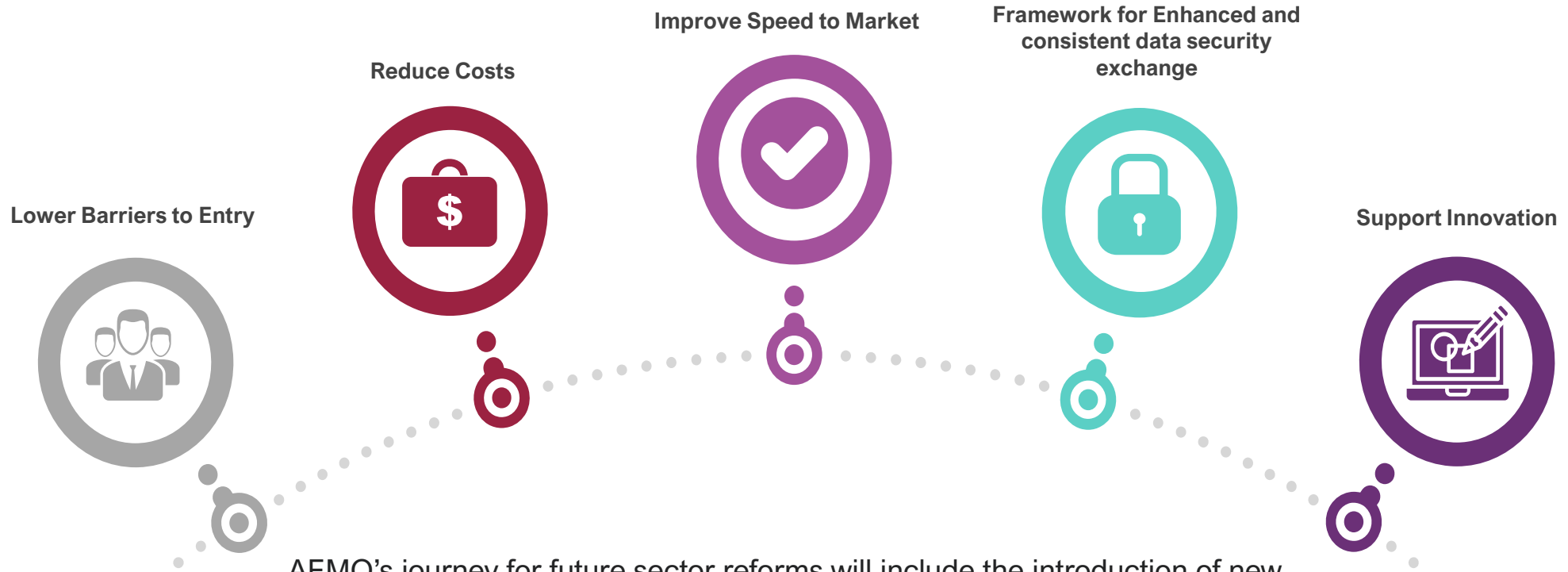
- Near real-time visibility of critical market transactions.
- Enhanced security for data exchange and centralised access management.
- Improved speed to market of business and regulatory changes.
- Improved management of higher volumes of market data.
- Improve developer experience.
- Harmonised data exchanges between participants and AEMO market systems
- Improved customer outcomes.
- Better transparency of future maintenance costs for data exchange systems
- Unified data exchange standards across markets, fuels and jurisdictions.

For AEMO to consider

- Event-based solution - Markets using AEMO-provided integrated data model (NEM) incur less cost than those not using (Gas or WEM).
- Alternate data consumption pattern - Consumption of query able & interoperable data in a simple & standard way.
- B2M and B2B systems integrated to provide operational and industry efficiency, reducing resources, time and cost involved in delivering the service.

IDX Objectives

IDX solution will provide industry standardised channels, protocols, and capabilities to provide a seamless integration of data exchange.



AEMO's journey for future sector reforms will include the introduction of new integration channels, patterns, protocols and payload formats to simplify and uplift the way data is exchanged between AEMO and the industry.

PC Industry Pain Point Summary

Below is a summary of the key pain points from Business and Technical focus group discussions, classified into themes according to the challenges they pose to Portal Consolidation.

User Experience

- **Disparate portals:** AEMO's browser services are exposed over a disparate range of portals that require users to switch between multiple URLs and maintain multiple credentials. The user experience for portals is also inconsistent across different markets and domains.
- **Cross browser compatibility:** Browser standards should be supported for endpoints and different devices e.g., Chrome, Safari, IE, Edge, mobile devices

Cost & Complexity

- Maintenance of the disparate portals is costly (e.g., costs associated with training users and support costs).

Training, Support and Documentation

- Inadequate resources for training, support, and documentation was highlighted. Participants struggle with unclear and scattered documentation, inadequate support from AEMO, and a lack of comprehensive knowledge of the portals.

Future Needs and Capabilities

- **Personalisation features:** Currently there are inadequate personalisation features available on the portal (e.g., participants cannot create shortcuts to access web applications per their requirements).

PC Objectives

The Portal Consolidation solution will provide a consistent and unified user experience and empower self-service.



Addressing challenges strategically



Energy Market Investment

Investment expenditure has been earmarked to support NEM Reform and the transition to a modern energy system. We are at a pivotal juncture: whether to allocate these resources **strategically** to provide a secure and fit-for-purpose technology foundation to deliver better consumer outcomes, or to take a **tactical, reactive and fragmented** approach, which carries the inherent risk of heightened complexity and increasing implementation and operational expenses.

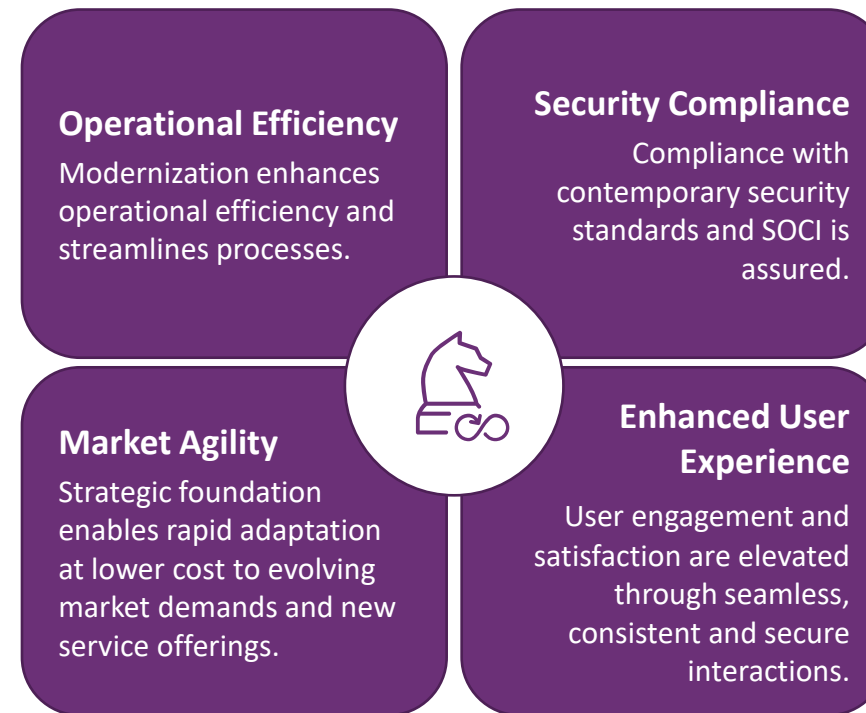


Long Glide Path

The strategic allocation of investment will facilitate the acceleration of upcoming reforms, for example DER, Scheduled Lite, while establishing a resilient foundation to ensure compliance with SOCI regulations. This includes fortifying infrastructure and implementing scalable technology to enhance the security of the energy market.

The provision of transitional support capability over an extended sunset timeframe provides participants the **flexibility** to opt-in to new capabilities, enabling them to effectively manage their transition within a timeframe that aligns with their individual priorities.

Addressing these pivotal challenges is a means to optimise security and operations. It positions the industry at the forefront of *market adaptability* and *innovation* within the dynamic energy landscape.



3.Options Considered

Options Development Approach

Business Case Options Overview

Scope of Option 1

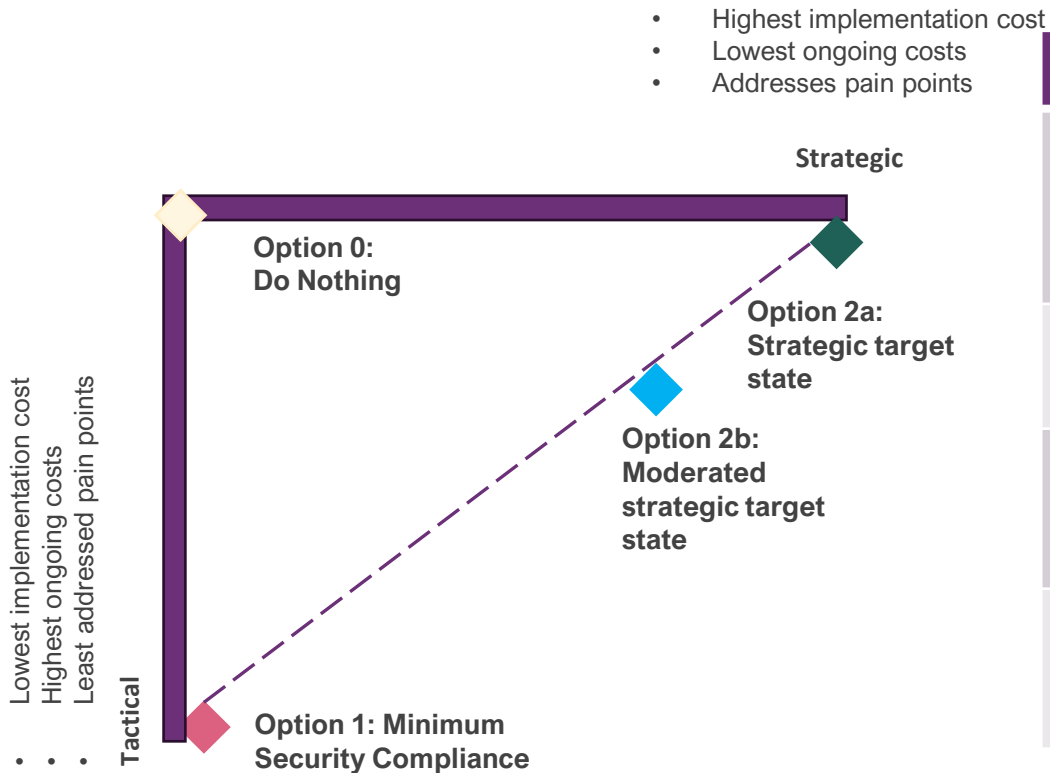
Scope of Option 2a

Phased Investment for Option 2a Scope

Scope of Option 2b

Options Development

We identified two main options which “bookend” the many possible options available: A tactical “minimum compliance” Option 1 and the target state solution Option 2a. Other available hybrid options could be finessed during Delivery.

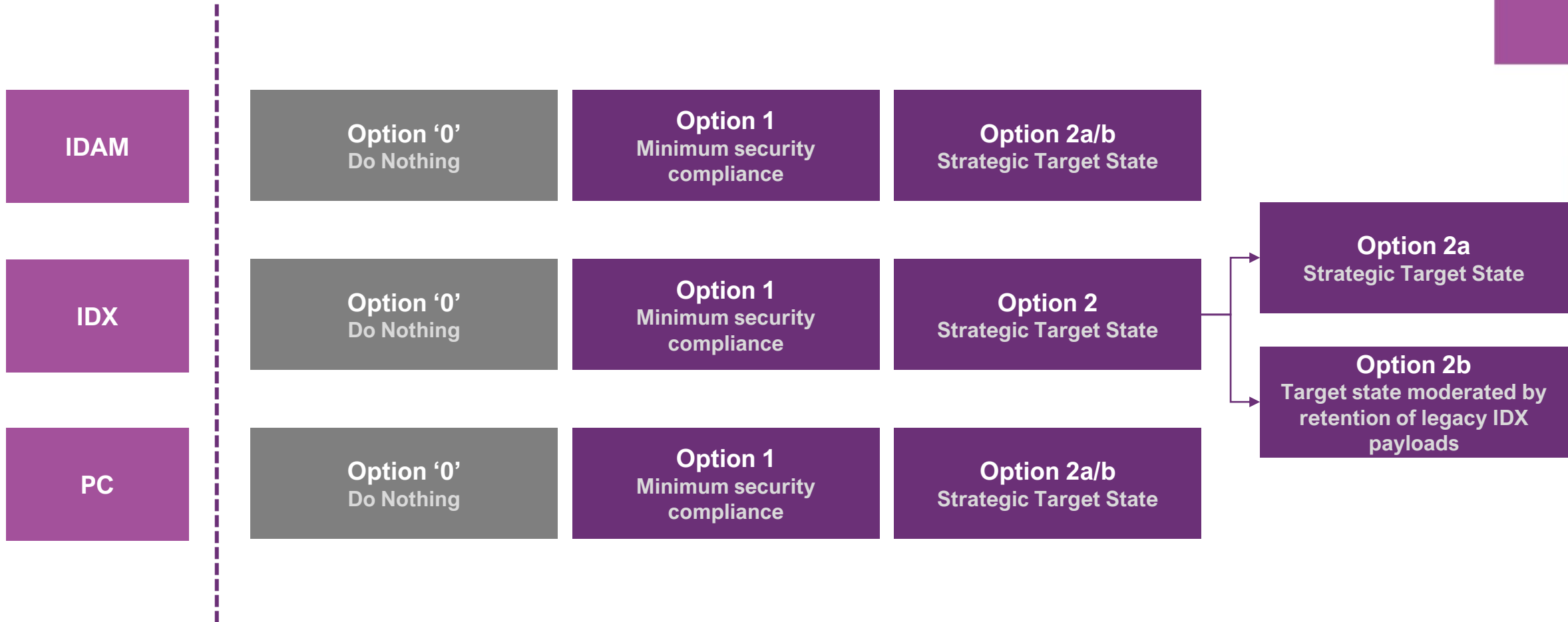


Option	Description
Option 0 – Do Nothing	We conducted a risk assessment against current system landscape & found this option unacceptable – our SOCI compliance obligations would not be met & cyber risks are unacceptably high . This option has therefore been discounted from further analysis.
Option 1 – Minimum Security Compliance	This option addresses the most egregious security risks from Option 0 and puts in controls to address the remaining risks.
Option 2b – Strategic target state moderated by retaining legacy payloads	This option arose during industry consultation as a potential hybrid option that dilutes the full benefits of target state in order to reduce estimated costs. It does not address all industry pain points.
Option 2a – Strategic target state	This is the strategic target future state, as collaboratively designed with industry to address identified industry pain points, enable deliverability of future reforms and materially address security risks.

While there are many hybrid options that could be considered reflecting different scope parameters, to simplify the analysis of the business case we considered options representing the minimum and maximum scope.

As the target state sets a ‘high’ bar in terms of cost, it is anticipated there is only upside should opportunities to rationalise or change scope be identified during Delivery, especially during the Design and Consultation phases.

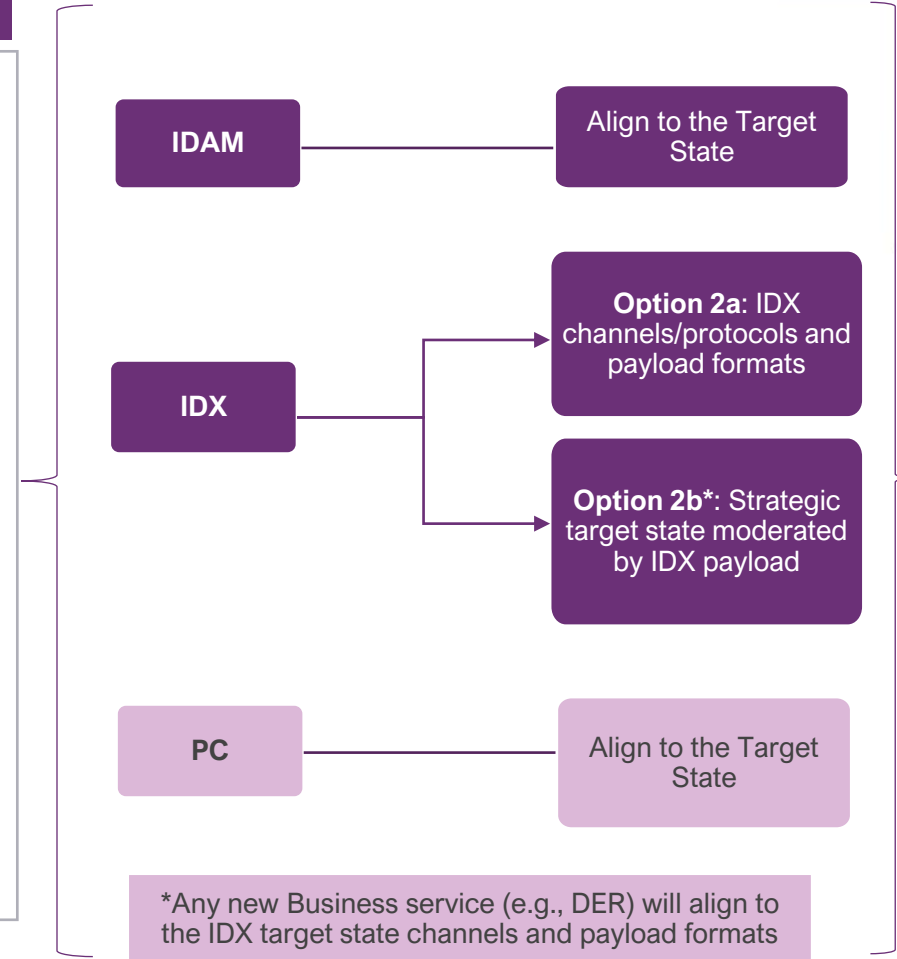
Business Case Options Overview



Charting Future Success: Business Case Options

Discounted

Option 0: Do Nothing	Option 1: Minimum security compliance	Option 2: Strategic Target State
<p>AEMO considered the most extreme tactical option of doing nothing and performed a risk assessment against it – assuming that existing platforms will continue to be used in their current form.</p> <p>A consequence of this approach is our SOCI compliance obligations starting on August 2024 would not be met under this Option. Likewise, this option does not provide any foundational capability to support Energy Transition nor other energy markets. No Industry pain points are addressed under this option.</p> <p>Given the above, this option is untenable for both AEMO and the industry.</p>	<p>IDAM:</p> <ul style="list-style-type: none"> MVP focused on addressing legislatively-driven requirements such as SOCI and AESCSF to enhance the security posture <p>IDX:</p> <ul style="list-style-type: none"> Enhance data exchange cyber controls, addressing legislatively-driven requirements <p>Portal Consolidation:</p> <ul style="list-style-type: none"> Integrating IDAM MVP to address legislatively-driven requirements 	<p>Establish Foundational capability for energy transition and industry-driven priorities</p> <p>IDAM:</p> <ul style="list-style-type: none"> A phased investment approach delivering a holistic IDAM capability as defined in an agreed target state. <p>IDX:</p> <ul style="list-style-type: none"> Option 2a: A phased investment approach delivering IDX channels/protocols and payload formats as defined in an agreed target state. Option 2b: A phased investment approach delivering IDX channels/protocols and retain current payload formats for the legacy services. <p>Portal Consolidation:</p> <ul style="list-style-type: none"> A phased investment approach delivering a holistic Portals functionality as defined in an agreed target state.



Scope of Option 1

As a market operator, AEMO is subject to security regulatory obligations under the Commonwealth Security of Critical Infrastructure Act (SOCi). Option 1 aims to build an MVP focussed on uplifting the security posture addressing legislative-driven requirements such as SOCi, AESCSF. Option 1 focuses on transitioning the services of the **NEM market only**.

