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CER Taskforce
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

Submitted online via [Have Your Say](#)

Clean Energy Council Submission to Data Sharing Arrangements to Inform Planning and Enable Future Markets (M2)

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback to the Federal Department of Climate Change, Energy, the Environment and Water's (DCCEEW) consultation paper on Data Sharing Arrangements to Inform Planning and Enable Future Markets (M2)

The CEC is the peak body for the clean energy industry in Australia. We represent and work with Australia's leading renewable energy and energy storage businesses, as well as accredited designers and installers of solar and battery systems, to further the development of clean energy in Australia. We are committed to accelerating the transformation of Australia's energy system to one that is cleaner, equal, fair and transparent for all consumers.

Consumer Energy Resources (CER) are an integral part of Australia's secure, affordable and sustainable future electricity system and we view the development of the National CER Roadmap workstreams as an important step in achieving a transition that prioritises consumer outcomes and rewards participation. The approach to align this workstream closely with the Redefine roles for market and power system operators (M3/P5) is strongly supported by the CEC and has provided a strong identification of the key capabilities and associated gaps, in relation to data and data sharing across the power system and energy markets.

We emphasise the need to place consumers at the centre of CER data governance, ensuring that data ownership, rights, and compensation are embedded into outcomes, with appropriate safeguards and opt-in mechanisms for data use. We highlight the importance of recognising that consumer CER data is not freely accessible, and that a cost-benefit analysis will best identify the significant development and pathways needed to inform planning and enable future markets.

We encourage prioritisation of identified gaps through a consumer lens, guided by principles of enhancing choice and participation, protecting non-participants from added costs, ensuring consumer value, and building social licence and trust.

The CEC supports the development of a National CER Data Strategy and Coordination Plan, provided it is co-designed with stakeholders and clearly communicates both consumer and industry benefits. Similarly, we support the proposed Minimum Viable Product for data-sharing arrangements, while noting the need for defined stakeholder access levels, strengthened accountability through asset registration, and integration with existing registers to avoid duplication. We recommend that once established, the National CER Technical Regulator should be responsible for the Plan's delivery, supported by a broad advisory committee drawing on expertise across the sector.

The remainder of this submission directly addresses the questions provided in the consultation paper and provides further details to support the above comments.

If you have any queries or would like to discuss the submission in more detail, please contact Maxime Di Petta (mdipetta@cleanenergycouncil.org.au)

Kind regards,

A handwritten signature in black ink, appearing to read 'M. Di Petta', with a stylized flourish at the end.

Maxime Di Petta
Senior Policy Officer, Distributed Energy, Planning & Environment
Clean Energy Council

Feedback on Consultation Questions

Analytical Framework

Have you identified any significant use cases, roles, data and data-sharing dimensions, or lines of inquiry that the analytical framework has missed?

Data ownership is another significant dimension for consideration within this workstream, it is important that consumer rights and compensation are embedded into the outcomes of this work. Safeguards on the access and usage of consumer data are essential, placing the choice of contribution with the consumer (e.g. opt-in conditions) allows the development of incentives for the use and access to CER data. In turn, this will allow appropriate compensation for stakeholders developing and providing access pathways to data.

Data Gaps

Do you believe there are any significant gaps relating to data roles, access, availability, governance or sharing that this paper has not highlighted? What is the impact of this gap on the Major Outcomes?

The CEC is supportive of the consultation process this workstream undertook to engage stakeholders; including various industry representatives to test conceptual approaches and review detailed artefacts. The 71 distinct data and data sharing gaps across six categories are representative of the challenges related to data sharing arrangements communicated by industry.

However, we encourage this workstream to reconsider the assumption that consumer CER data is free to access and will be easily available in the future for network planning. Access of this data will require significant development of data registries and mechanisms for storage by Original Equipment Manufacturers (OEM). It is recommended this workstream consults further with OEM stakeholders to produce a cost-benefit analysis of the development and support of Australia-specific data requirements. This will best communicate the cost to establish these functions by OEMs and outline potential support needed to establish these functions.

- Do you agree with the prioritisation of the distinct gaps identified within this paper? If not, what would you change and how would this better deliver the vision, outcomes and principles of the National CER Roadmap?

While this project sought to align detailed findings under the same key outcomes as the Redefining roles and responsibilities for market and power system operators (M3/P5) workstream, further consideration of the customer needs to be highlighted in the outcomes. We encourage prioritisation of distinct gaps through a consumer lens, ensuring the agency of consumers as decision-makers in this space is appropriately considered. Hence, the prioritisation outcomes from this workstream should seek to follow these consumer principles:

- Enhance consumer choice and participation
- Reduce/no impact on energy costs for non-participants

- Value to consumer for services provided
- Build social license and trust

These principles indicate that “CER Installation, Commissioning and Customer Enablement” should be a higher priority, as the installation and commissioning of CER is essential for both the customer experience and value gained from investment in these assets.

Are there specific elements of data and data-sharing that you believe are crucial gaps or essential for resolving the gaps identified in this paper? Why are they important?

The clarifying, formalising and standardising of roles and responsibilities relating to data and data sharing as progressed in the parallel workstream (M3/P5) will be essential for resolving gaps identified in this paper. The CEC is supportive of the collaborative approach taken to these workstreams and encourages continued harmonisation moving forward.

While cybersecurity has been identified in this workstream, these needs to be better coordination of this element across the National CER Roadmap workstreams. Activities relating to data harvesting, secure transfer and storage all have significant cyber elements to be addressed. It is important there are clear pathways around data ownership and obligations around safe storage and disposal, these are not currently considered in the M3/P5 workstream.

Proposed Actions for Consideration

Do you agree with the proposed actions in this paper? What considerations, advice or reflections (positive and negative) would you offer for each? Please specify which actions your responses relate to.

Action 1: Developing a National CER Data Strategy and Coordination Plan to drive coordinated activity

The CEC is supportive of the proposed development of a National CER Data Strategy and Coordination Plan. This will provide an opportunity to clearly signal expectations and accountabilities around CER data, reducing duplication and associated costs from different approaches in Australian jurisdictions. It is recommended the identification of key elements for the Plan, including communication on consumer benefits and industry are developed using a co-design process with a range of CER stakeholders.

Action 2: design and Implement a Data Sharing Arrangements Minimum Viable Product comprising:

- the development of Transmission-Distribution (T-D) Coordination and Interfaces
- implementing a CER Asset Registration and Commissioning Strategy
- extending the detailed design and implementation of a CER Data Exchange

The proposed design and implementation of a Data Sharing Arrangements Minimum Viable Product are supported by the CEC. The following considerations should also be included for Action 2:

- Stakeholder access levels within data sharing arrangements need to be defined for Transmission-Distribution Coordination and Interfaces.

- The CER Asset Registration should include information on the importation into Australia or local production of the asset, including the responsible manufacturer or importer will ensure greater accountability.
- The Commissioning Strategy should capture the process of integration, including distribution, sales and installation.
- The detailed design and implementation of the CER Data Exchange should consider integration with the DER Data Register, including potential costs arising from overlap and ability to streamline processes.

In relation to the proposed action for developing a national CER Data Strategy and Coordination Plan, which organisation might best be placed to complete and implement the Plan in line with the outlined assessment criteria?

Once established, the National CER Technical Regulator would be best placed to complete and implement the National CER Data Strategy Coordination Plan. As outlined in the CEC's response to the M3/P5 workstream, as the National CER Technical Regulator should be responsible for clarifying, formalising and standardising actions related to Outcome 1, the integration of this workstream would also be appropriate.

It is important to recognise that there are multiple stakeholders required for the effective delivery of the National CER Data Strategy Coordination Plan. Hence, while the overall ownership and implementation of this plan should fall under the National CER Technical Regulator, support should be provided across the sector.

An initial recommendation made by the Energy Security Board (ESB) in their Governance of DER Technical Standards Rule Change Request¹ was the establishment of advisory committees (either standing or ad-hoc) to provide advice on CER technical standards. The ESB recommended that:

- Committee members should be selected based on their expertise in technical standards and be drawn from the following areas:
 - Market bodies
 - Consumers/consumer representatives with DER experience
 - DNSPs
 - Original Equipment Manufacturers (OEMs)
 - Jurisdictional safety regulators
 - Aggregators, and
 - Standards Australia.
- Members should be appointed by AEMC following a nomination and merit-based selection process.
- Members would not represent specific interests but would rather be selected for their expertise and experience in different dimensions of the DER supply and use chain.

¹ [210806_erc0319_rrc0040_rule_change_request_pending.pdf](#)

These the formation of an advisory committee with the purpose of assisting the development of a National CER Data Strategy and Coordination Plan would be an ideal outcome to ensure the appropriate stakeholder expertise is considered.

Do you have any alternative approaches to resolving the gaps highlighted in this paper?
What are the relative advantages, disadvantages and implementation considerations
Taskforce should be aware of?

No additional comments.