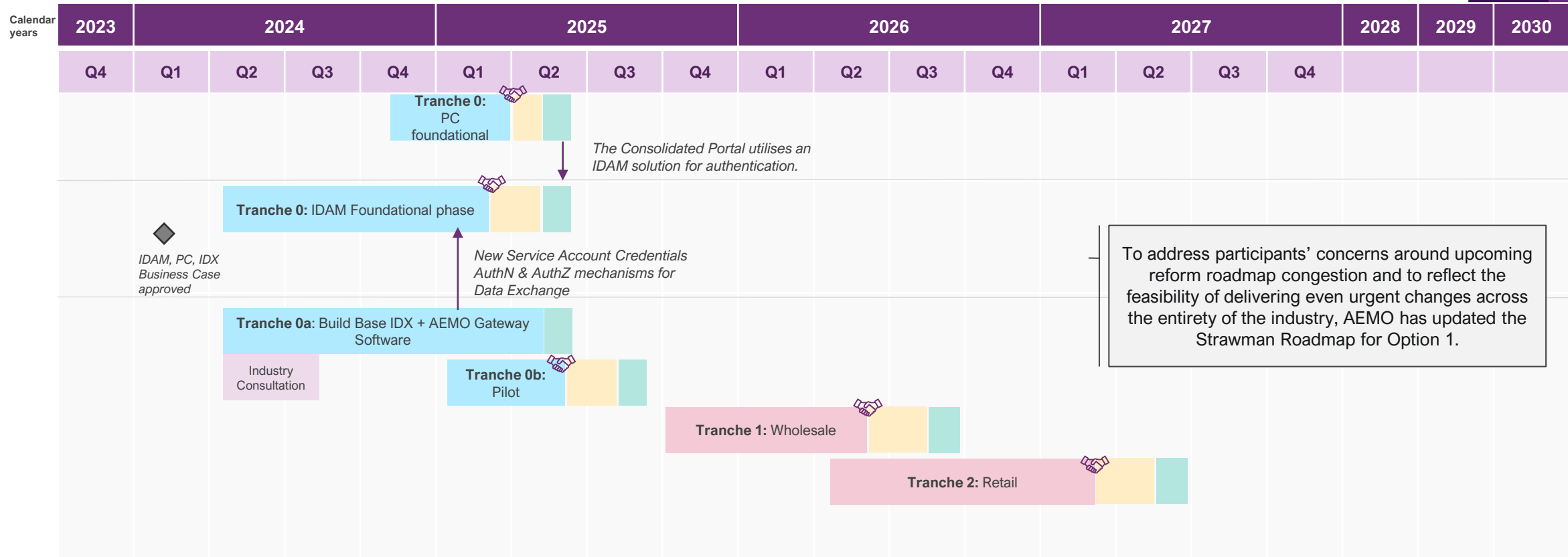
Indicative* Scope of Option 1

In Scope
IDAM
✓ Implement Multi-Factor Authentication (MFA) to enable two-step authentication for the browser services
✓ Enhance self-certification management process
IDX
✓ Enhance the security of the data exchange:
a) Move from FTP to SFTP for file-based transfer
b) Move to OAuth for API interactions
• Basic Auth to OAuth
• API keys to OAuth
• Cert-based to OAuth
c) Deliver secure solution for large file transfer e.g. MSATS snapshot reports
PC:
✓ Enhance existing browser services to integrate with IDAM to address legislative requirements
✓ Retire standalone MSATS browser URL , now available in Markets Portal

Out of Scope
IDAM
× Consolidation of identity and entitlement stores within AEMO
× De-duplication of user accounts
× Support for identity federation
× Self-service (for signup, password reset)
× Advanced data sharing capabilities
IDX
× Standing up foundational capabilities for upcoming reforms
× Transition of the interfaces from other markets and fuels
PC
× Browser services will not be internet-enabled

**AEMO has undertaken a high level a risk assessment as a part of cyber strategy development to identify the risk related to inadequate security governance and cyber security posture. Option 1 scope captures at a high level the activities required*

Strawman Timeline for Option 1



- **Option 1 aims** to build an MVP focussed on uplifting the security posture addressing legislative-driven requirements.
- IDAM tranche 0 will deliver Multi-factor authentication (MFA) and an enhanced self-certification management process by uplifting the legacy services.
- IDX Tranche 0 will be integrated with IDAM and will move to SFTP for file-based transfer and OAuth for API interactions to enhance the security of data exchange
- **Retail Tranche Pre-requisite:** Participants must have an OAuth provider
- In Option 1, Tranche 3 (Retail non-B2B) has been incorporated in Tranche 2

Legend

Foundational Tranche
Transitional Tranche
Pre-prod
Prod
🤝 Industry Testing
 ◆ Milestone

Full Scope of Option 2

AEMO has received an industry-wide agreement to unify Identity and Access Management platforms, as well as Data Exchange patterns and protocols across all jurisdictions, markets, and fuels. However, it is important to note that the transition to the target state will only pertain to the NEM services. This business case outlines the costs associated with developing the target state applicable to all fuels and markets, but the transition will only be for the NEM business services.

New upcoming initiatives leverage the target/transition state protocols and patterns. Migration of interfaces beyond the scope of NEM reform will be implemented via other business reforms.

IDAM Scope Option 2a

- Define & implement target state identity and access management solution
- Implement mandatory cybersecurity uplifts (such as SOCI) and advanced security capabilities such as identity federation, context-based authentication
- Unify the identity and entitlement management stores within the NEM and lay the foundation to extend this capability to other markets such as Gas and WEM through other market initiatives
- De-duplicate / consolidate the user accounts, providing the capability to use a single account to access business functions across multiple markets
- Build Organisation Hierarchy
- Enhance data-sharing capabilities to provide advanced data-sharing permissions
- Enhance Participant Admin experience e.g. Assign multiple PIDs to a role minimising creating duplicate roles at an organisation level when an organisation has multiple PIDs
- Basic and advanced Identity & Entitlement Management Governance & Assurance

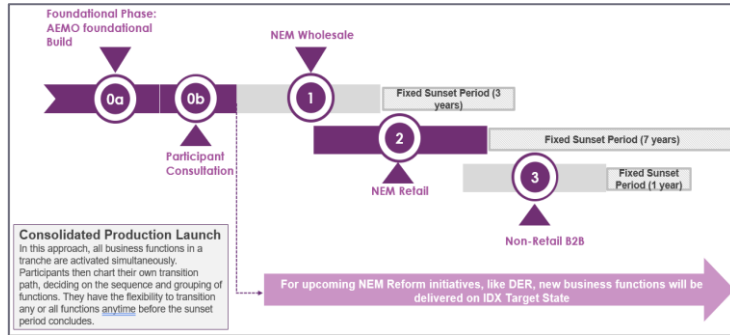
IDX Scope Option 2

- Enhance data exchange cyber controls implementing the legislative driven requirements and obligations such as SOCI, AESCSF
- Define and implement target state channels, protocols, patterns and payload standards
- Unify the data exchange mechanisms across markets and fuels. Define the unified data exchange mechanisms for future Reforms
- AEMO data exchange software is enhanced to provide data exchange mechanisms that are defined in the target state architecture; minimising the gateway development costs for the industry covering all the channels that are defined in the target state architecture
- Transition the current state NEM interfaces to target state; sunset after an industry agreed timeframe
- NEM Retail & Wholesale payload formats for the existing interfaces align to the target state payload standards i.e. JSON payload structure
- Future Reform initiatives leverage the target state patterns & standards including the payload formats i.e. implements JSON payload structure

PC Scope Option 2a

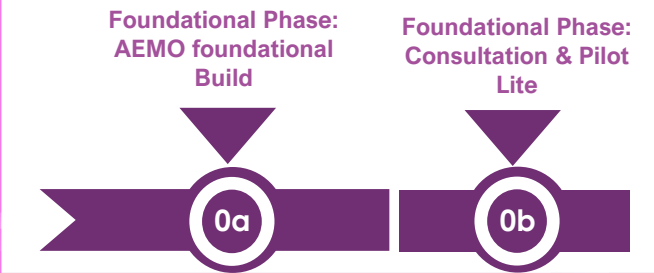
- Enable a single pane of glass; providing a pathway for future unification across fuels and markets
- Implement the capabilities defined in target state architecture e.g. self-serve capabilities, personalised features
- Enable browser services to be accessible via the internet
- Single identity for various browser services/web apps
- Unify the user experience
- Enhance user documentation

Phased Investment for IDX Option 2 Scope

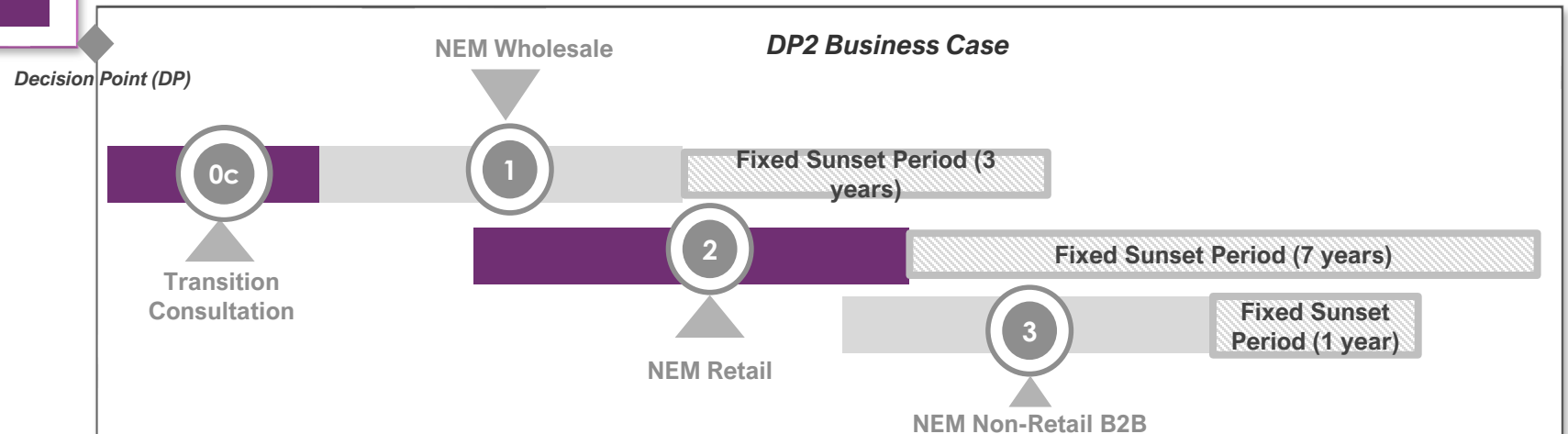


Initial View: IDX Transition Strategy

This Business Case



IDX Phased Investment: To facilitate a deferred IDX Transition decision point, we have divided what was previously Tranche 0b into **two components** – a minimum **Tranche 0b** and a **Tranche 0c**. The total scope has not changed, rather the scope has been divided to enable a clear DP2. The approach for the new minimum Tranche 0b is to target only minimum (1 per domain) business services for pilot, define minimal schema required for the design to be understood in principle, and “AEMO-led” framing of strawman for discussion, in order to provide cost and effort efficiencies for participants.



Revised Scope IDX Option 2

To address participants' concerns around reform roadmap congestion, AEMO has split the scope of IDX option 2 into two components: **IDX Foundation** and **IDX Transition**. The total scope has not changed, rather the scope has been divided to enable a clear Decision Point 2.

This Business Case IDX Foundation

Tranche 0a: AEMO foundational Build

1. In consultation with the industry, define target state channels, protocols, and patterns for the upcoming reforms to leverage
2. Implement foundational infrastructure
3. Enhance data exchange cyber controls implementing the legislative-driven requirements and obligations such as SOCI, AESCSF
4. Define and implement technical standards for the upcoming reforms to leverage (the actual business function schemas would be defined as part of the reforms that leverage IDX)

What does the Industry need to do?

1. Contribute subject matter expertise to business and technical working group to build the foundation
2. Review and approve business requirements developed by IDX working groups
3. Engagement on readiness and testing approach

Tranche 0b: Consultation & Pilot Lite

1. In consultation with the industry, define the scope of the pilot lite
2. AEMO data exchange software is enhanced to provide data exchange mechanisms that are defined in the target state architecture; minimising the gateway development costs for the industry covering all the channels that are defined in the target state architecture
3. Implement pilot lite

What does the Industry need to do?

1. Agree on pilot lite business functions and success metrics
2. Choose if to implement/upgrade AEMO Gateway software
3. Set up participant pilot lite capability
4. Conduct pilot; share findings with IDX working group(s)

AEMO will propose a process and timeframe outside of this business case to progress a further investigation into the scope and timeline for transitioning existing business services for providing an input to DP2 Business Case

DP2 Business Case IDX Transition

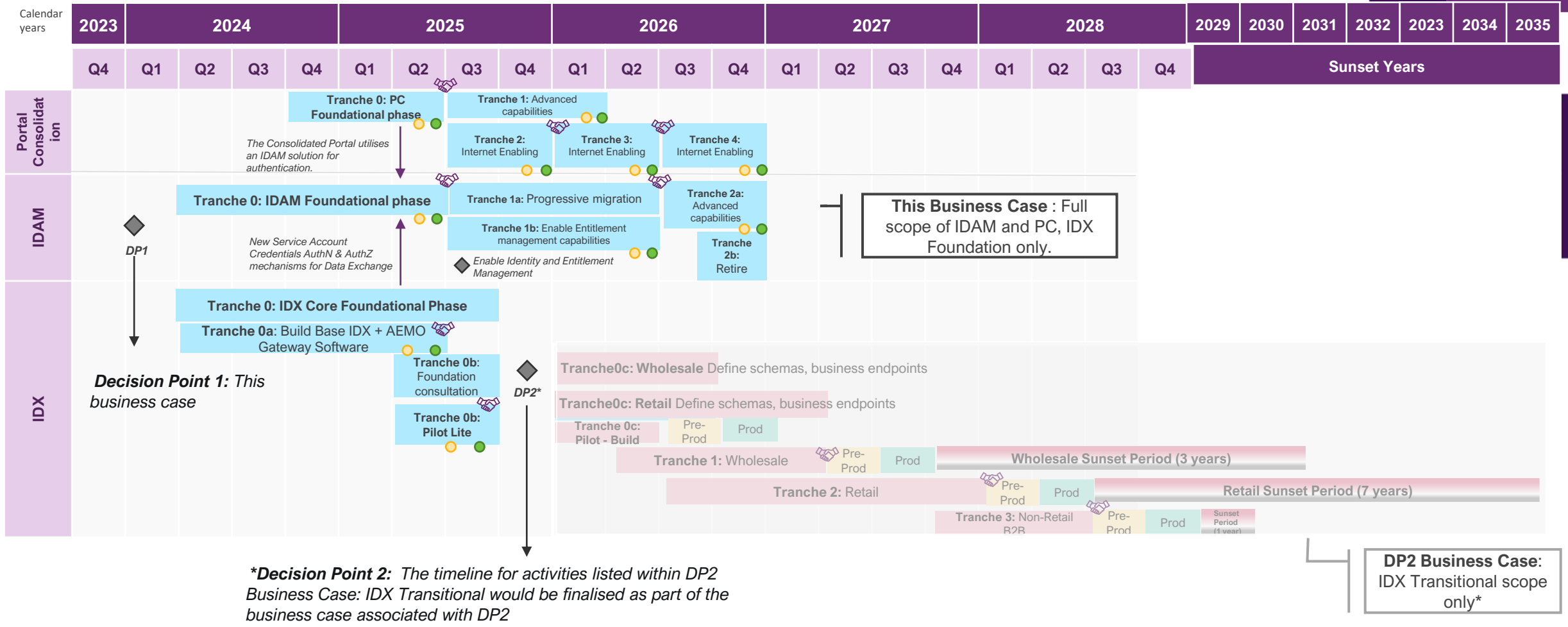
Tranche 0c: Transition Consultation

1. Define the IDX roadmap (timeline for transitioning existing business services, sunset timeframes, etc)
2. In consultation with the industry, define any extensions to target state channels, protocols, patterns to onboard the legacy services
3. Define the target state payload for legacy services (e.g., Option 2a vs Option 2b)
4. In consultation with the industry, define the scope of the pilot
5. Implement the pilot

Tranche 1-3: Transition Existing Services

1. Extension of the IDX infrastructure capacity to support the onboarding of legacy business services
2. Transition the current state NEM interfaces to target state; sunset after an industry agreed timeframe

Revised Strawman Timeline for Option 2



IDX Option 2a vs 2b

Option 2b is the IDX target state moderated by the retention of the Legacy payloads. This option arose during industry consultation as a potential hybrid option that dilutes the full benefits of the target state to reduce estimated costs

IDX Option 2b

The scope of Option 2b is similar to that of Option 2a as it involves building a foundational framework. However, in Option 2b, the NEM Retail & Wholesale payload formats for the existing interfaces will not align with the target state payload standards. This means that the existing NEM Retail interfaces will continue to use aseXML, and the NEM Wholesale interfaces will continue to use AEMOCSV formats.

Future reform initiatives will leverage the target state patterns and standards, including the payload formats.

Descriptions	Option 2A	Option 2B
IDX: Foundation Build	Identical Scope for Option 2A & 2B	
IDX: Target State Data Definitions	Identical Scope for Option 2A & 2B	
IDX: Data Exchange Mechanisms (e.g. Security, Channels, Protocols) for legacy interfaces	Identical Scope for Option 2A & 2B	
IDX: Payload Formats for legacy interfaces	Aligns to Target State Definitions	Retains Legacy Payload Formats

Option 2b: Key Call Out

The foundational tranches for both IDX Option 2a and Option 2b would remain the same, but IDX Transition would change. Legacy services however remain on the existing aseXML payload in Option 2b.

This option was costed in detail from AEMO's perspective to understand potential cost savings attributed to the reduced delivery scope. Very limited responses were received on reduction in industry costs.

We note further that this option does not address the full suite of Industry pain points reducing intangible benefits, note these further reference opportunities to reduce industry cost over time.

Decision on the transition of the legacy services is deferred to Decision point 2 **Q4 2025**

4. Financial Assessment

Financial Assessment Summary
AEMO Implementation Cost
Industry Implementation Cost
AEMO Operational Cost
Industry Operational Cost
Cost Impact on Upcoming Reforms

Summary: This Business Case

		IDAM		IDX		PC		This Business Case	
		Option 1	Option 2a	Option 1	Option 2a/2b (Foundation)	Option 1	Option 2a	Option 1	Option 2a
		Figures presented to nearest million, with a +/- 40% uncertainty range							
AEMO	Implementation cost	\$4	\$21	n/a	\$20	<\$1	\$6	\$5	\$47
	Cost ² impact to support DER, PQ Data (No foundation)	\$3	\$0	\$7	\$0	n/a	n/a	\$10	\$0
	Cost ³ impact to future NEM reforms in absence of foundation	\$11	\$0	\$22	\$0	n/a	n/a	\$33	\$0
	Delta operational cost ¹ to support new capabilities and legacy services	\$2	\$7	n/a ⁴	n/a ⁴	\$1	\$2	\$3	\$9
	Total cost of ownership (12 years for IDX, 7 years for IDX foundation, IDAM & PC)¹	\$20	\$28	\$29	\$20	\$2	\$8	\$51	\$56
	Total cost of ownership with 40% uncertainty increase	\$28	\$39	\$41	\$28	\$3	\$11	\$72	\$78
	Total cost of ownership with 40% uncertainty decrease	\$12	\$17	\$17	\$12	\$1	\$5	\$30	\$34
Industry	Implementation cost	\$2	\$38	n/a	~\$47 ⁶	<\$1	\$13	\$3	~\$99
	Cost ² impact to support DER, PQ Data (No foundation) Cost ³ to support new reforms other upcoming NEM Reform initiatives (in absence of foundation)	Costs expected but unquantified	\$0	> \$47	\$0	n/a	n/a	> ~\$47 ^{2,3}	\$0
	Delta operational cost ⁵ to support new capabilities and legacy services	unquantified	unquantified	n/a	n/a	unquantified	unquantified	unquantified	unquantified

1. All estimates are incremental cost to the projected current baseline
2. Whilst the cost of implementing DER Data Hub and PQ data are covered in those reforms, there is an assumption in those costs that foundational capability would be in place. This cost impact category relates to the cost impacts incurred in the event that foundational capability would not be in place
3. The energy transition will require an increasing volume, diversity and frequency of data exchange between a wider cohort of energy stakeholders to sustain new market processes. Leveraging the estimated impacts for the upcoming reforms, we anticipate a cost impact on the future budgeted NEM program if the foundational capability was not available, estimated at 10% for data exchange, and 5% for identity management.
4. IDX foundation does not result in a net delta to operational cost noting that new NEM reforms will be responsible for assessing any uplift requirements for their own projects and the uplift to legacy services will be assessed at **Decision Point 2**
5. Industry submissions haven't quantified savings for Delta operational cost
6. Based on industry cost submissions and feedback received in earlier submissions

Summary: Full Investment (including DP2 Transition)

		This Business Case (IDAM, PC, IDX Foundation)		DP2 Business Case: IDX Transition of the legacy services			Full Investment		
		Option 1	Option 2a	Option 1	Option 2a	Option 2b	Option 1	Option 2a	Option 2b
		Figures presented to nearest million, with a +/- 40% uncertainty range							
AEMO	Implementation cost	\$5	\$47	\$10	\$31	\$22	\$15	\$78	\$69
	Cost ² impact to support DER, PQ Data (No foundation)	\$10	\$0	n/a	n/a	n/a	\$10	\$0	\$0
	Cost ³ impact to future NEM reforms in absence of foundation	\$33	\$0	n/a	n/a	n/a	\$33	\$0	\$0
	Delta operational cost ¹ to support new capabilities and legacy services	\$3	\$9	\$7	\$20	\$20	\$10	\$29	\$29
	Total cost of ownership (12 years for IDX, 7 years for IDAM & PC)¹	\$51	\$56	\$17	\$51	\$42	\$68	\$107	\$98
	Total cost of ownership with 40% uncertainty increase	\$71	\$78	\$24	\$71	\$59	\$95	\$150	\$137
	Total cost of ownership with 40% uncertainty decrease	\$31	\$34	\$10	\$31	\$25	\$41	\$64	\$59
Industry	Implementation cost	\$3	~\$99	\$75	\$212	\$134	\$78	\$311	\$233
	Cost ² impact to support DER, PQ Data (No foundation) Cost ³ to support new reforms other upcoming NEM Reform initiatives (in absence of foundation)	> \$47	\$0	n/a	n/a	n/a	> ~\$36	\$0	\$0
	Delta operational cost ⁴ to support new capabilities and legacy services	<i>unquantified</i>	<i>unquantified</i>	<i>unquantified</i>	<i>unquantified</i>	<i>unquantified</i>	<i>unquantified</i>	<i>unquantified</i>	<i>unquantified</i>

1. All estimates are incremental cost to the projected current baseline
2. Whilst the cost of implementing DER Data Hub and PQ data are covered in those reforms, there is an assumption in those costs that foundational capability would be in place. This cost impact relates to the costs estimated in the event that foundational capability would not be in place
3. The energy transition will require an increasing volume, diversity and frequency of data exchange between a wider cohort of energy stakeholders to sustain new market processes. Leveraging the estimated impacts for the upcoming reforms, we anticipate a cost impact on the future budgeted NEM program if the foundational capability was not available, estimated at 10% for data exchange, and 5% for identity management.
4. Industry submissions haven't quantified savings for Delta operational cost

4.1 AEMO Implementation Costs

Estimation Approach for Option 2

Scaling factor for Option 1

Total Implementation Cost Summary

IDAM Implementation

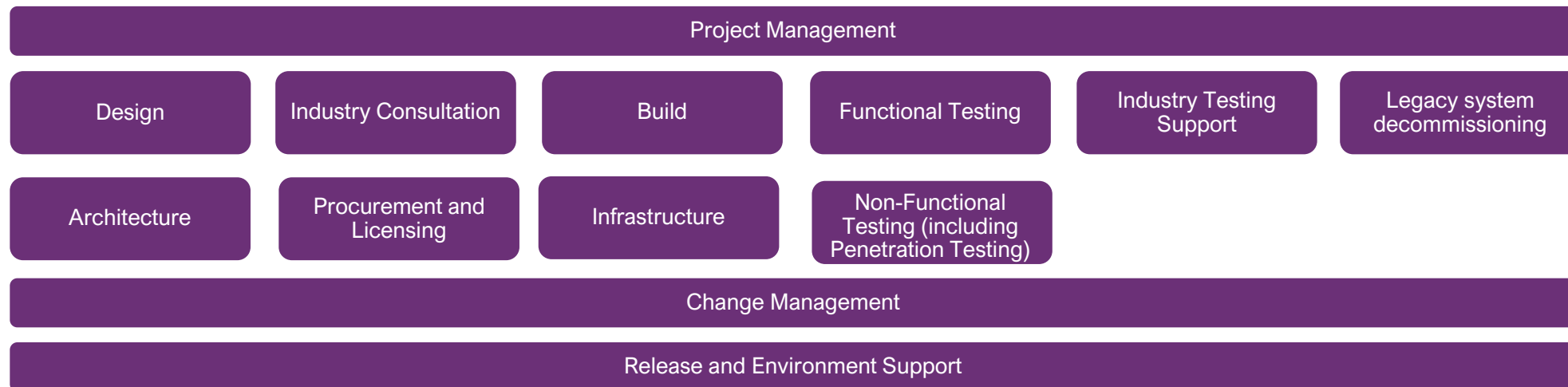
IDX Implementation Cost

Portal Consolidation Implementation Cost

AEMO Cost Estimation Approach: Option 2a

The **AEMO Implementation Costs** (Investment Costs) for the IDX, PC and IDAM initiatives are based on the agreed scope for Option 2a. We completed a bottom-up estimate for each component and validated against (where available) comparable internal and international projects.

Scope of implementation estimate



Updated AEMO Cost Estimation Approach: Option 1

For Option 1, the **AEMO Implementation costs** (Investment Costs) for the IDX, IDAM and PC initiatives have been estimated using a scaling of the Option 2a estimate based on the following assumptions:

		Cost scaling	Assumption
IDAM	Tranche 0	30%	<ul style="list-style-type: none"> Definition of patterns and potential build/license of capability of existing products
	Tranche 1a	0%	<ul style="list-style-type: none"> User accounts remain in existing identity stores
	Tranche 1b	0%	<ul style="list-style-type: none"> No new entitlement capabilities deployed
	Tranche 2a	0%	<ul style="list-style-type: none"> No advanced capabilities deployed
	Tranche 2b	0%	<ul style="list-style-type: none"> No decommission
IDX	Tranche 0a	<ul style="list-style-type: none"> 20% (of AEMO Gateway cost) 50% of Option 2a IC \$3M stand alone cost 	<ul style="list-style-type: none"> To enhance existing PdrBatcher/ Participant batcher to enable SFTP capability. To define deployable OAUTH and sFTP patterns To build MFT and OAUTH capabilities
	Tranche 0b	10%	<ul style="list-style-type: none"> Security design and transition planning and consultations
	Tranche 1	15%	<ul style="list-style-type: none"> Move to sFTP and Oauth, regression and industry testing
	Tranche 2	20%	<ul style="list-style-type: none"> Move to sFTP Basic Auth, API keys and cert based to Oauth Regression and industry testing
	Tranche 3	0%	<ul style="list-style-type: none"> No change
PC	Tranche 0	20%	<ul style="list-style-type: none"> Security updates only
	Tranche 1	0%	<ul style="list-style-type: none"> No change
	Tranche 2	0%	<ul style="list-style-type: none"> No change

AEMO Total Implementation Costs Summary



This Business Case

	IDAM		IDX		PC	
	Option 1	Option 2a	Option 1	Option 2a/2b (Foundation)	Option 1	Option 2a
	Figures presented to nearest million, with a +/- 40% uncertainty range					
Total AEMO Implementation Cost	\$4	\$21	n/a	\$20	< \$1	\$6
Total Implementation Cost with 40% uncertainty increase	\$6	\$29	n/a	\$28	\$1	\$8
Total Implementation Cost with 40% uncertainty decrease	\$2	\$13	n/a	\$14	< \$1	\$4

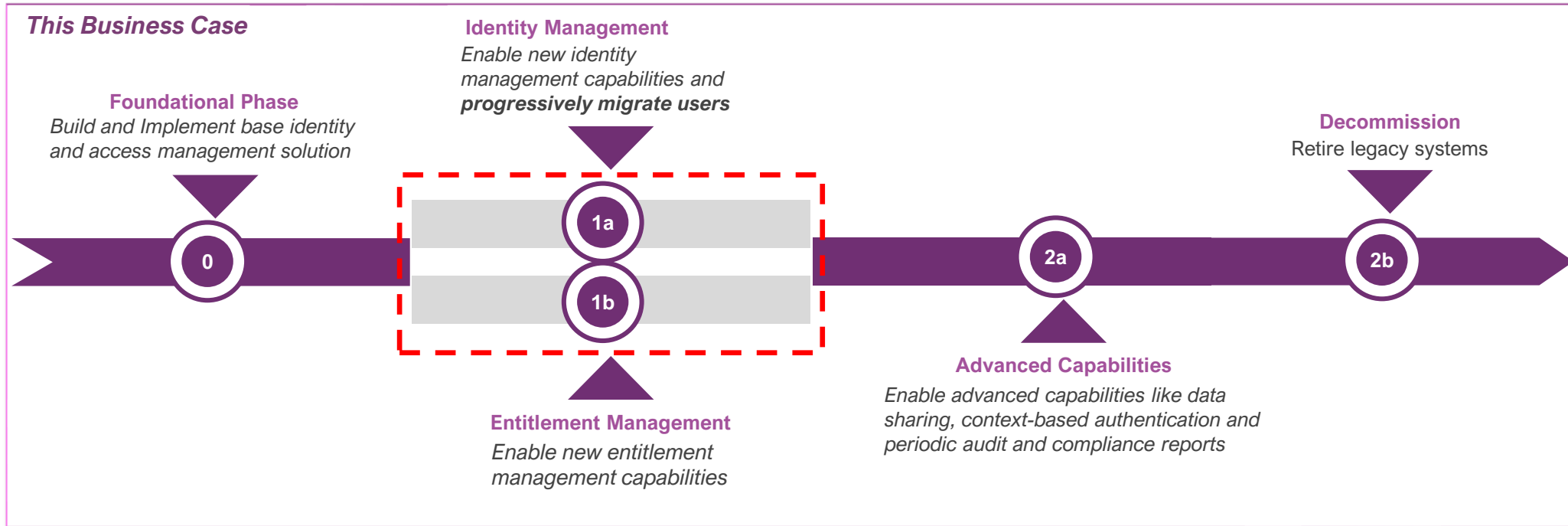
Total Investment

	IDAM		IDX (Foundation + Transition)			PC	
	Option 1	Option 2a	Option 1	Option 2a	Option 2b	Option 1	Option 2a
	Figures presented to nearest million, with a +/- 40% uncertainty range						
Total AEMO Implementation Cost	\$4	\$21	\$10	\$31	\$22	< \$1	\$6
Total Implementation Cost with 40% uncertainty increase	\$6	\$29	\$14	\$43	\$31	\$1	\$8
Total Implementation Cost with 40% uncertainty decrease	\$2	\$13	\$6	\$19	\$13	< \$1	\$4

Notes:

- AEMO's implementation cost estimates have been triangulated using a bottom-up resourcing approach, a top-down effort-based approach and a comparison against similar projects.
- **This Business case** costs are associated with the implementation of the IDAM, IDX and PC initiatives. This Business Case IDX costs are to establish foundational capabilities and doesn't include transition of legacy services.

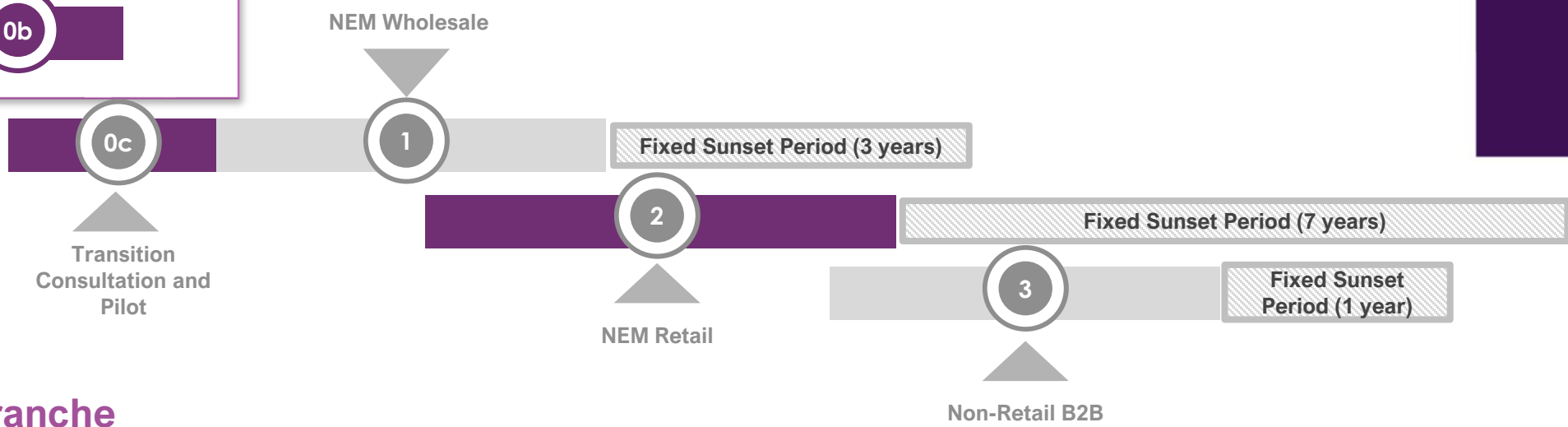
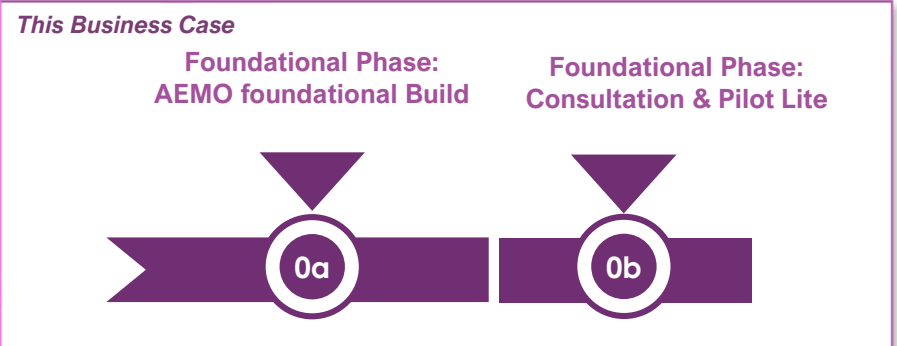
AEMO IDAM Implementation Cost



Implementation Cost by Tranche

Option	Tranche 0	Tranche 1a	Tranche 1b	Tranche 2a	Tranche 2b	TOTAL
	Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range					
Option 1	\$4.2	-	-	-	-	\$4.2
Option 2a	\$13.8	\$0.6	\$0.1	\$5.8	\$0.5	\$20.8

AEMO IDX Implementation Cost



Implementation Cost by Tranche

Option	Tranche 0a	Tranche 0b- Foundation	This Business Case IDX Total
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range			
Option 1	-	-	-
Option 2a	\$16.3	\$4.1	\$20.4
Option 2b	\$15.9	\$3.0	\$18.9



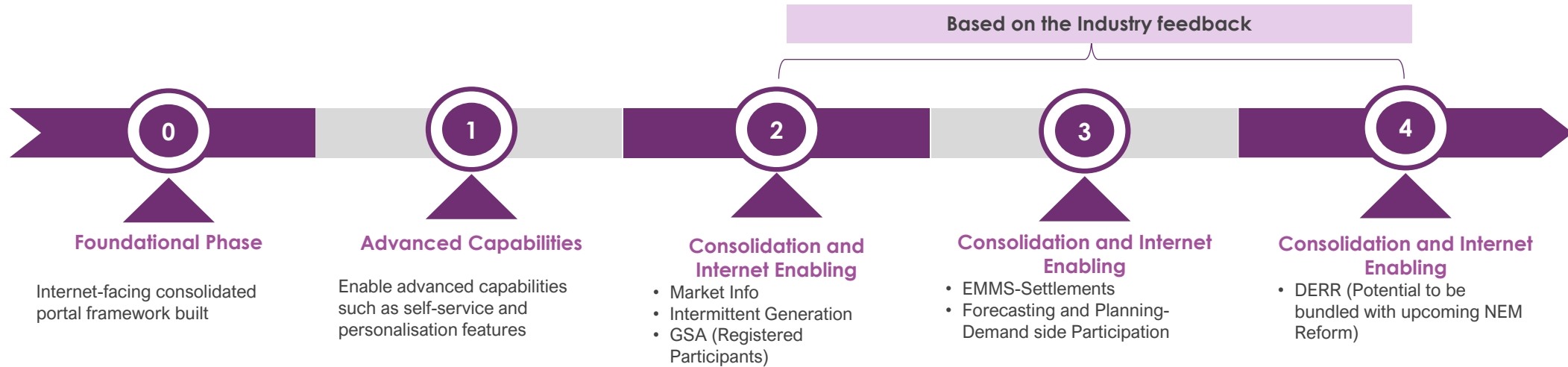
Tranche 0c- Transition	Tranche 1	Tranche 2	Tranche 3	DP2 Business Case IDX Total
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range				
\$9.8	-	-	-	9.8
\$9.3	\$5.4	\$13.8	\$2.2	\$30.7
\$6.6	\$4.4	\$10.9	\$1.5	\$23.4



TOTAL
\$9.8
\$51.1
\$42.3

AEMO Portal Consolidation Implementation Cost

This Business Case



Implementation Cost by Tranche

Option	Tranche 0	Tranche 1	Tranche 2	Tranche 3	Tranche 4	TOTAL
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range						
Option 1	\$0.5	-	-	-	-	\$0.5
Option 2a	\$2.3	\$1.3	\$1.0	\$1.0	\$0.8	\$6.4

4.2 Industry Implementation Costs

Summary of responses

Extrapolation Methodology for Option 2

Scaling factor for Option 1 and Option 2b

Extrapolated Industry Cost

Summary of industry cost submissions

- **Fourteen** submissions were received for Option 2/2a however **two** of those did not have sufficient information to be included in cost extrapolation. Cost coverage has been received for all industry participant types allowing a median cost to be determined noting all outlier costs have been included.
- **Two** submissions were received for IDX Option 2b and **two** submissions were received for Option 1:
 - While these costs were included in the costing for those specific organisations, there wasn't sufficient data available to determine median values across participant types so the scaling estimation methodology has been applied for the rest of industry.
- No submissions identified a net impact to operational cost nor provided a view on quantitative operational or market change cost avoidance
- For IDX, one submission indicated an intent to leverage the AEMO gateway software. Noting the existing footprint of the AEMO gateway software, particularly in wholesale, it is expected there will be a significant volume of deployments of the updated software.

Participant Implementation Cost – Updated extrapolation methodology for Option 2a

Step 1:
Allocate organisations to “participant types”

Type	Definition
Distributor	Has an LNSP role in the NEM, does not provide Contestable Metering Services
Contestable Metering Service Provider	Has an MDP, MPB, MPC role in the NEM, does not have an LNSP role.
Large Gentailer	>1.3 M NMIs
Medium Gentailer	100K to 1.3M NMIs
Small Retailer / Gentailer	< 100K NMIs
Distributor and Contestable metering service Provider	Has an LNSP role in the NEM and operates a contestable metering services business
Independent Generators	Independent generator, does not have a Retail market role



Step 2:
Take the median implementation cost of each participant type

Median Implementation Cost = Midpoint (or the average of two midpoints if number of submissions are even) of the implementation costs submitted by participants*

**Following updated submissions and one-on-one sessions a move to the median from average has been proposed as more cost-reflective, allowing outlier submissions to be included in the total industry cost however not factored into the median calculation for their respective participant type*



Step 3:
Allocate a number of active organisations per participant type

Type	Total No
Distributor	-
Metering Services	-
Large Gentailer	-
Medium Gentailer	-
Small Retailer / Gentailer	-
Distributors and Contestable metering services**	-
Generators**	-



Step 4:
Multiply by the number of active participants of that type + Discrete participant costs

Total Implementation Cost for a participant type =
Median Implementation cost × # of active organisations¹ + Discrete participant submission costs

1. Noting the revised approach to determining a median cost, the median will be applied to participants who fit within the median profile or who have not provided an individual submission. Participants with discrete submissions will have their submitted costs included.

Updated Participant Cost Estimation Approach - Option 1

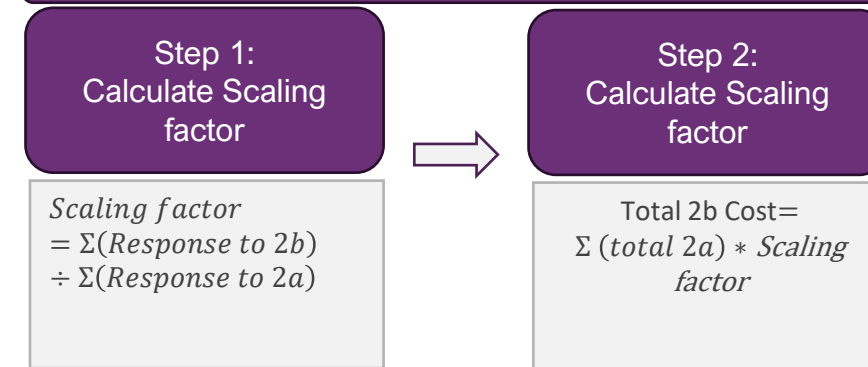
Option 1 Scaling Methodology

		Cost scaling	Assumption
IDAM	Tranche 0	20%	Industry Consultation for defining patterns and protocols. Agree on the transition strategy for MFA
	Tranche 1a	5%	User accounts enrolment for MFA
	Tranche 1b	0%	No new entitlement capabilities deployed
	Tranche 2a	0%	No advanced capabilities deployed
	Tranche 2b	0%	No decommission

IDX	Tranche 0a	20%	Industry Consultation for move to SFTP and OAuth Establish updates for data exchange capability such as implementing OAuth Provider, OAuth client capability and SFTP Pilot testing
	Tranche 0b		
	Tranche 1	40%	Move to SFTP and OAuth, regression and industry testing
	Tranche 2	40%	Move to SFTP and OAuth, regression and industry testing
	Tranche 3	0%	No change

PC	Tranche 0	15%	Security updates only
	Tranche 1	0%	No Portal movement
	Tranche 2	0%	No Portal movement

Option 2b Scaling Methodology



Assumptions

- Based on participant feedback and detailed option 1 scope related to implementing OAuth provider, there has been an increase in the IDX scaling factor for Tranche 0a and 0b
- Based on participant feedback, the increase in cost scaling for IDX Tranche 1 and Tranche 2 is due to participants identifying regression and bilateral industry testing as key activities.
- Option 1 broadly reflects implementation on the agreed effective change date, without the extended sunset approach of Option 2, reducing the opportunity to leverage market or internal changes.

Industry Implementation Cost Extrapolation*

This Business Case

	IDAM		IDX Foundation		PC	
	Option 1	Option 2a	Option 1	Option 2a/2b	Option 1	Option 2a
	Figures presented to nearest million, with a +/- 40% uncertainty range					
Industry Implementation Cost¹	\$2	\$38	n/a	~\$47	< \$1	\$13

This Business Case + DP2 Business Case -- Total Investment

	IDAM		IDX (Foundation + Transition)			PC	
	Option 1	Option 2a	Option 1	Option 2a	Option 2b	Option 1	Option 2a
	Figures presented to nearest million, with a +/- 40% uncertainty range						
Industry Implementation Cost	\$2	\$38	\$78	\$311	\$233	< \$1	\$13

Notes:

1. This Business case costs are associated with the implementation of the IDAM, IDX and PC initiatives. This Business case IDX costs are to establish the foundational capabilities and don't include the transition of the legacy services.

*Detailed calculations are in Appendix F

4.3 AEMO Operational Costs

Operational Cost Categories

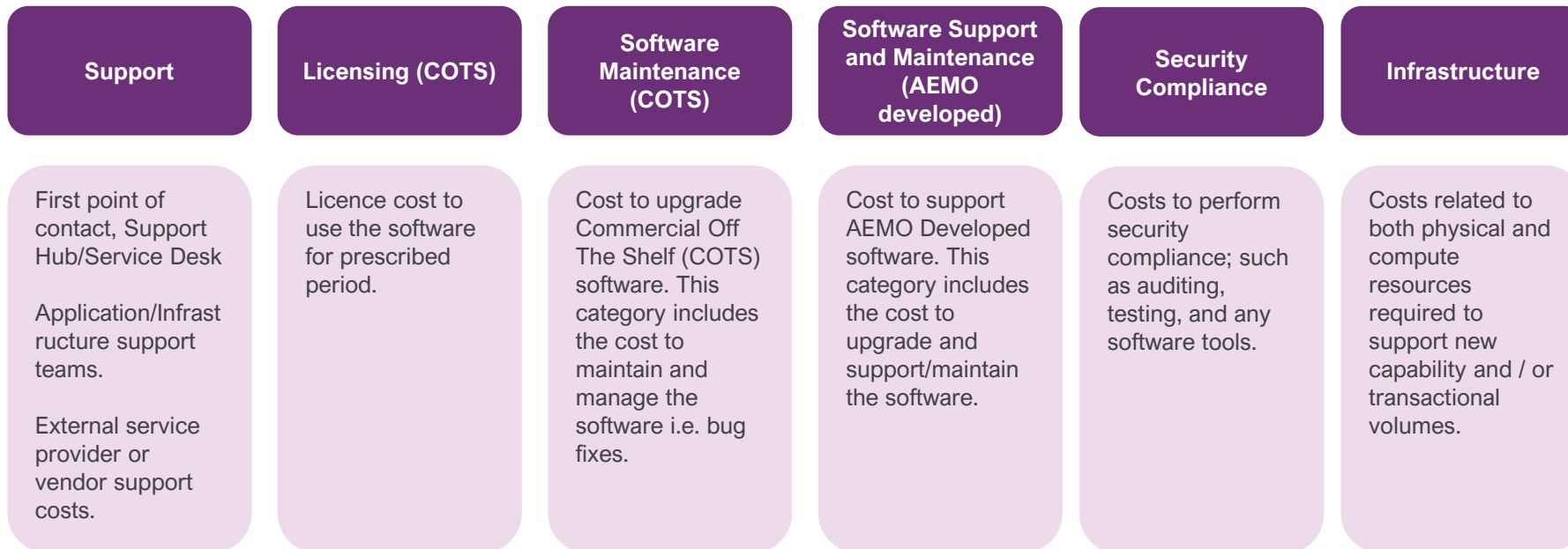
Operational Cost for This Business Case

Operational Cost for Foundation and Transition

AEMO Operational Costs Categories

The **AEMO Operational Costs** for the IDX, PC and IDAM initiatives are based on the agreed scope for Option 2. We completed a bottom-up estimate for each component and validated against (where available) comparable internal and international projects.

Scope of Operational estimate



AEMO Operational Costs: This Business Case



Total Operational Cost delta to support foundational capabilities: This Business Case

	IDAM		IDX (Foundation)			PC	
	Option 1	Option 2a	Option 1	Option 2a	Option 2b	Option 1	Option 2a
	Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range						
Foundational Total delta operating cost	\$2.3	\$7.3	n/a	n/a	n/a	\$0.9	\$1.6

Looking across the scope of this Business Case, operational costs have been forecast for the foundational investment phase:

- Portal Consolidation - similar operational costs required for Option 2a including its additional capabilities and internet-enabled portals, compared to the minimal cyber security uplift provided by Option 1.
- IDAM – Option 2a for IDAM introduces additional capabilities identified by the target state not provided under Option 1; costs include parallel operation prior to decommissioning of legacy capability.
- IDX – delta operational costs are net neutral for foundational capability, noting NEM Reforms leveraging the foundation will assess relevant volume drivers and associated costs for support.

Notes:

- Operational costs reflect the delta or change to existing operational costs for the provision of current market services
- IDAM, IDX Foundation and PC operational costs have been assessed over 7 years (2024-2030)
- In the process of developing this business case, market changes have been identified that will impact AEMO business as usual operational expenditure, e.g. an expected increase in participant numbers impacting hardware capacity requirements. These impacts are unrelated to this business case and so are not included here.

AEMO Operational Costs: This Business Case + DP2 Business Case



Total Operational Cost delta: This Business Case + DP2 Business Case (Foundation and Transition)

	IDAM		IDX			PC	
	Option 1	Option 2	Option 1	Option 2a	Option 2b	Option 1	Option 2
	Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range						
Foundational Total delta operating cost	\$2.3	\$7.3	n/a	n/a	n/a	\$0.9	\$1.6
Transitional Total delta operating cost	n/a	n/a	\$6.7	\$19.8	\$19.8	n/a	n/a

Looking out beyond this Business Case to include the DP2 Business Case, operational costs have been forecast to support transition of legacy services

- IDAM and PC delta costs are all taken up in the foundational investment phase
- IDX introduces operational cost deltas to support the transition of legacy services (Wholesale, Retail and Transmission)
- IDX Option 2a and 2b have equivalent delta cost impacts as they leverage the same technology platforms, deltas are driven by:
 - The progressive shift of transaction volumes applied to the new technology stack able to meet SOCI obligation and support target state capabilities
 - The requirement to continue to operate legacy services in parallel across the multi-year sunset period
- It is expected that the completion of foundation will further validate and identify opportunities to consolidate and or reduce operating cost deltas to support transition
- IDX Option 1 costs largely driven by the requirement for an MFT solution

Notes:

- Operational costs reflect the delta or change to existing operational costs for the provision of current market services
- IDAM and PC operational costs have been assessed over 7 years (2024-2030), while IDX has been assessed over 12 years covering the sunset period (2024-2035)
- Through discussions of this initiative, changes in the market have been identified that will impact AEMO opex costs, e.g. an expected increase in participant numbers. These impacts are unrelated to this business case and so are not included here.

4.4 Industry Operational Costs

Industry Operational Cost

Industry Operational Cost

- While opportunities for industry cost savings have been qualitatively identified and referenced under the industry pain points addressed by the target state, participants have been unable to quantify these opportunities across the three initiatives.
- Submissions on operational cost have not identified a delta resulting from the target state and have therefore been assessed as net neutral for this business case.
- Factoring these two elements above, it is reasonably expected that there will be an overall ongoing net cost reduction to the industry to operate the market and deliver future initiatives once the IDX, IDAM and Portal Consolidation foundation is in place.

4.5 Costs Impact on Upcoming Reforms

Cost impact on upcoming reforms

Cost Impact on upcoming Reforms

AEMO	IDAM Option 1	IDAM Option 2a	IDX Option 1	IDX Foundation	PC Option 1	PC Option 2a
	Figures presented to nearest million, with a +/- 40% uncertainty range					
Cost impact to support upcoming (DER, PQ Data) in absence of foundation ¹	\$3	\$0	\$7	\$0	n/a	n/a
Costs impact to future NEM reforms in absence of foundation ²	\$11	\$0	\$22	\$0	n/a	n/a

Notes:

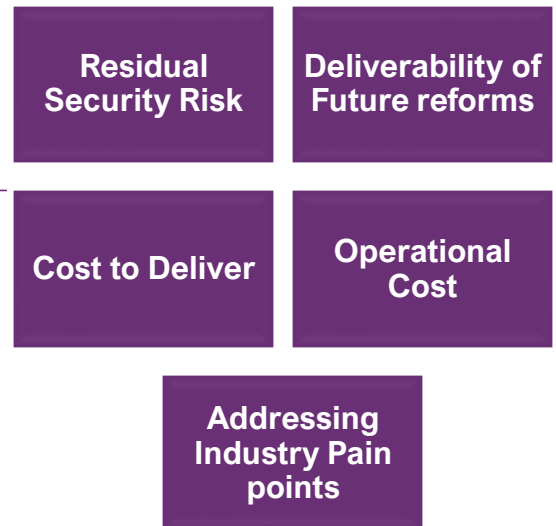
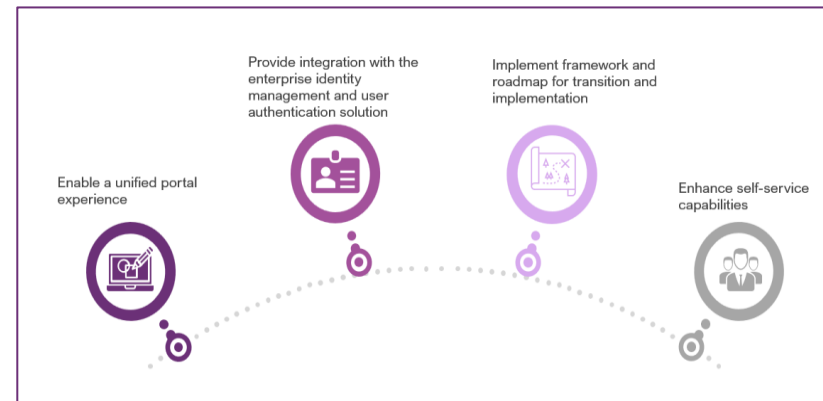
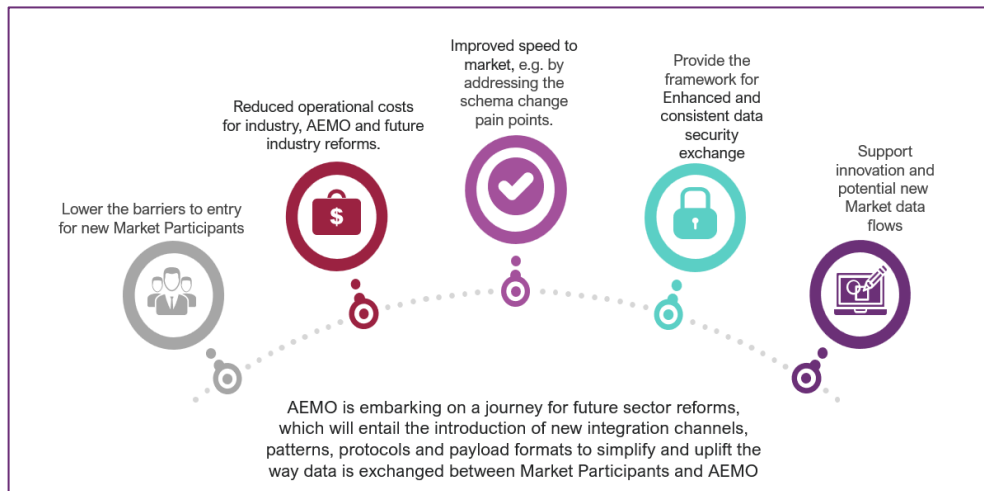
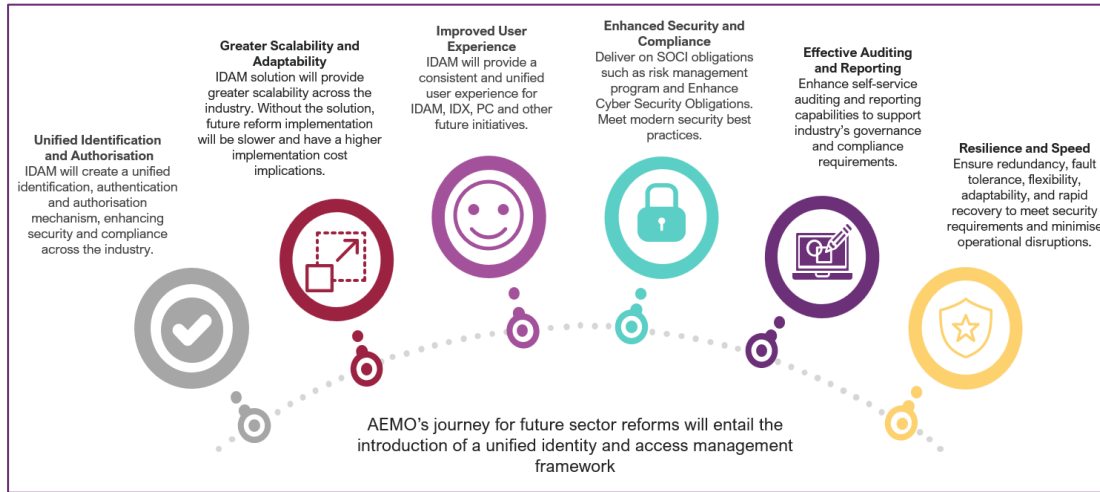
1. Whilst the cost of implementing DER Data Hub and PQ data (covered under Metering Services Review Package 3) are covered in those reforms, there is an assumption in those costs that foundational capability would be in place. This cost impact relates to the costs estimated in the event that foundational capability would not be in place.
2. The energy transition will require an increasing volume, diversity and frequency of data exchange between a wider cohort of energy stakeholders to sustain new market processes. Leveraging the estimated impacts for the upcoming reforms, we anticipate a cost impact on the future budgeted NEM program in the event that the foundational capability was not available, estimated at 10% for data exchange, and 5% for identity management.

5. Options Assessment

Option Assessment Framework
IDAM Options Assessment
IDX Options Assessment
PC Options Assessment
Recommendation

Assessment Categories

AEMO has defined the following categories for assessing the Business Case options. These categories have been defined in line with the Objectives defined and agreed with the Industry for IDAM, IDX and PC



Framework for Assessing Business Case Options

Assessment Categories	Description	Assessment Metric
Residual Security Risk	This category assesses the risk that remains in the landscape even after meeting all the minimum legislative security controls and compliance.	Maturity level <ul style="list-style-type: none"> Level 1 – Reactive and inconsistent Level 2 – Minimum capability addressing only fundamental requirements applied to technologies and processes Level 3 – Defined and Proactive: Align to strategic target state for the new business services only. Current services are not transitioned. Level 4 – Strategic, current NEM landscape transition with some legacy footprints: to optimise the cost-benefit realisation Level 5 - Strategic, current NEM landscape fully transitioned to target state: aligned to the needs of the future reforms
Deliverability of Future reforms	The energy transition is rapidly transforming the system and markets. This category assesses the speed, scalability and flexibility to implement future reforms as new markets mature and continue to change the energy landscape.	
Addressing Industry Pain points	This category evaluates for addressing industry pain points for ongoing operational cost, unifying data exchange mechanisms across markets, security controls, improved efficiency, system reliability and user experience.	
Cost to Deliver	Immediate implementation cost and cost to deliver future reforms	Immediate implementation cost : \$\$ value Cost to deliver future reforms <ul style="list-style-type: none"> Cost for confirmed initiatives: \$\$ value Cost for likely initiatives: % of total cost
Operational Cost	Ongoing operational cost for foundational and strategic initiatives.	Delta Operational Cost for new capabilities and legacy services

5.1 IDAM Options Assessment

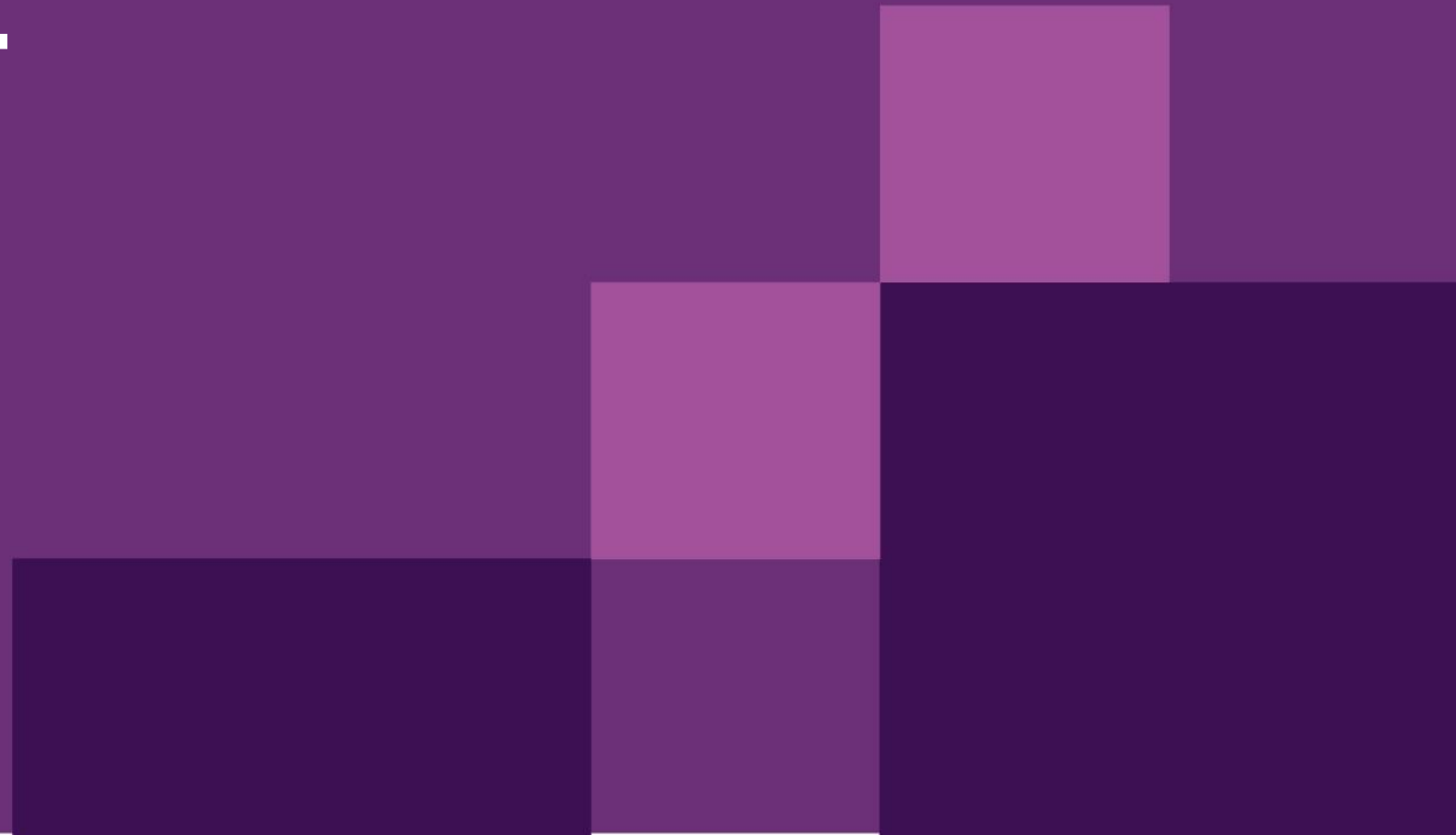
Residual Security Risk

Deliverability of Future Reforms

Industry Pain Points

Cost to Deliver

Operational Cost



IDAM - Residual Security Risk

Higher levels of integration across the value chain have increased the complexity of the overall security landscape, as well as the impact of a potential cyber-attack. It has been observed globally that there is an increasing impact if there is a security breach, and the possibility of breaches are increasing significantly.

While **all options will meet the minimum compliance requirements**, **Option 2a would have lower residual security risk than Option 1** owing to

- Enhanced security controls
- reduced attacked surface area by avoiding fragmented solutions

Description	Likelihood		Rationale	
	Option 1	Option 2a	Option 1	Option 2a
Enhanced Security Controls (e.g. Multi Factor Authentication (MFA), Context-based authentication)	2	5	<p>Legacy with limited security controls</p> <p>Option1 would retain legacy identity and access management systems which may still have vulnerabilities that can be exploited. However, controls will be implemented to mitigate the vulnerabilities that are required to meet the minimum legislative requirements</p>	<p>Designed to inherently follow security best practices</p> <p>Strategic target state architecture is designed to improve security posture by inherently following security best practices right from the design process, thus reducing vulnerabilities.</p>
Security - Attack surface area	1	5	<p>Wider attack surface area</p> <p>When there is a lack of foundation and standardised framework, it leads to a broader attack surface area and increases the risk of implementing security changes. With future initiatives implementing a siloed framework, the attack surface area becomes larger and larger as more initiatives are implemented.</p>	<p>Narrower attack surface area</p> <p>By avoiding fragmented solutions, the focus is on implementing component-based and industry-standard architecture; and integrated through reusable services.</p> <p>In Option 2a, we are keeping the attack surface narrow with a standardised framework and unified identity and entitlement management systems</p>

IDAM - Deliverability of Future Reforms

Deliverability of future reforms would be significantly improved with the availability of foundational frameworks (Option 2a) owing to reduced speed to market, providing more flexibility and being inherently secure by design.

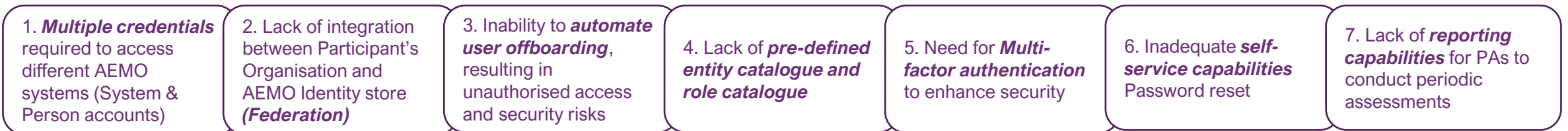
Description	Rating		Rationale	
	Option 1	Option 2a	Option 1	Option 2a
Speed to Market	2	5	<p>Uplift to legacy platforms</p> <p>Future reform programs may have localised implementation, with new identity and access management capabilities for new business services. This would lead to an increased design, build and testing time, thus slowing delivery.</p>	<p>Foundational capabilities available</p> <p>The standardised IDAM platform would provide foundational capabilities for new reform initiatives. It would reduce Industry consultation, design, build and testing time, thus expediting the implementation of new initiatives</p>
Flexibility and Innovation	2	5	<p>Uplift to legacy platforms</p> <p>New reform initiatives may need bespoke and disparate IDAM platforms to be implemented in silo to support evolving use cases. This would add to the list of disparate solutions, increase the complexity further and lead to duplicated investment</p>	<p>Availability of strategic foundation</p> <p>The availability of a strategic foundation facilitates flexible adaptation as the technical infrastructure supports capabilities that are required beyond 'day 1'. New initiatives can therefore leverage the strategic investment without a need to duplicate capabilities.</p>
Secure by design	2	5	<p>Uplift of legacy platforms</p> <p>Option 1 reflects a reactive rather than secure-by-design approach to meeting security requirements. The security measures and considerations will have to be retrofitted into the disparate systems, thus adding to the technical debt. This option tends to align to the principle of 'Secure by Risk Analysis'</p>	<p>Secured-by-Design in principle</p> <p>Option 2a would be "Secure by design" - security measures and considerations would be incorporated from the outset of the development process, making the system inherently secure, reducing the likelihood of vulnerabilities and minimizing the need for additional security patches or fixes later in the lifecycle.</p>

IDAM - Industry Pain Points

Option 1 would meet mandatory cyber requirements would not address any other industry pain point captured in consultation with the industry.
 Option 2a would address most of the industry pain points.

Rating		Rationale	
Option 1	Option 2a	Option 1	Option 2a
2	5	<ul style="list-style-type: none"> This option will not address most of the pain points captured in consultation with industry as it does not unify the disparate identity and access management systems Existing availability targets on current legacy platforms to remain, and the introduction of additional capabilities to meet MVP requirements. This will not improve system resilience and reliability, and the introduction of new initiatives and services will increase the risk of existing systems not meeting their availability targets without each initiative also investing in system uplifts. 	<p>This option addresses all pain points captured in consultation with industry:</p> <ul style="list-style-type: none"> Unifying the identity and entitlement management stores within the NEM and laying the foundation to extend this capability to other markets such as Gas and WEM through other market initiatives De-duplicating / consolidating the user accounts; providing the capability to use a single account to access business functions across multiple markets Enforce stricter authentication and authorisation process for person and system accounts using secured patterns Enhancing data sharing capabilities to provide advanced data sharing permissions Enhancing Participant Admin experience Providing advanced Identity & Entitlement Management Governance & Assurance Increased Resilience - Increased availability targets, and a hybrid Cloud/On-Prem services model, significantly mitigates the risk of outages and ensures reliable alternatives should there be failures. This reduces the risk of impact to the operation of the market, or lost opportunities.

Industry Key Pain Points



IDAM - AEMO Implementation Cost

While the Implementation cost of IDAM Option 2a is greater than that of Option 1, having a foundational framework proves to be beneficial in the long run. Building foundational capability in a strategic way builds capability that we know can be significantly leveraged in two upcoming reforms (DER Data Hub and Metering Services Framework Review), and that we can reasonably assume will be utilised in future reforms.

Immediate Implementation Cost

	Option 1	Option 2a
--	----------	-----------

Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range

AEMO Implementation Cost (+/- 40%)	\$4.2	\$20.8
------------------------------------	-------	--------

Cost to Deliver Future Reforms

	Option 1	Option 2a
--	----------	-----------

Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range

Cost impact to implement a subset of DER Data Hub and PQ Data that relate to identity management	\$3.0	\$0
--------------------------------------------------------------------------------------------------	-------	-----

Cost impact to deliver IDAM framework for likely initiatives* <i>(currently on the implementation roadmap)</i>	\$11.0	\$0
-------------------------------------------------------------------------------------------------------------------	--------	-----

Option 1

Additional Cost

Cost to deliver new initiatives under Option 1 would be significantly higher as future reforms would not have foundational capabilities to leverage, these initiatives will require its own identity and access management capabilities. This results in a cost impact for Option 1.

Additional Cost

Cost to deliver new initiatives under Option 1 would be significantly higher as future reforms would not have foundational capabilities to leverage, initiatives will require their own identity and access management capabilities. This results in a cost impact for Option 1.

Option 2a

No Additional Cost

Building foundational capability in a strategic way builds capability that we know can be significantly leveraged in two upcoming reforms (DER Data Hub and MSFR), make the cost to deliver Identity and Access management capabilities practically 0.

No Additional Cost

Building foundational capability in a strategic way builds capability that we can reasonably assume will be utilised in future reforms making the cost to deliver Identity and Access management capabilities practically 0.

Note:

*The energy transition will require an increasing volume, diversity and frequency of data exchange between a wider cohort of energy stakeholders to sustain new market processes. On this basis we consider that 5% of the costs of future budgeted NEM2025 program (~\$220M) would relate to identity management.

Option 1 investment will further be required to be replicated across other energy markets at additional cost, where Option 2 provides an extensible framework to support those markets

IDAM - AEMO Operational Cost

IDAM provides ongoing additional benefits over legacy system, and the foundation and new capabilities built will provide ongoing value compared to Option 1. Additional saving will be possible once other markets transition from their legacy to the IDAM solution.

Operational Cost				
	Option 1	Option 2a		
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range				
AEMO Operational Cost (+/- 40%)	\$2.3	\$7.3		
Future View			Option 1	Option 2a
	Option 1	Option 2a		
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range				
Cost impact of supporting legacy services	\$1.5	\$2.0	<ul style="list-style-type: none"> - Additional cost to support MFA for all participants, without the option for participants to federate and be able to manage their own identities. - Legacy identity solution for market systems remains in place - Ongoing costs for future initiatives around consultation, design and build of Identity and Access management solutions. 	<ul style="list-style-type: none"> - Legacy systems incur ongoing costs during progressive migration + Project savings with IDX Target State in place for future initiatives
Steady state (Annual)	\$0.5	\$1.3	As per Option 1	<ul style="list-style-type: none"> - New Identity Management System introduces additional running costs + Decommission of legacy identity systems reduced costs and security exposure + Project savings with IDX Target State in place for future initiatives
Cost impact of annual schema changes	N/A			

5.2 IDX Options Assessment

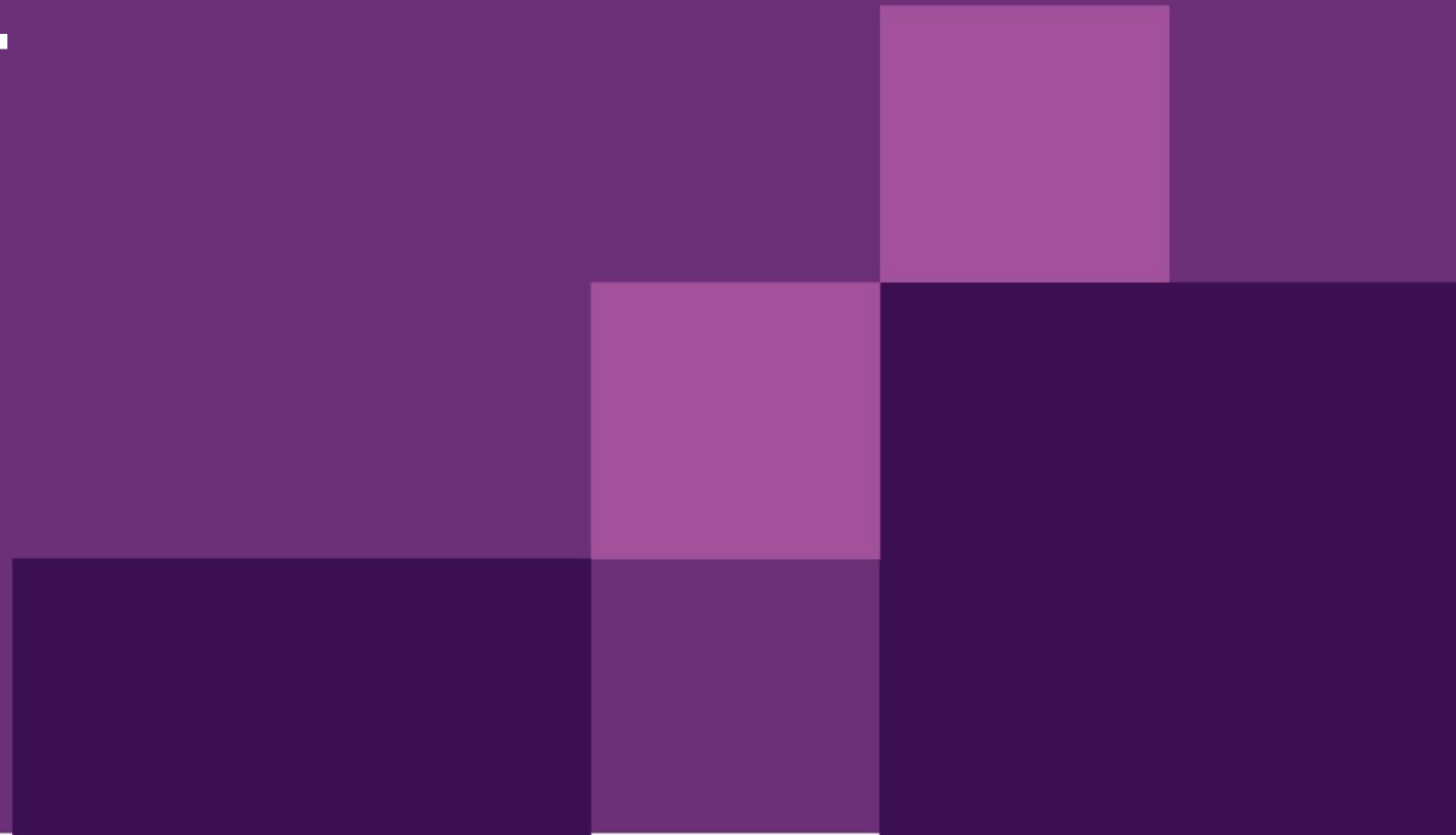
Residual Security Risk

Deliverability of Future Reforms

Industry Pain Points

Cost to Deliver

Operational Cost



IDX - Residual Security Risk

Higher levels of integration across the value chain have increased the complexity of the overall security landscape, as well as the impact of a potential cyber-attack. It has been observed globally that there is an increasing impact if there is a security breach, and the possibility of breaches are increasing significantly.

While **all options will meet the minimum compliance requirements, Option 2a and 2b would have lower residual security risk than Option 1** owing to

- the use of new channels and protocols that align with best cybersecurity practices
- the reduced attacked surface area by avoiding fragmented solutions

#	Risk Description	Rating		
		Option 1	Option 2a	Option 2b
1	Security – Channels and Protocols	2	5	5
2	Security - Attack surface area	2	5	5

Rationale behind rating		
Option 1	Option 2a	Option 2b
<p>Multiple patterns ad protocols</p> <p>Participants and AEMO will still have to navigate multiple authentication processes (different authentication pattern for each channel), integration patterns and protocols, all of which come with associated costs and complexities.</p>	<p>Unified standardised channels and protocols following cybersecurity best practices and compliance</p> <p>Unified channels and protocols defined in Options 2a and 2b would adhere to the cybersecurity obligations & best practices</p>	
<p>Wider attack surface area</p> <p>When there is a lack of foundation & standardised framework and the integration systems for different markets are not unified, it leads to a broader attack surface area and increases the risk of implementing security changes. With future initiatives implementing siloed solutions, the attack surface area becomes larger and larger as more initiatives are implemented.</p>	<p>Narrow attack surface area</p> <p>By avoiding fragmented solutions, the focus is on implementing unified component-based and industry-standard architecture; and integrated through reusable interfaces.</p> <p>In Option 2a and 2b, we are keeping the attack surface narrow with unified systems and a standardised framework</p>	

IDX - Deliverability of Future Reforms

Deliverability of future reforms would be significantly improved with the availability of foundational frameworks (Option 2a and Option 2b) owing to reduced speed to market, providing more flexibility and being inherently secure by design covering introduction of new business functions and enhancing the current business functions. Option 2b is a little less flexible than Option 2a due to the complexity associated with aseXML and hence the speed to market would be relatively lower.

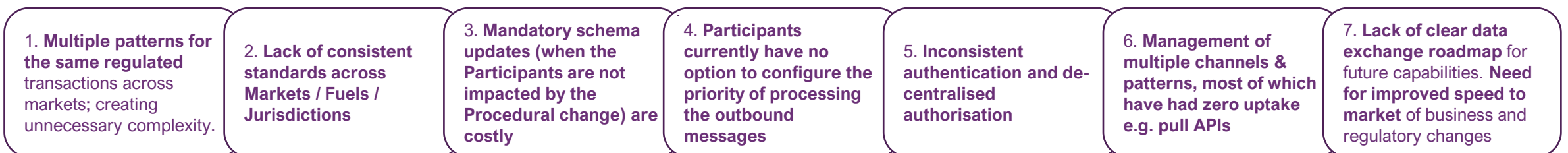
#	Description	Rating			Rationale behind rating		
		Option 1	Option 2a	Option 2b	Option 1	Option 2a	Option 2b
1	Speed to Market	1	5	4	<p>Uplift to legacy platforms</p> <p>Future reform programs will be implemented locally, with new channels and protocols for new business services. This would lead to an increased industry consultation, implementing siloed solutions, design, build and testing time, thus slowing delivery</p>	<p>Foundation capabilities available</p> <p>The standardised platform with pre-defined channels and protocols would provide foundational capabilities for new reform initiatives. It would reduce Industry consultation, design, build and testing time, thus expediting the implementation of new services</p>	<p>Foundation available, retained legacy payloads</p> <p><u>For new business services:</u> Like Option 2a, new business functions will leverage the target patterns, standards and payload formats. <u>For existing services:</u> speed to market would be more than that of Option 2a due to the aseXML pain points captured in discovery workshops</p>
2	Flexibility and Innovation	1	5	4	<p>Uplift to legacy platforms</p> <p>Will enable the minimum capabilities required. Future reforms would require uplifting the systems in silo requiring duplicated efforts and could also pose risks that current systems are not prepared to meet the rapid transformation & innovation.</p>	<p>Availability of a strategic foundation</p> <p>The availability of a strategic foundation facilitates flexible adaptation as the technical infrastructure supports capabilities that are required beyond 'day 1'. This limits duplicated investments and efficient delivery of reforms to adapt to future</p>	<p>Availability of a strategic , retained legacy payloads foundation</p> <p>Similar to option 2a but Option 2b is a little less flexible due to the complexity associated with retaining and extending the existing business services on legacy payloads such as aseXML</p>
3	Secure by design	2	5	5	<p>Uplift of legacy platforms</p> <p>Reflects a reactive rather than secure-by-design approach to meet security requirements. The security measures and considerations will have to be retrofitted into disparate systems, thus adding to the technical debt. This option tends to align to the principle of 'Secure by Risk Analysis'</p>	<p>Secured-by-Design in principle</p> <p>Options 2a and 2b would be "Secure by design" - security measures and considerations would be incorporated from the outset of the development process, making the system inherently secure, reducing the likelihood of vulnerabilities and minimizing the need for additional security patches or fixes later in the lifecycle.</p>	

IDX – Industry Pain Points

Option 1 would meet minimum cyber requirements but would not address majority of industry pain points captured in consultation with the industry.
 Option 2a would address most of the industry pain points.
 Option 2b will address majority of the industry pain points but the pain points related to payload (e.g. aseXML) for the existing interfaces will not be addressed in this option

Rating			Rationale		
Option 1	Option 2a	Option 2b	Option 1	Option 2a	Option 2b
1	5	4	<ul style="list-style-type: none"> This option won't address most industry pain points, as it doesn't standardise data exchange channels, protocols, and payload formats. Existing availability targets on current legacy platforms to remain, and the introduction of additional capabilities to meet MVP requirements. This will not improve system resilience and reliability, and the introduction of new initiatives and services will increase the risk of existing systems not meeting their availability targets without each initiative also investing in system uplifts. 	<p>This option will address most of the pain points captured in consultation with industry. Key highlights of the solution are:</p> <ul style="list-style-type: none"> AEMO data exchange software will be enhanced to provide data exchange mechanisms that are defined in the target state architecture; thereby providing a reusable gateway software across multiple Participants Current state NEM interfaces would be transitioned to the target state. NEM Retail & Wholesale payload formats for the existing interfaces align to the target state payload standards Increased Resilience: Increased availability targets, and a hybrid Cloud/On-Prem services model, significantly mitigates the risk of outages and ensures reliable alternatives should there be failures 	<p>Same as option 2a except the payload pain points (in specific aseXML) for the existing interfaces will not be addressed in this option.</p> <ul style="list-style-type: none"> Increased Resilience: Same as Option 2a

Industry Key Pain Points



IDX – AEMO Implementation Cost

While the AEMO Implementation cost of IDX Option 2a and 2b is greater for than that of Option 1, having a foundational framework proves to be beneficial in the long run. Building foundational capability in a strategic way builds capability that we know can be significantly leveraged in two upcoming reforms (DER Data Hub and Metering Services Framework Review), and that we can reasonably assume will be utilised in future reforms.

Immediate Implementation Cost			
	Option 1	Option 2a	Option 2b
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range			
AEMO Implementation Cost (+/- 40%)	\$9.8	\$51.2	\$42.4
Cost to Deliver Future Reforms			
	Option 1	Option 2a	Option 2b
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range			
Cost impact to implement a subset of DER Data Hub and PQ Data that relate to data exchange	\$7.0	\$0	\$0
Cost impact to deliver data exchange framework for likely initiative* <i>(currently on the implementation roadmap)</i>	\$22.0	\$0	\$0

Rationale		
Option 1	Option 2a	Option 2b
Additional Cost Cost to deliver new initiatives under Option 1 would be significantly higher. Future reforms would not have foundational capabilities to leverage on and every new initiative will implement their own patterns, channels, protocols We have chosen to represent these as costs for Option 1, rather than a saving for Option 2.	No Additional Cost Building foundational capability in a strategic way builds capability that we know can be significantly leveraged in two upcoming reforms (DER Data Hub and MSFR), make the cost to deliver data exchange framework practically 0.	No Additional Cost Same as Option 2a
Additional Cost Cost to deliver new initiatives under Option 1 would be significantly higher. Future reforms would not have foundational capabilities to leverage on and every new initiative will implement their own patterns, channels, methodologies.	No Additional Cost Building foundational capability in a strategic way builds capability that we can reasonably assume will be utilised in future reforms making the cost to deliver data exchange framework practically 0.	No Additional Cost Building foundational capability in a strategic way builds capability that we can reasonably assume will be utilised in future reforms making the cost to deliver data exchange framework practically 0.

*The energy transition will require an increasing volume, diversity and frequency of data exchange between a wider cohort of energy stakeholders to sustain new market processes. On this basis we consider that 10% of the costs of future budgeted NEM2025 program (~\$220M) would relate to data exchange

IDX – AEMO Operational Cost

Additional capabilities introduced by IDX and the foundation built will provide ongoing savings compared to Option 1.

Operational Cost						
	Foundation (This Business Case)			Transition (DP2 Business Case)		
	Option 1	Option 2a	Option 2b	Option 1	Option 2a	Option 2b
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range						
AEMO Operational Cost (+/- 40%)	N/A	N/A	N/A	\$6.7	\$19.8	\$19.8

AEMO Operational Cost				Rationale		
	Option 1	Option 2a	Option 2b	Option 1	Option 2a	Option 2b
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range						
Cost impact of supporting legacy services	\$6.1	\$3.4	\$3.4	<ul style="list-style-type: none"> - Additional costs for MFT solution to replace existing FTP channel - Continued costs for future initiatives around consultation, design and build of data exchange solutions 	<ul style="list-style-type: none"> - Additional operational costs from supporting both the IDX Target State and Legacy data exchange systems. 	As per Option 2a
Steady state (Annual)	\$0.6	\$2.1	\$2.1	<ul style="list-style-type: none"> - Legacy systems remain with added complexity + Lower cost than Option 2 	<ul style="list-style-type: none"> + Decommission of legacy systems post sunset + Project savings with IDX Target State in place for future initiatives 	As per Option 2a
Cost impact of annual schema changes	No saving	\$0.1 (saving)	No saving	<ul style="list-style-type: none"> - Continued costs to maintain legacy schema and payloads 	<ul style="list-style-type: none"> + Saving from the decommissioning of legacy payloads 	<ul style="list-style-type: none"> - Continued costs to maintain legacy schema and payloads

5.3 Portal Consolidation Options Assessment

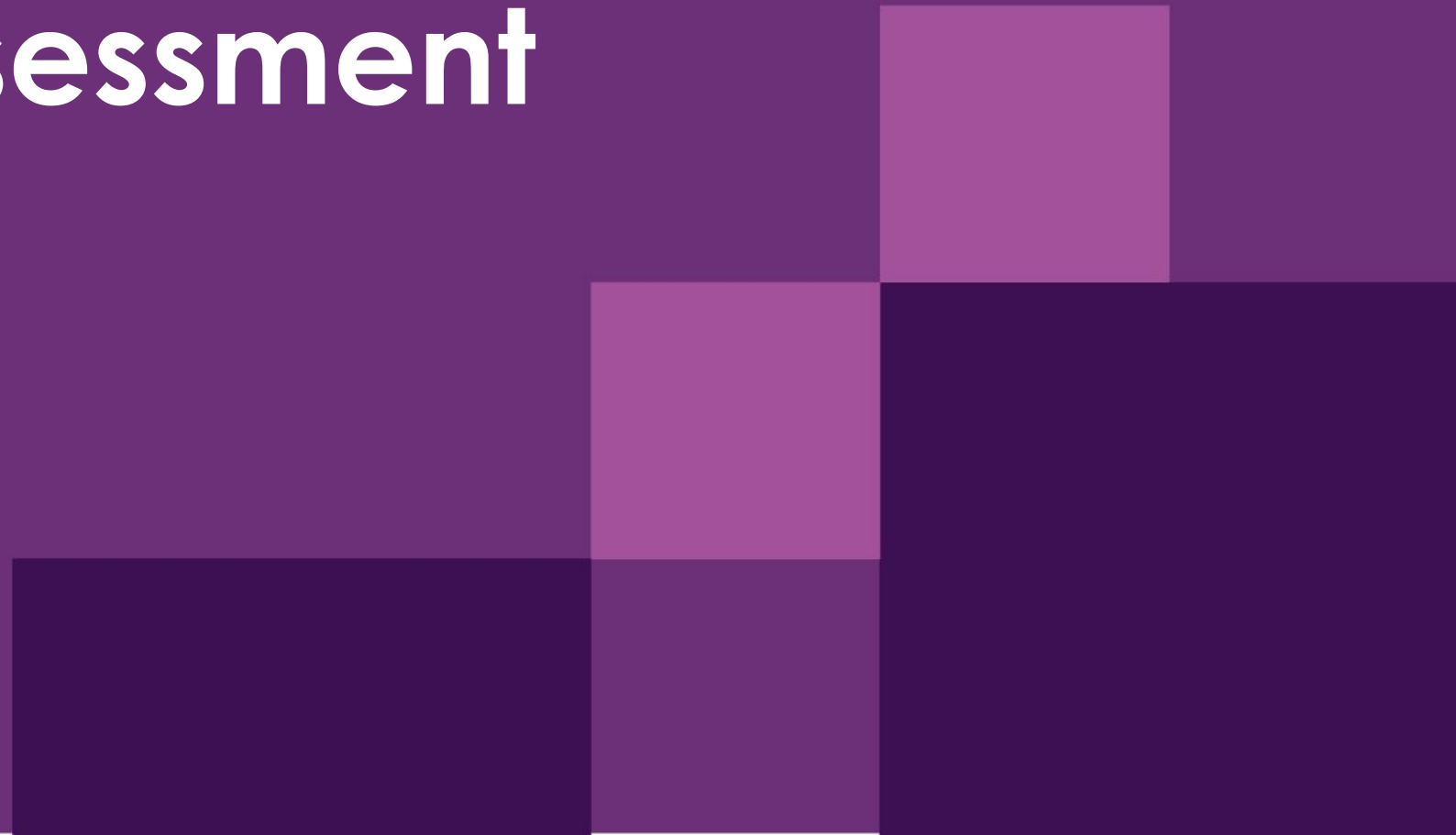
Residual Security Risk

Deliverability of Future Reforms

Industry Pain Points

Cost to Deliver

Operational Cost



PC - Residual Security Risk

Higher levels of integration across the value chain have increased the complexity of the overall security landscape, as well as the impact of a potential cyber-attack. It has been observed globally that there is an increasing impact if there is a security breach, and the possibility of breaches are increasing significantly.

While **all options will meet the minimum compliance requirements**, **Option 2a would have lower residual security risk than Option 1** owing to

- the adoption of Zero Trust principle
- Increased cyber resilience of browser services

Description	Likelihood		Rationale	
	Option 1	Option 2	Option 1	Option 2
Zero Trust	2	5	<p>Tactical Uplift Option 1 would tactically uplift existing browser services only to integrate with IDAM to address legislative security requirements.</p>	<p>Adopt Principle of Zero Trust Option 2 would adopt the principle of Zero Trust, requiring users to be authenticated, authorized, and continuously validated for security configuration and posture before being granted or keeping access to applications and data.</p>
Cyber Resilience of exposed end points	2	5	<p>Mandatory security requirements only Option 1 would enhance existing browser services to integrate with IDAM, but no other security improvements would be made</p>	<p>Increased Cyber Resilience Option 2 would further tighten security by aligning all portal-based interactions with IDX API standards</p>

PC - Deliverability of Future Reforms

Deliverability of future reforms would be improved with the availability of foundational frameworks (Option 2a) owing to reduced 'speed to market', providing more flexibility and being inherently secure by design.

Description	Rating		Rationale	
	Option 1	Option 2	Option 1	Option 2a
Speed to Market	2	5	<p>Uplift to legacy platforms New browser applications may be either delivered as a new and independent URL or incorporated into one the legacy portals where possible.</p>	<p>Availability of strategic foundation New browser applications can be delivered into the target state portal framework and inherit all the standards and useability features embedded in the target state portal framework.</p>
Flexibility and Innovation	2	5	<p>Uplift to legacy platforms New browser applications may be constrained by the technology base of existing legacy portals in terms of their ability to introduce new technical capability</p>	<p>Availability of strategic foundation New browser applications can leverage modern technical web application stacks which are supported by the target state portal framework</p>
Secure by design	2	5	<p>Uplift to legacy platforms New browser applications delivered as a new and independent URL will need to re-implement all the best practice security controls.</p>	<p>Availability of strategic foundation New browser applications can be delivered into the target state portal framework and inherit all the security features embedded in the target state portal.</p>

Portal Consolidation - Industry Pain Points

Option 1 would meet mandatory cyber requirements would not address any other industry pain point captured in consultation with the industry.
 Option 2a would address most of the industry pain points.

Rating		Rationale	
Option 1	Option 2a	Option 1	Option 2a
2	5	<ul style="list-style-type: none"> This option will not address most of the pain points captured in consultation with industry Existing availability targets on current legacy platforms to remain, and the introduction of additional capabilities to meet MVP requirements. This will not improve system resilience and reliability, and the introduction of new initiatives and services will increase the risk of existing systems not meeting their availability targets without each initiative also investing in system uplifts. 	<p>This option will Addresses most of the pain points captured in consultation with industry:</p> <ul style="list-style-type: none"> Enables a single pane of glass; providing a pathway for future unification across fuels and markets Implements the capabilities defined in target state architecture e.g. self-serve capabilities, personalised features Enables browser services to be accessible via internet Single identity for various browser services/web apps Unifies the user experience Enhanced user documentation Addresses most of the pain points captured in consultation with industry. Increased Resilience: Increased availability targets, and a hybrid Cloud/On-Prem services model, significantly mitigates the risk of outages and ensures reliable alternatives should there be failures. This reduces the risk of impact to the operation of the market, or lost opportunities.

Industry Key Pain Points



PC - AEMO Implementation Cost

While the AEMO Implementation cost of PC Option 2a is greater for than that of Option 1, having a foundational framework proves to be beneficial in the long run.

Immediate Implementation Cost		
	Option 1	Option 2a
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range		
AEMO Implementation Cost (+/- 40%)	\$0.5	\$6.2

Cost to Deliver Future Reforms		
	Option 1	Option 2a
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range		
Cost impact to implement a subset of DER Data Hub and PQ Data that relate to identity management	N/A	N/A
Cost impact to deliver IDAM framework for likely initiatives* <i>(currently on the implementation roadmap)</i>	N/A	N/A

Rationale	
Option 1 and Option 2a	
<p>No cost impact on upcoming reforms has been identified with the building of a foundational framework for portals.</p> <p>However, as described in an earlier slide, the deliverability of future reforms would be improved with the availability of foundational frameworks owing to reduced 'speed to market', providing more flexibility and being inherently secure by design</p>	

PC - AEMO Operational Cost

Portal Consolidation provides a unified portal for participants and users, delivering an uplifted framework for current and future market portals that is more secure. The enablement of internet access to portals will also lower the barrier of entry for participants to use those portals.

Operational Cost			Rationale	
	Option 1	Option 2a	Option 1	Option 2a
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range				
AEMO Operational Cost (+/- 40%)	\$0.9	\$1.6		
Future View			Rationale	
	Option 1	Option 2a	Option 1	Option 2a
Figures presented in millions, to nearest \$100K, with a +/- 40% uncertainty range				
Cost impact of supporting legacy services	\$0.9	\$1.0	- Increased support and maintenance costs for the cybersecurity uplifted portal framework	- Increased costs to support and maintain new portal framework and the web enabled portals
Steady state (Annual)	\$0.15	\$0.25	- No additional capabilities delivered	+ Unified NEM Market portals and framework enabling a single pane for participants and portals users. + The internet enablement of Portals allows for a lower barrier of entry for smaller participants.
Cost impact of annual schema changes	N/A			

6. Recommendation

Full Investment Assessment Summary

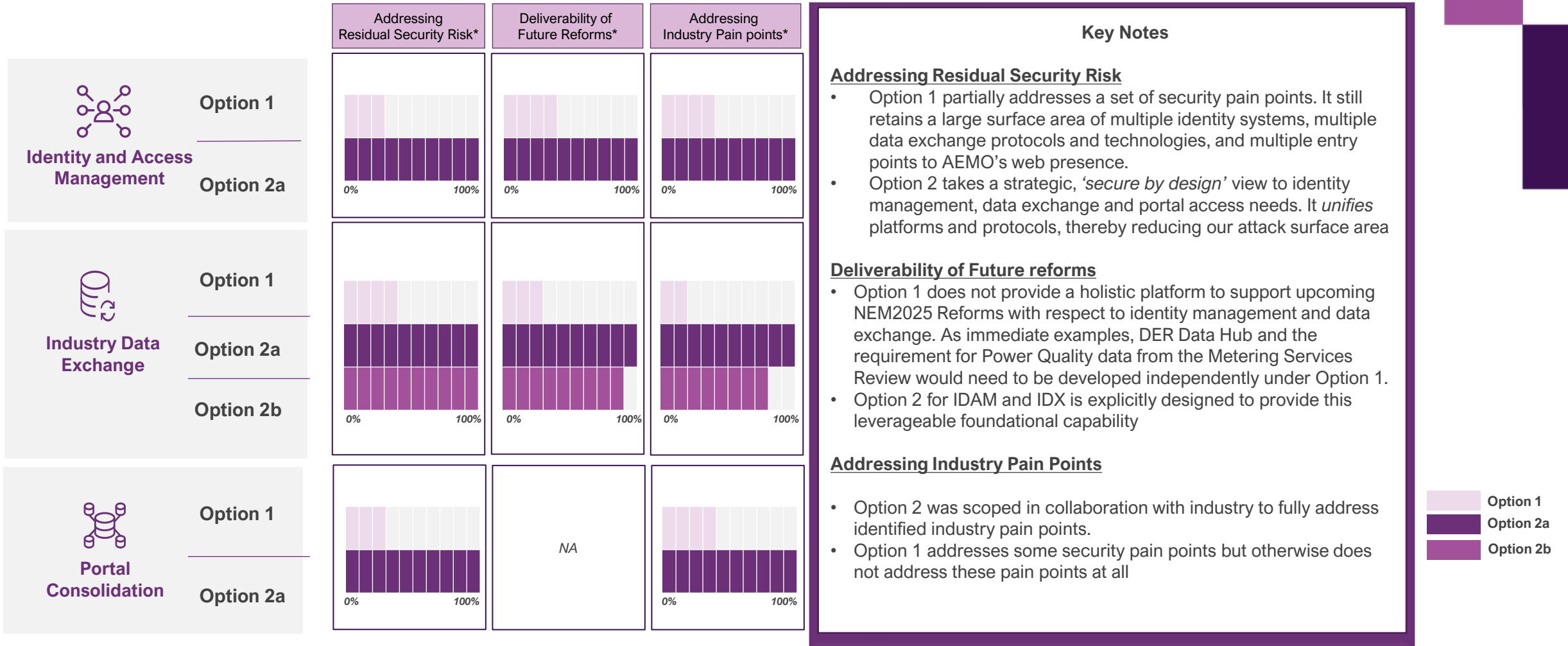
Recommendation

Upcoming Reforms – Leveraging Synergies

Assessing Options against key drivers

AEMO has conducted a high-level assessment of options using five categories to determine the potential benefits of these initiatives. The assessment included both qualitative and quantitative measures and considered the direct implementation costs to AEMO, its operational costs, and the cost impact due to the absence of a foundational phase in the upcoming reforms.

AEMO assesses that **Option 2 is superior to Option 1** in (i) addressing security requirements, (ii) enabling future reforms to be delivered and (iii) addressing identified industry pain points.



*Percentages are derived from individual option ratings in relation to the overall score – please refer to 'option assessment' section for more details

Recommendation Summary

Compelling drivers exist to develop new foundational capability across IDAM, IDX and PC areas. Given short term reform roadmap congestion & need for fiscal prudence, *AEMO recommends a phased investment approach for IDX* to address critical security needs, support near-term NEM reforms, provide flexibility for the future & address priority industry pain points.

RECOMMENDATION

RATIONALE



Identity and Access Management

PROCEED with a Strategic target state, AEMO investment of **\$21M¹** over 2 years

- Address key security vulnerabilities and reduce attack surface area – identity management is the most impactful “weak link” in the cyber security chain
- Manage expected increase in identities for management: DERs, small generators
- AEMO TCO cost differential of **\$8M** & total Industry costs of **\$38M** are smaller than the potential cost and customer impact of security breaches



Industry Data Exchange

PROCEED with a Strategic target state Foundation phase, AEMO investment of **\$20M** over 2 years

- As the grid becomes digitised, data exchanged is increasing in volume, frequency and requires lower latency
- IDX Foundation phase represents an efficient and unified implementation of data exchange capabilities across multiple reforms requiring it (AEMO costs are **\$20M** compared to **\$29M** if done initiative by initiative, and participants also see a cost efficiency)
- Migrating legacy services is difficult to assess at this stage given the cost uncertainty and value uncertainty. Deferring the decision point on migrating legacy services – IDX Transition phase – allows for more certainty on cost and value estimates and more information to guide optimising the transition approach.



Portal Consolidation

PROCEED with a strategic target state, AEMO investment of **\$6M** over 2 years

- Portal Consolidation Strategic target state delivers benefits to address identified industry pain points for a TCO cost differential of **\$6M** for AEMO and **\$13M** for industry
- Reduces AEMO’s attack surface area in the most common ‘entry point’ for bad actors

1. All financial figures presented on this slide have a +/- of 40%

Upcoming Reforms –Leveraging Synergies

What is the cost to industry to implement Metering Services Review (Package 3), and DER data hub, if IDX is in place, compared to IDX **not** being in place?

DER Data Hub

- IDX Target State platform delivers industry-agreed integration patterns, protocols and payload standards. The base platform will be built taking in the needs of the current environment and future reforms that also include the requirements of the DER Data Hub
- DER Data Hub will leverage the base platform, standards, channels, patterns, guard-rails, payload formats, decision tree etc to develop the business services without the need to build new target state capabilities
- DER Data Hub will also leverage the target state Identity and Access Management solution, target state authentication and authorisation mechanisms, advanced data sharing capabilities and advanced security features; aligning with the requirements of legislative compliance. The project is not required to build new IDAM capabilities
- DER Data Hub User Interface will be built on the enhanced portal framework that can be internet-enabled and leverage the framework and patterns defined by the Portal Consolidation Target state

*With the above key considerations, the DER Data Hub project will be able to leverage all the base capabilities and patterns that IDX, IDAM and PC define, thereby adding the costs required to build/uplift the required infrastructure, run industry consultations and define the deployable patterns under **option 1***

Basic PQ Data – Review of the regulatory framework for metering services

The following critical considerations are needed for the exchange of basic PQ data

- Considering the volumes, frequency and size of the PQ data that needs to be exchanged; it requires an uplift to the data exchange platform that will be addressed in the IDX Foundational phase; meeting the requirements of the PQ data exchange
- Enhanced capacity and threshold management framework to manage the additional volumes that will be introduced by PQ data exchange.
- Enhanced stop file processing will be implemented in the IDX Foundational phase that is required to manage the exchange of non-critical data over the critical B2B transactions. The metering Services Framework project will be able to leverage this process to efficiently exchange PQ data without impacting the exchange of other critical B2B transactions such as Service Orders

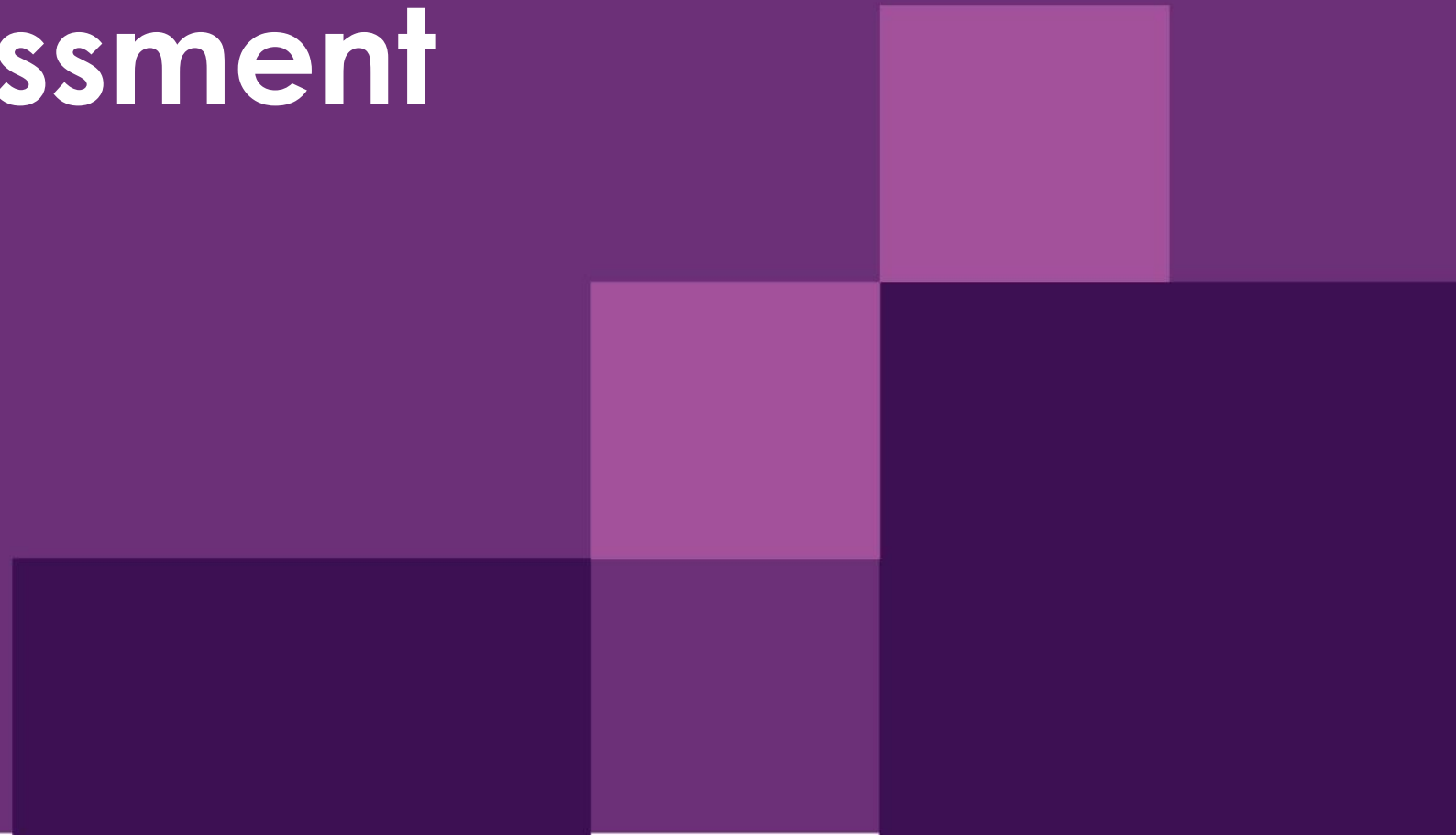
IDX Foundational components reduce a significant cost profile associated with the implementation of Basic PQ data in Legacy IDX. We estimate additional cost for the actual change implementation under option 1 due to IDX Foundation being unavailable.

Key considerations

- Leveraging synergies to the foundational capabilities will help reduce duplication of delivery effort, avoiding the need for system changes to first implement these initiatives and reforms onto legacy systems and then to upgrade and migrate to new systems later.
- This also minimises disruption to industry and supports a more structured approach to balancing delivery and investments for the rapid energy transition.

7. Risk Assessment

Risk Assessment



Risk Assessment

Risk assessment analysis focuses on the risks on transition and achieving the strategic target state

Risk #	Risk Description	Rating (Option 0)	Potential Mitigants (Option 1 and Option 2)	Residual Risk Rating (Option 1)	Residual Risk Rating (Option 2)
1	<p>If foundational capabilities for IDX/IDAM/PC are not established before embarking on subsequent and other future reforms:</p> <p>Impact</p> <ul style="list-style-type: none"> New market services proposed by NEM Reform Program, and subsequent program may be compromised due to lack of identified fit-for-purpose capability. 	High Impact	<p>Option 1:</p> <ul style="list-style-type: none"> Option 1 wouldn't provide any upfront foundational capabilities. This option will follow a reactive approach where upcoming reforms will have localised implementation. <p>Option 2:</p> <ul style="list-style-type: none"> AEMO will implement foundational capabilities to support future reforms for a faster and more flexible adaptation as the market matures and the energy landscape changes. The timeline of the implementation of these foundational capabilities underpinning v3 NEM Reform Implementation program. This allows participants to plan and manage their investment and roadmap for the energy transition AEMO ensure the rationale for a target state is fully considered to balance implementation cost against whole-of-life costs, benefits and security considerations 	High Impact	Medium Impact
2	<p>If AEMO and Industry systems are not ready to meet SOCI compliance and do not follow cybersecurity best practices:</p> <p>Impact</p> <ul style="list-style-type: none"> Existing services have been identified to have known vulnerabilities and lack support for modern authentication and authorisation requirements, which are needed to comply with AESCSF SP1 requirements, which in turn is required to meet new industry obligations introduced under the SOCI Act 	Critical Impact	<p>Option 1:</p> <ul style="list-style-type: none"> AEMO uplifts existing NEM platforms to meet the minimum cybersecurity legislative requirements. Option 1 reflects a reactive rather than secure-by-design Additional work will be required to identify an alternate approach to SOCI compliance for existing services and across other energy markets <p>Option 2:</p> <ul style="list-style-type: none"> The strategic target state architecture is underpinned by the secure-by-design principle to improve security posture by inherently following security best practices right from the design process, thus reducing vulnerabilities 	Medium Impact	Medium Impact
3	<p>If upcoming reforms add extra scope</p> <p>Impact</p> <ul style="list-style-type: none"> Changes to policy and rules, scope and design for the upcoming reforms will impact IDAM/IDX/PC, resulting in increasing scope uncertainty and/or cost 	High Impact	<p>Option 1:</p> <ul style="list-style-type: none"> AEMO will enable a focus on building components that are required 'Day 1' and are less likely to be stranded. This option has a lower need to make a guess on the upcoming scope of the reforms <p>Option 2:</p> <ul style="list-style-type: none"> Implement strategic foundational target state architecture that supports scalability and facilitates faster and more flexible adaption as the energy market undergoes a rapid transformation. 	High Impact	Medium Impact

Low Impact
Medium Impact
High Impact
Critical Impact

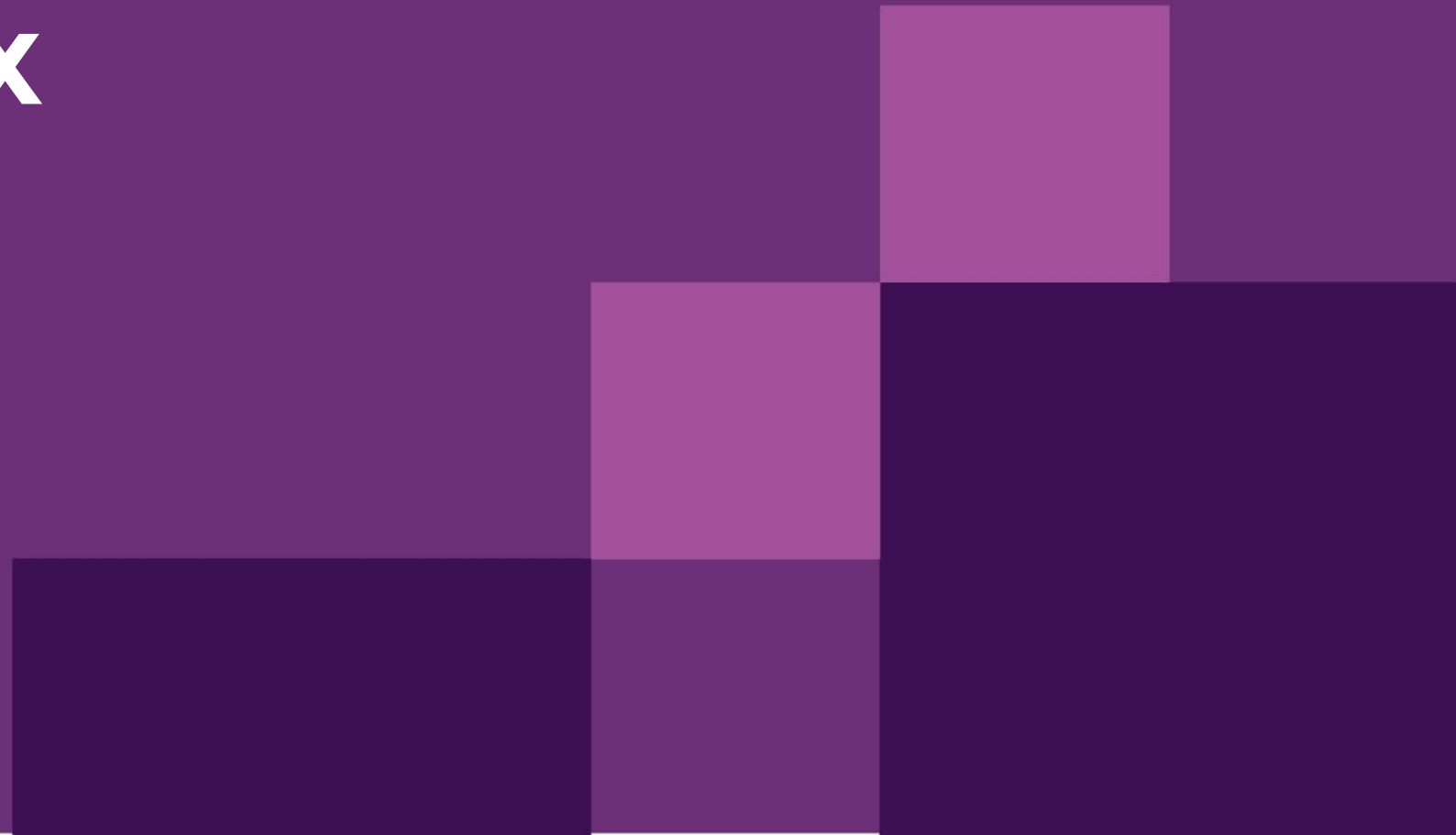
Risk Assessment

Risk assessment analysis focuses on the risks on transition and achieving the strategic target state

Risk #	Risk Description	Rating (Option 0)	Potential Mitigants (Option 1 and Option 2)	Residual Risk Rating (Option 1)	Residual Risk Rating (Option 2)
4	<p>If Upcoming reforms do not leverage the full capability of IDAM/IDX/PC</p> <p>Impact</p> <ul style="list-style-type: none"> If the full suite of capabilities in IDAM/IDX/PC are not utilised by future reforms, making investments upfront in implementing them may not be worthwhile 	Low Impact	<p>Option 1:</p> <ul style="list-style-type: none"> No upfront investment in the foundational capabilities reduces the risk of regret cost for upfront implementation. <p>Option 2:</p> <ul style="list-style-type: none"> Implementing strategic foundational target state architecture upfront poses the risk of regret cost, mitigated through identification of immediate use cases under DER and Metering Services Review. 	Low Impact	Medium Impact
5	<p>If the industry and AEMO experience resource and management time congestion/constraints, due to a series of initiatives competing for resources to deliver various projects within in NEM Reform Implementation Program:</p> <p>Impact</p> <ul style="list-style-type: none"> Deliverability of the upcoming reforms and meeting timelines may be compromised 	High Impact	<p>Option 1</p> <p>Implement the minimum capabilities to meet the legislative security requirements meaning requires fewer FTEs at any given point in time relative to Option 2a.</p> <p>Option 2</p> <ul style="list-style-type: none"> Implement a strategic target state using a Phased investment approach to enable a more structured approach for the management of option 2 ambitious up-front scope and need for resources reducing duplication of delivery efforts and cost Ensure a collaborative approach with the industry to a robust and detailed transition strategy and roadmap, aligning the industry's requirements with considerations of the industry's concerns The establishment of the strategic and foundational platforms reduces the work required for other reforms in the longer term 	High Impact	Medium Impact
6	<p>If critical existing market functions are impacted due to post go live defects in the system changes implemented</p> <p>Impact</p> <ul style="list-style-type: none"> May impact customers or market functions (e.g. bidding, retail connections) 	Medium Impact	<p>Option 1</p> <ul style="list-style-type: none"> Less of an impact because there are less changes. <p>Option 2</p> <ul style="list-style-type: none"> This risk has been addressed through inclusion of a staged approach including consultation on design, providing LVI capability, a pilot, industry testing and an extended sunset window throughout which current market services remain available 	Low Impact	Low Impact

Low Impact	Medium Impact	High Impact	Critical Impact
------------	---------------	-------------	-----------------

8. Appendix



Appendix A

Heads of Power



Heads of power

- Reform initiatives sit with the AEMC or Energy Ministers
- Strategic and Foundational initiatives sit with AEMO.
- IDX, IDAM and PC have been identified as Strategic and Foundational initiatives.
- AEMO have committed to engaging with industry for assessment, including the development of business case, prior to proceeding in accordance with the governance framework established for the Program available at the following link: [NEM Reform Implementation Roadmap Governance \(aemo.com.au\)](https://aemo.com.au/nem-reform-implementation-roadmap-governance)

Appendix B

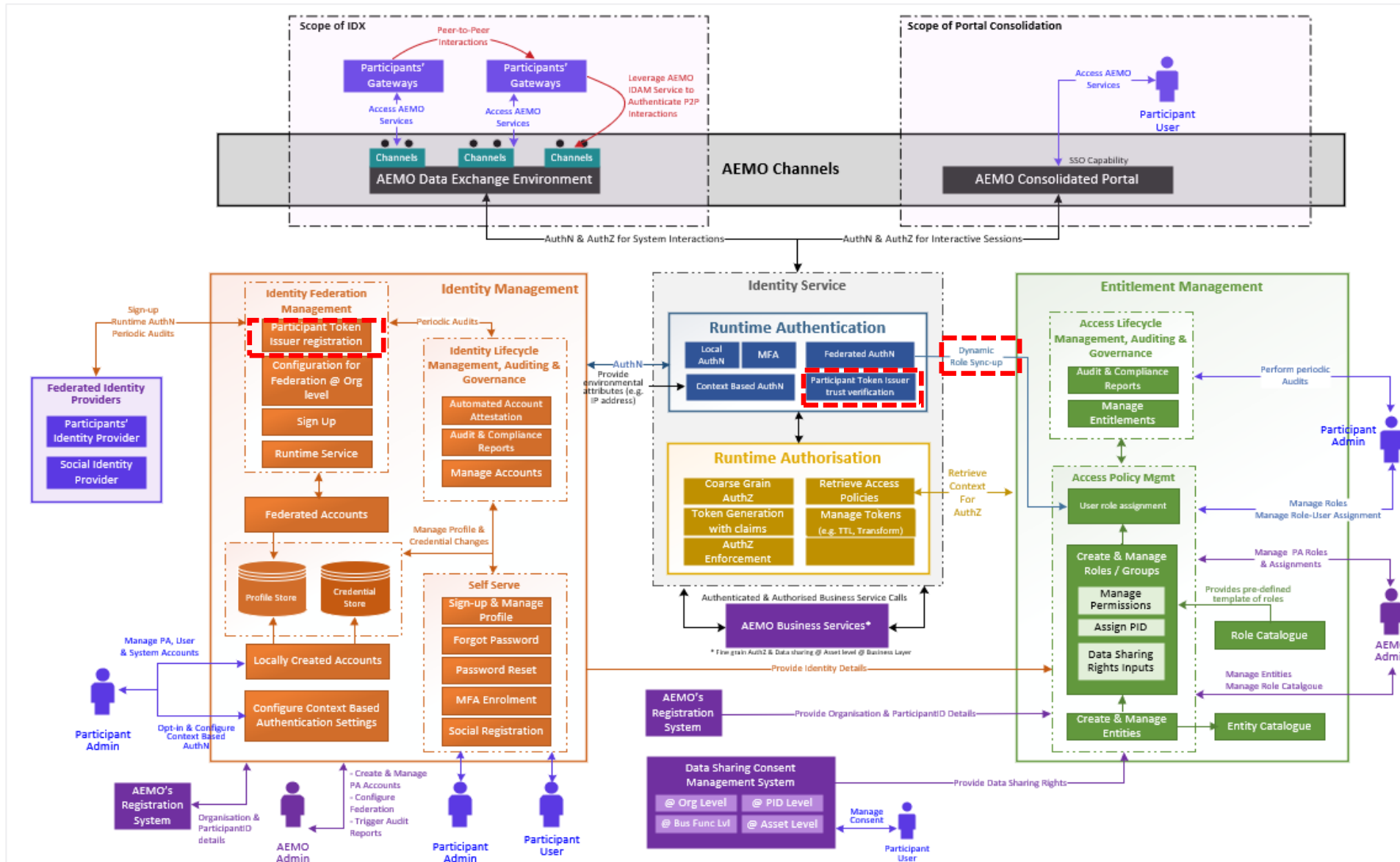
IDAM Target State

IDX Target State

Portal Consolidation Target State



IDAM Target State Conceptual Architectural Design

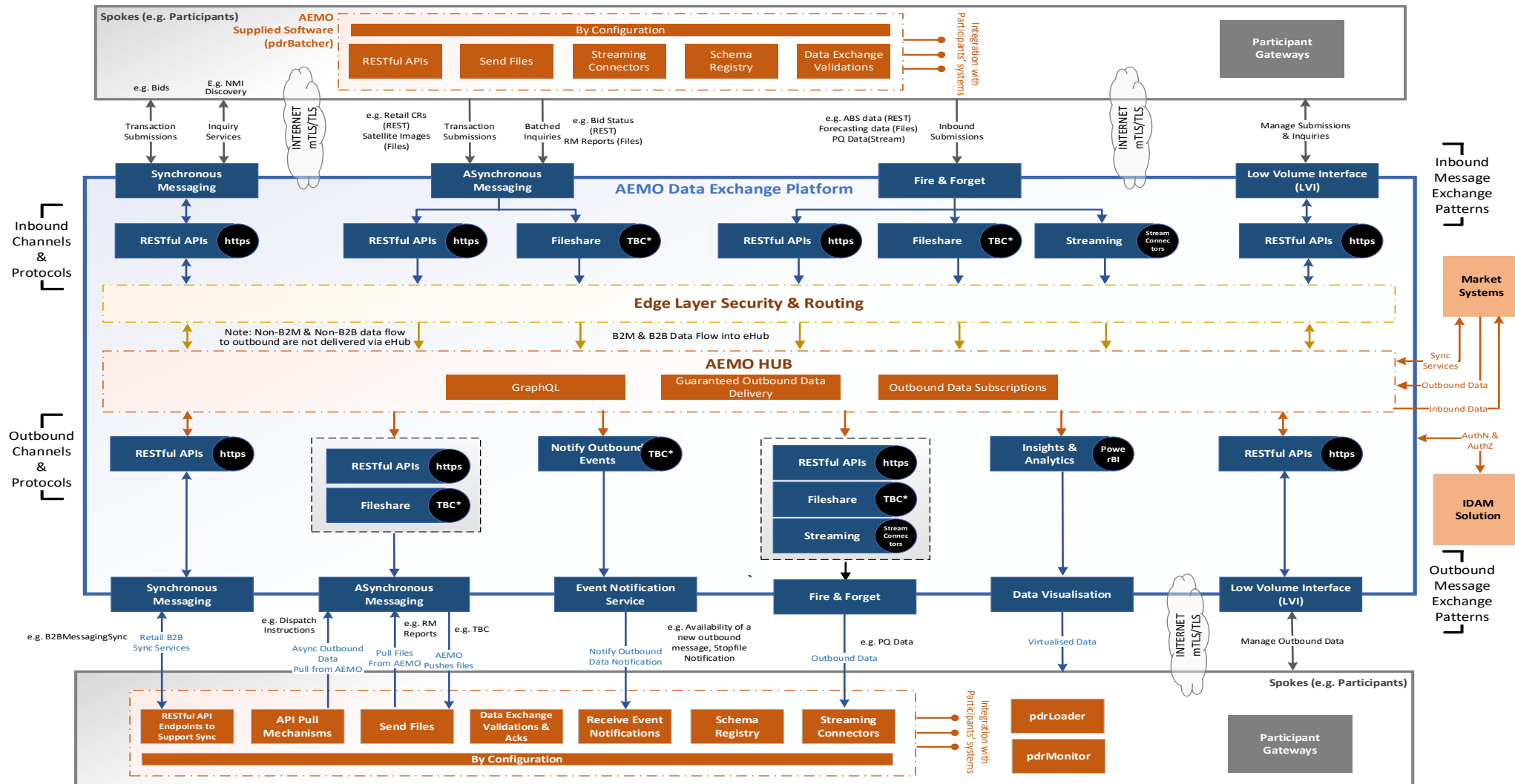


Capabilities added as per Industry feedback:

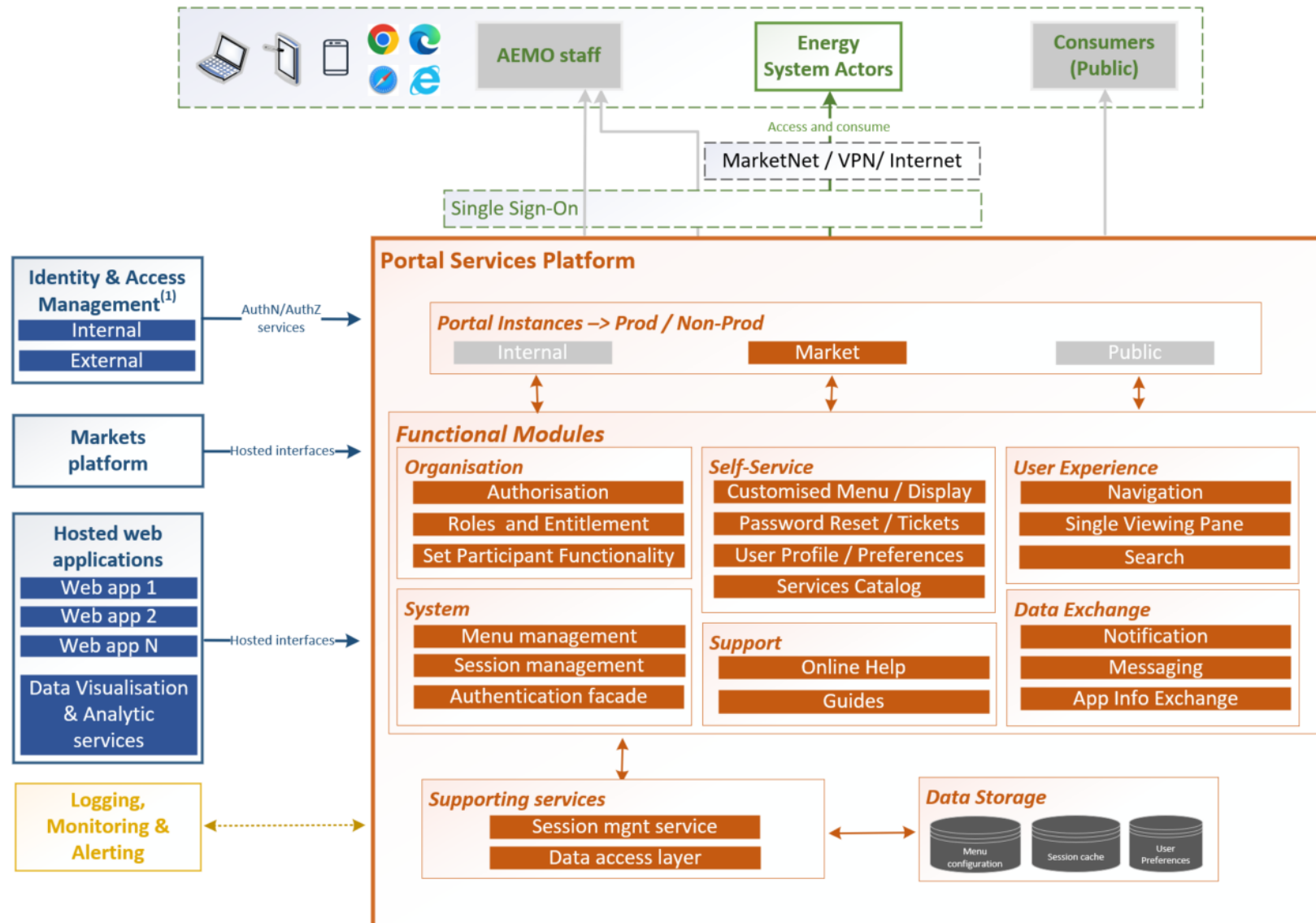
- Auto Role Sync-up
- Service Account Federation

IDX Target State Conceptual Architectural Design

- Target state concepts are summarised in the following conceptual diagram.
- This target state conceptual overview is the basis for IDX transition planning and the business case.



Portal Consolidation Capability View



Appendix C

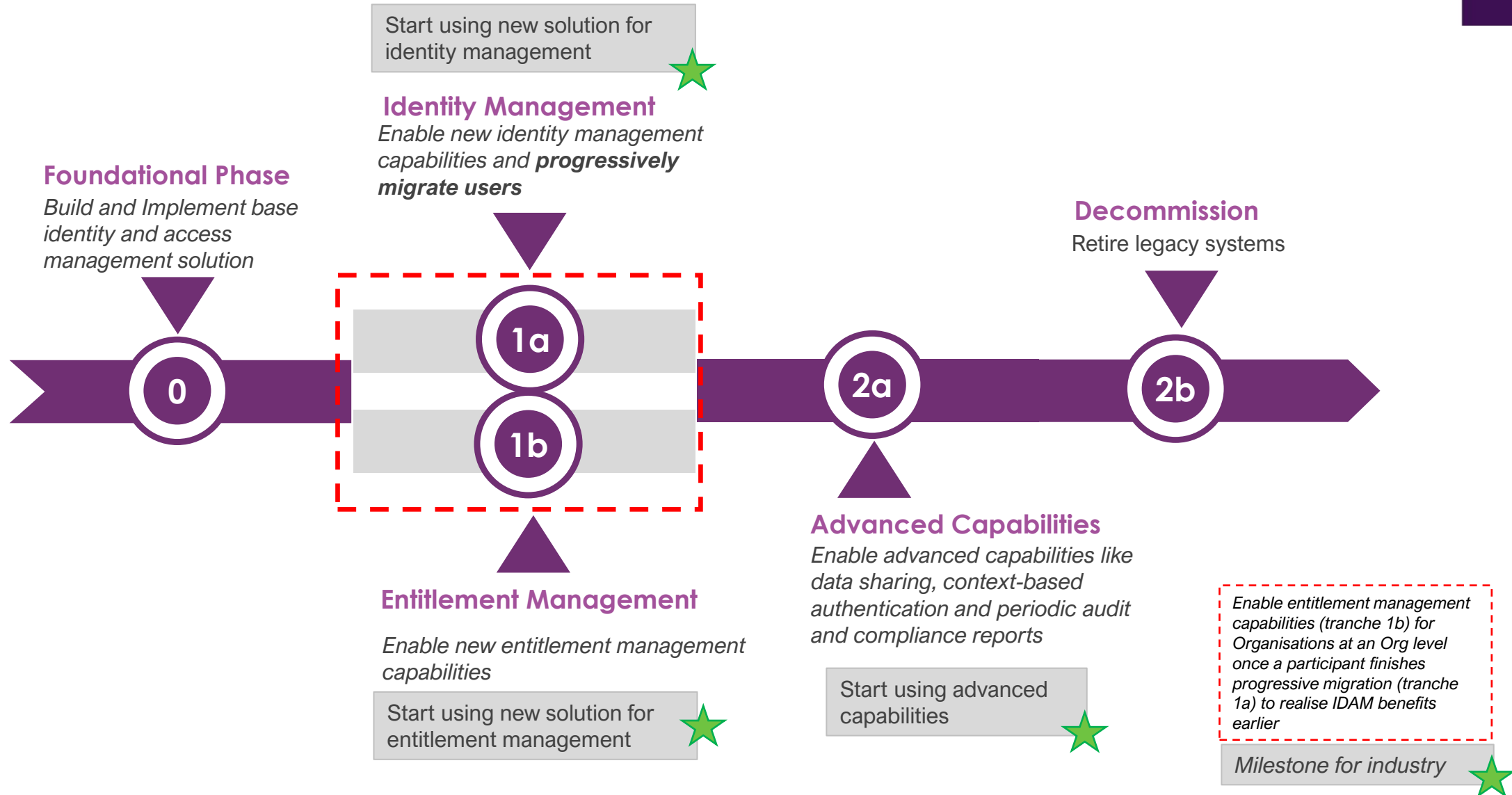
IDAM Transition Strategy

IDX Transition Strategy

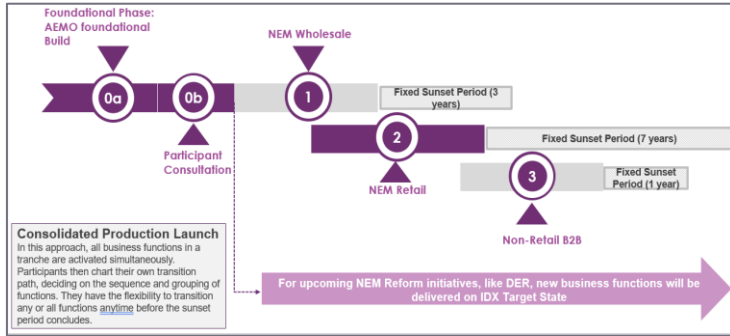
Portal Consolidation Transition Strategy



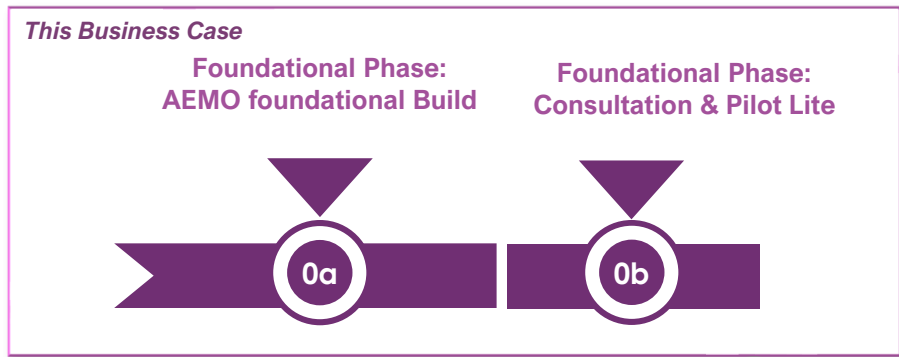
IDAM Transition Tranches Overview



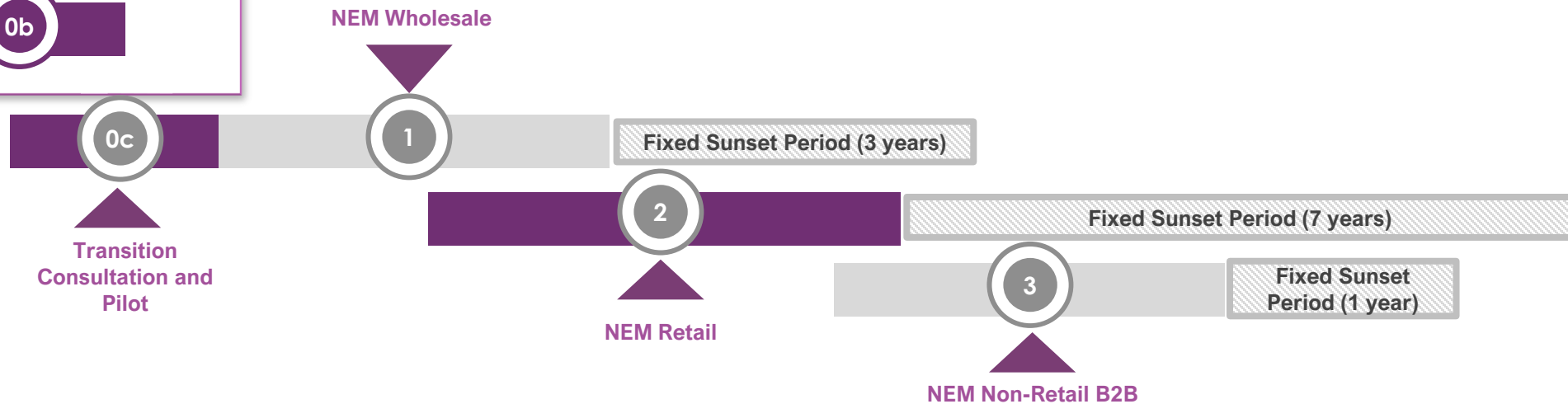
IDX Transition Tranches Overview



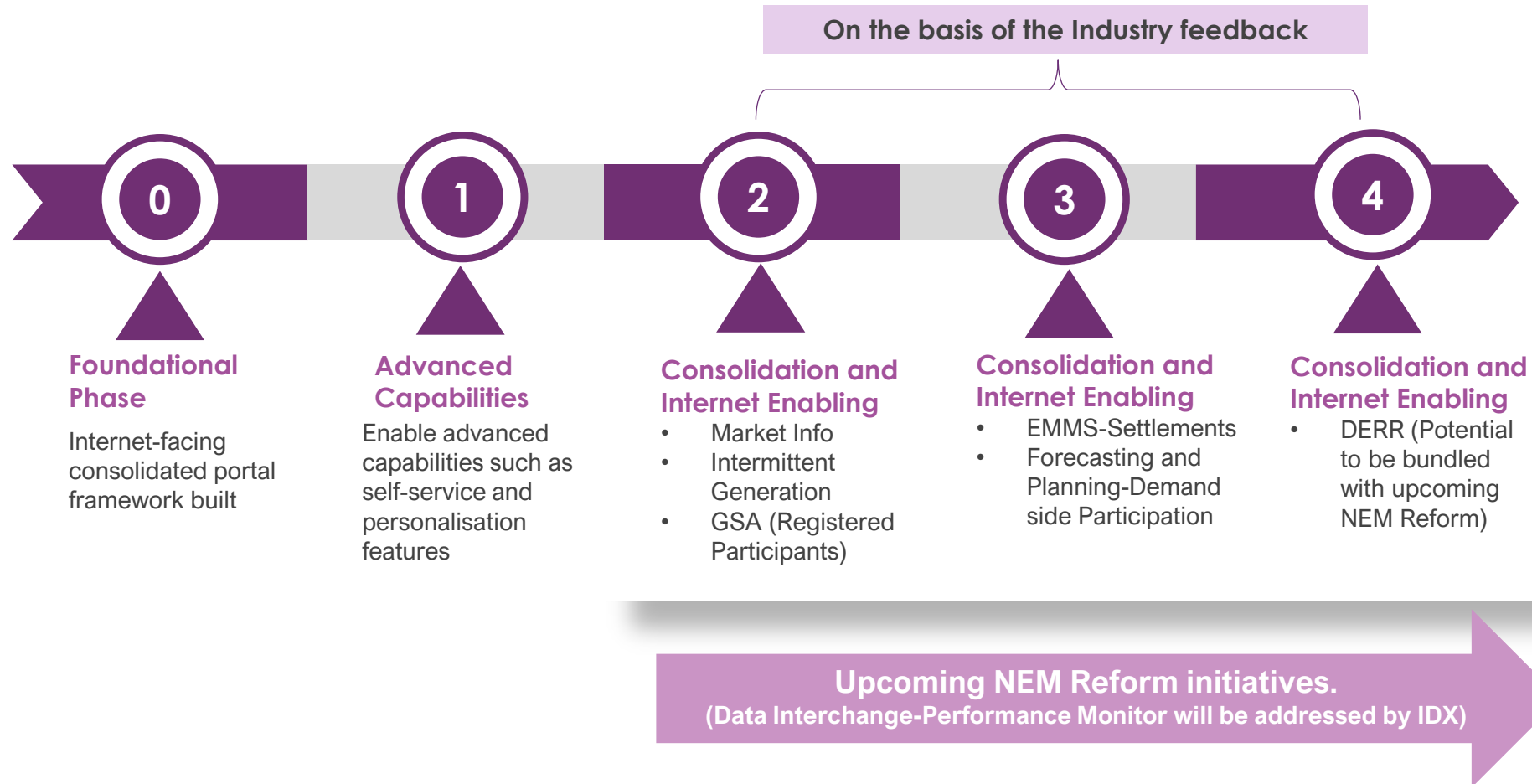
Initial IDX Transition strategy



IDX Proposed Phased Investment Transition strategy



Portal Consolidation Transition Tranches Overview



Web applications which received more than 50% “Yes” vote for moving to the internet, have been included in tranches 2-4.

Appendix D

Comparing Capabilities delivered by Options



IDAM Capabilities – Comparing Options

Key Capabilities	Option 1	Option 2
Enhanced cyber controls	✓	✓
Advanced cyber controls		✓
Organisation based (Establish Organisation Hierarchy)		✓
Enhanced Identity Management (e.g. de-duplicate person accounts)		✓
Enhanced Entitlement Management (e.g. Assign roles to multiple PIDs)		✓
Self-Serve		✓
Federated Identity		✓
Data sharing extensions		✓
Enhanced identity and entitlement assurance processes		✓
Future unification across fuels and markets		✓

Considerations

Option 1

- Will address **only legislatively-driven security requirements** and no other industry **pain point** would be addressed.
- **No foundational framework will be** established for the upcoming reforms leading to increased **siloed** Industry Consultation, Design, Build and Testing times

Option 2

- Option 2 will address **key industry pain points** and enhance security posture by **enabling the agreed target state capabilities**
- **Reduce complexity** by providing single credential access, which in turn will pave the way for future unification across fuels and markets.

IDX Capabilities – Comparing Options

Key Capabilities	Option 1	Option 2a	Option 2b
Enhanced cyber controls (e.g. API AuthN/AuthZ mechanisms, secured data transfers)	✓	✓	✓
Define Target State Channels, Protocols, Patterns & Standards		✓	✓
Uplift AEMO Data Exchange Environment		✓	✓
Enhanced AEMO Gateway Software implementing IDX Target State Patterns		✓	✓
Define Business Endpoints for transitioning the current Business Functions		✓	✓
Define & Build Target State Payload Schemas & Transformations for current Business Functions		✓	
Transition Wholesale Business Functions to Target State		✓	✓
Transition Retail & Non-Retail B2B Business Functions to Target State		✓	✓
New Reforms and/or New Business Functions	Projects Define Patterns	Implements IDX Target State Patterns and payload formats	Implements IDX Target State Patterns and payload formats
Future unification across fuels and markets		✓	Partial

Considerations

Option 1

- Option 1 will enhance Data Exchange **cyber controls**, addressing legislatively-driven requirements.
- **No other industry pain points** will be addressed.
- No foundational framework will be established for the upcoming reforms leading to increased **siload** Industry Consultation, Design, Build and Testing times

Option 2a

- Option 2a will address key industry pain points aligning them to target state **channels/protocols, standards, patterns and payload formats**
- **Reduced complexity** by limiting the diversity of the payload formats for data exchange

Option 2b

- Option 2b will address key industry pain points aligning to target state **channels/protocols, standards and patterns, but will not** address pain points relating to the **legacy monolithic schema**
- **Increased complexity** by retaining legacy payload formats in existing business services

IDX Options 2a & 2b

For the transition of the legacy interfaces, below are two target state options proposed for costing.

Characteristics	Option 2a: Align to target State channels/protocols and payload formats		Option 2b: Align to target state channels/protocols and retain the current payload formats	
	Retail	Wholesale	Retail	Wholesale
Market	Retail	Wholesale	Retail	Wholesale
Definition	<ul style="list-style-type: none"> Adopt business-function-specific schemas and endpoints. Transitioning Retail B2B and B2M to modular schemas aligned with modern payload standards. Implementing unified IDX schemas across all AEMO fuels, markets, and domains. Transition the wholesale AEMO CSV formats to the target state payload standards and formats 		<ul style="list-style-type: none"> Adopt business-function-specific endpoints (to be further assessed during design phase) Continue using the aseXML (Retail) and AEMO CSV (Wholesale) schema concepts as it is in production today n & n-1 transformation managed at the time of the Participant pulling the message from outbound queue based on request header parameters 	
Transactional Message Format	JSON (New)	JSON (New)	Existing aseXML	Outbound: Existing AEMO CSV Inbound: Existing JSON
Bulk Data Format	AEMO CSV (New)	Existing AEMO CSV	Existing Miscellaneous CSV formats	Existing AEMO CSV
Inquiry Services	Use a modern open-source query language such as GraphQL services using JSON format.	Use a modern open-source query language such as GraphQL serviced using JSON format.	<ul style="list-style-type: none"> No inquiry services introduced for existing services Opportunities to support GraphQL for new services in Retail 	Opportunities to support GraphQL for Wholesale current business functions
MDMF	Retired (Deprecated)	N/A	Retained	N/A
MDFF Interval	AEMO CSV (New)	N/A	Existing NEM12	N/A
MDFF Basic	Existing NEM13	N/A	Existing NEM13	N/A

For both options, any new business service (e.g. DER) will align to the industry agreed IDX target state channels and payload formats

Portal Consolidation Capabilities – Comparing Options

Key Capabilities	Option 1	Option 2
Enhanced cyber controls	✓	✓
Enhanced self-service features		✓
Enhanced personalisation features		✓
Internet enabling selected browser services		✓
Future unification across fuels and markets		✓
Single user identity for browser services		✓
Consolidated browser and device standards		✓
Unified user experience standards		✓
Enhanced user documentation		✓

Considerations

Option 1

- Option 1 will **only integrate IDAM MVP** to individual browser services endpoints to address **legislatively-driven requirements**.
- No **other industry pain point** would be addressed

Option 2

- Option 2 will address **key industry pain points** and enhance security posture by **enabling the agreed target state capabilities**
- **Enable single pane of glass** by providing a pathway for future **unification across fuels and markets**

Appendix E

Costing Assumptions



Option 1: Assumptions

- IDX: All existing services will retain their current payload formats, channels and protocol endpoints
- IDX: Any new reform initiatives will be required to define and implement channels, patterns, protocols and payload formats on a case-by-case basis (given no foundational capability)
- IDX: AEMO supplied software for participants will continue with separate wholesale (Pdrbatcher) and retail (participant batcher) data exchange products.
- IDX: Sunset periods associated the transition to security uplifted endpoints will be agreed with industry in the design phase
- PC: All existing portal endpoints will be retained and there will be no new internet enablement of browser services.
- IDAM: All existing person and non-person accounts will remain in the existing identity repositories

Option 2a & 2b: Common Assumptions

- The operating model of markets will retain centrally managed identity and data hub services.
- A High-level conceptual design is sufficient detail to inform the business case, detailed design will be factored into tranche delivery plans
- Foundational tranches will make target state capabilities available for up-coming NEM reforms initiatives to leverage these capabilities.
- New NEM services delivered post the completion of the IDX foundation will leverage the new protocols, patterns and payloads. Services in this context are the equivalent of introducing a new transaction group (such as DER). Change within a transaction or addition of a transaction to an existing transaction group would be enabled on legacy protocols within the sunset period as well as on the new protocols once the associated tranche is delivered.

Option 2a & 2b: Common Assumptions

- AEMO gateway software will still consolidate wholesale (Pdrbatcher) and retail (Participant batcher) data exchange products
- NEM reform initiatives may change their timeline, could be removed or new reforms could be added. Where this occurs, an assessment will be made for impact to the roadmap for these 3 initiatives
- Governance process for procedures and protocols will remain with their existing governing bodies with regard oversight and coordination of updates to enable the transition
- Opportunities for further procedural improvement and / or transactional enhancement in NEM Retail would be assessed in detailed design, the business case will remain conservative and not assume these outcomes.

Option 2a: Assumptions

- JSON will leverage strong types to provide transactional validation. AEMO will continue to provide validation extensions (as currently available in EVM) to capture procedural level transactional compliance (not involving data look up). The combination of these validations will be equivalent to the current aseXML schema validation and EVM validation capabilities provided to participants.
- All non csv based B2B and B2M transactions will move from aseXML to JSON involving definition of new JSON schema on a broadly 'like for like' basis to simplify support for backwards compatibility across the sunset timeframe.
- NEM13 CSV will be maintained however delivered using the IDX protocols and patterns (not embedded in aseXML) given the die on the vine approach in the market to basic metering. All other CSV payloads will move to the new AEMO CSV to be defined within the detailed design phase. Note the AEMO supplied gateway will provide conversion capability for all NEM Retail and Wholesale transactions within the sunset period and the conversion routines as at the end of the sunset period will be available should a participant wish to continue to maintain these if there was a subsequent timepoint. Changes are assumed to be confined to aligning to the new payload format on a 'like for like' basis to simplify support for backwards compatibility across the sunset timeframe. Opportunities for improvement beyond this would be assessed in detailed design however not accounted for at this time.
- Existing JSON payloads may require minor refactoring to comply with industry-agreed payload standards and schemas.

Option 2b: Assumptions

- Existing NEM Retail and Wholesale services will be made available under the new foundational IDX channels and protocols. Existing payloads will be retained with no change
- IDX channels and protocols and IDAM identity patterns in alignment with an IDX target state presented to the industry

Financial Assumptions

- All estimates have an uncertainty range of +/- 40%; All estimates are inflation/CPI excluded;
- Whilst the cost of implementing DER Data Hub and PQ data are covered in those reforms, there is an assumption in those costs that foundational capability would be in place. This cost impact relates to the costs estimated if foundational capability would not be in place
- The energy transition will require an increasing volume, diversity and frequency of data exchange between a wider cohort of energy stakeholders to sustain new market processes. Leveraging the estimated impacts for the upcoming reforms, we anticipate a cost impact on the future budgeted NEM program if the foundational capability was not available, estimated at 10% for data exchange, and 5% for identity management
- IDX Option 1 implementation cost has been added to the DP2 business case as this is related to the tactical uplifts required for the legacy services and not establishing the foundation phase
- IDX foundation does not result in a net delta to operational cost noting that new NEM reforms will be responsible for assessing any uplift requirements for their own projects and the uplift to legacy services will be assessed at Decision Point 2

Appendix F

Industry Cost Extrapolation – Detailed Calculation



Extrapolated Industry Costs

Initiative	Type	Size	# of organisations	Median	Scaling factor calculation	
					Total* Option 2a	Total* Option 1
IDAM	Distributor	N/A	8	\$1.4M	\$15M	<\$1M
	Metering	N/A	7	<\$1M	\$5.5M	<\$1M
	Gentailer	Large	3	\$1.5M (mean since all organisations provided an update)	\$4.5M	\$1.5M
	Gentailer	Medium	10	<\$1M	\$9.4M	<\$1M
	Retailer	Small	10	<\$1M	<\$1M	<\$1M
	DB+M	N/A	3	<\$1M	\$2.6M	<\$1M
	Independent Generator	N/A	10	<\$1M	\$1.0M	<\$1M
	TOTAL:					\$38M
PC	Distributor	N/A	8	<\$1M	\$6.8M	<\$1M
	Metering	N/A	7	-	-	-
	Gentailer	Large	3	<\$1M (mean since all organisations provided an update)	\$1.3M	<\$1M
	Gentailer	Medium	10	<\$1M	\$2.1M	<\$1M
	Retailer	Small	10	<\$1M	<\$1M	<\$1M
	DB+M	N/A	3	\$1.0M	\$3.0M	<\$1M
	Independent Generator	N/A	10	-	-	-
	TOTAL:					\$13M

1. All financial figures presented on this slide have a +/- of 40%

* Total cost includes cost estimates submitted by discrete participants

Extrapolated Industry Costs

Initiative	Type	Size	# of organisations	Median	Total* Option 2a	Scaling factor calculation	
						Total* Option 1	Total* Option 2b
IDX	Distributor	N/A	8	\$7.1M	\$83M	\$24M	\$58M
	Metering	N/A	7	\$4.0M	\$28M	\$8.0M	\$19M
	Gentailer	Large	3	\$30M <small>(note: mean, not median as all organisations provided inputs)</small>	\$90M	\$23M	\$63M
	Gentailer	Medium	10	\$2.8M	\$28M	\$10M	\$20M
	Retailer	Small	10	<\$1M	\$2.6M	<\$1M	\$1.8M
	DB+M	N/A	3	\$8.8M	\$26M	\$9.6M	\$18M
	Independent Generator	N/A	10	<\$1M	\$2.0M	<\$1M	\$1.4M
	TOTAL:					\$260M	\$75M

* Total cost includes cost estimates submitted by discrete participants

1. All financial figures presented on this slide have a +/- of 40%

Appendix G

Risk Assessment Matrix



Risk Assessment Matrix

1. LIKELIHOOD	Likelihood	Probability	Qualitative Description
	Almost Certain	>90%	Will occur in most circumstances
	Likely	51% - 90%	Can be expected to occur in most circumstances
	Possible	11% - 50%	May occur, but not expected in most circumstances
	Unlikely	1% - 10%	Conceivable, but unlikely to occur
	Rare	<1%	Will only occur in exceptional circumstances

1 - LIKELIHOOD	2 - CONSEQUENCE					
	Immaterial	Minor	Moderate	Major	Extreme	
	Almost Certain	Medium	Medium	High	Critical	Critical
	Likely	Low	Medium	High	Critical	Critical
	Possible	Low	Medium	High	High	Critical
	Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High	

2. CONSEQUENCE	Project Delivery				Project Budget	Project Scope	Consequence of the Risk
	Extreme	Project will not deliver in time to comply with Regulatory Commitments or materially impact Market Participants.			Cost impact is greater than 30% of the project budget	Will not deliver on the significant components of the project, and directly impact Regulatory Commitments or Market Participants	The project delivery impact of delays to Regulatory or Market Participant Commitments; Extreme excessive costs; scope impact of a solution that does not materially meet the agreed outcomes and affects Regulatory or Market Participant Commitments.
	Major	Project delivers late with major impact to the AEMO business with medium impact to regulatory commitments and/or market participants			Cost impact between 20% to 30% of project budget	Will not deliver on the significant components of the project	Project Delivery path critically impacted and schedule contingency is exhausted with business implication (impeding relationships and trust); Major excess costs over project budget; scope impact of a solution that has a material impact on the agreed outcomes.
	Moderate	Project delivers late with moderate impact to the AEMO business with low impact to regulatory commitments and/or market participants			Cost impact between 10% and 20% of the project budget	Will deliver all significant components of the project; but will require work arounds or compromises	Project Delivery path critically impacted and schedule contingency is exhausted with no business implication; Moderate excess costs over project budget; significant components of the scoped solution provided, but work arounds or compromises are required.
	Minor	Project delivers late with low impact to the AEMO business			Cost impact between 5% and 10% of the project budget	Will deliver all significant components of the project	Project Delivery path is negatively impacted but there is contingency available to absorb; Minor excess costs over project budget; all significant scoped components of the solution will be delivered.
	Immaterial	Negligible or no impact on timelines			Cost impact to project less than 5% of the project budget	No material impact to the intended project scope	Negligible or no impact on Project Delivery Schedule; Minimal excess costs over project budget.

Risk Rating Methodology

Risk ID	Option 0			Post Mitigation					
	Pre-Mitigation Likelihood	Pre-Mitigation Consequence	Total Rating	Option 1			Option 2		
				Post Mitigation Likelihood	Post Mitigation Consequence	Total Rating	Post Mitigation Likelihood	Post Mitigation Consequence	Total Rating
Risk ID # 1	Almost Certain	Moderate	High	Almost Certain	Moderate	High	Unlikely	Minor	Low
Risk ID # 2	Almost Certain	Extreme	Critical	Possible	Minor	Medium	Unlikely	Minor	Low
Risk ID # 3	Almost Certain	Moderate	High	Likely	Moderate	High	Possible	Immaterial	Low
Risk ID # 4	Rare	Immaterial	Low	Rare	Immaterial	Low	Unlikely	Moderate	Medium
Risk ID # 5	Possible	Moderate	High	Possible	Moderate	High	Possible	Minor	Medium
Risk ID # 6	Unlikely	Moderate	Medium	Unlikely	Minor	Low	Unlikely	Minor	Low

Appendix H

Useful links



Useful links

- All reference documents: [Foundational and Strategic Initiatives](#)
- Introductory Documents
 - [IDAM, IDX and PC Introduction](#)
 - [IDAM, IDX, PC Discovery Workshop](#)
 - [IDAM and PC Pain Points](#)
 - [IDX Pain Points](#)
- Target State
 - [IDAM, IDX, PC Target State](#)
 - [AEMO Gateway Software](#)
 - [AEMO Gateway Software use cases](#)
- Transition Strategy: [IDAM, IDX and PC Transition Strategy](#)
- Business Case
 - [Initial Overview](#)
 - [Cost and Method discussion Part 1](#)
 - [Cost and Method discussion Part 2](#)
- SOCI Reference documents: [SOCi](#)