



AGL Energy Limited

T 02 9921 2999

agl.com.au

ABN: 74 115 061 375

Level 24, 200 George St
Sydney NSW 2000
Locked Bag 14120 MCMC
Melbourne VIC 8001

Department of Climate Change, the Environment, Energy and Water

Consumer Energy Resources Taskforce

Submission via DCCEEW website portal

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Consultation Paper – National Consumer Energy Resources (CER) Roadmap – Data Sharing Arrangements – M2

AGL Energy (**AGL**) welcomes the opportunity to provide responses to the questions posed by the Consumer Energy Resources Taskforce (**CER Taskforce**) in response its Consultation Paper on Data sharing arrangements to inform planning and enable future markets.

AGL supports the three outcomes (System Security & Emergency Management, Visibility and Predictability and Effective Orchestration) described in the CER Taskforce's consultation paper. AGL also broadly supports the proposed actions to develop a National CER Data Strategy and Coordination Plan and to develop a Data Sharing Arrangements Minimum Viable Product (MVP).

While AGL acknowledges the complexity of the transformation underway in the energy sector, the ways in which consumers will interact with the energy system are still evolving. Multiple products and services are emerging that will enable consumers to make the most out of their CER and share the value of these resources with other energy users, while limiting network and market impacts in most circumstances. Safeguards will be critical to support the operation of a high CER system, but future energy reforms should not presume all consumers will want to, or be able to, become active energy market participants.

It will be essential to ensure that any investments in data sharing arrangements are supported by robust evidence of need and can clearly support the resolution of the challenges identified. Understanding the costs and benefits of these investments is crucial before committing customer funding to system builds. Importantly, initiatives to obtain information on CER devices and their operations should only occur where the requirements are proportionate to the system need. Privacy should always be prioritised when dealing with customer data.

AGL acknowledges there is a need to improve information sharing across businesses to lower costs for consumers and improve CER integration. However, there is also a strong need to ensure the data that is already available to industry and market bodies is fully utilised. AGL notes that in the face of uncertainty, there is a risk of building solutions that simply do not deliver on their intended benefits.

Appendix A includes responses to select questions in the consultation paper. If you have any queries about this submission, please contact Andrea Espinosa on aespinosa2@agl.com.au.

Yours sincerely,

Ralph Griffiths

GM Policy and Market Regulation

AGL Energy



About AGL

Proudly Australian for more than 187 years, AGL supplies energy and other essential services to residential, small and large businesses and wholesale customers. AGL is committed to providing our customers with simple, fair and accessible services as they decarbonise and electrify the way they live, move and work. AGL is investing in flexibility and has been making strong progress against our grid-scale battery and distributed energy resources (DER) targets. As of FY25 AGL had 1.49 GW of decentralised assets under orchestration, and a FY27 target of 2.5 GW of demand-side flexibility. AGL is also a market leader in the development of innovative products that enable consumers to make informed choices on how and when to optimise their energy usage to better manage their energy costs.



Appendix A – Response to consultation questions

Question	Response
Have you identified any significant use cases, roles, data and data-sharing dimensions, or lines of inquiry that the analytical framework has missed?	<Blank>
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?	<Blank>
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?	<p>AGL broadly agrees with the gaps categories, but notes that the detail of what is needed (and therefore what should be prioritised) will be intricately related with the findings of the M3/P5 consultation paper. AGL's view is that many of the assumptions in both papers – including whether all consumers will want to, or be able to, become active energy market participants – should be tested.</p> <p>AGL is also concerned about the volume of information that would need to be exchanged in an 'ideal' scenario. AGL does not agree that near-real time frequency and latency has been fully justified across most use cases. The costs of this approach would likely outweigh its benefits. The CER Taskforce should look for ways to minimise the volume of data collected through this process.</p> <p>The CER Taskforce should also be mindful of the sensitivity of data related to CER devices and their operations. Where information is sought on consumers' CER, it will be important to ensure this is supported by customer acceptance either through the creation of the right incentives or through effective engagement from industry and governments.</p>
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?	<Blank>
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	<p>AGL broadly supports the actions in this paper. However, the level of information collected through this process should not go beyond what's strictly necessary for system and network management.</p> <p>The CER Taskforce should ensure the data sharing MVP:</p> <ul style="list-style-type: none"> • is based on strong evidence of need based on demonstrated system and network risks from CER

Question	Response
<p>which actions your responses relate to.</p>	<ul style="list-style-type: none"> • is underpinned by the appropriate data privacy measures, which include consideration of which information needs to be collected, which information can be shared and who can be granted access • includes a coordination element across workstream (2a, 2b, 2c) to ensure there is no duplication. <p>The CER Taskforce should also consider the trade-offs of data access to non-market participants. While there are benefits of this approach – such as improving the coverage of data sharing arrangements – broader access to this data (and the associated data bases) could exacerbate privacy and cyber security risks. The report itself notes that across all use cases categorised, 20% of data was identified as Critical and 58% as Restricted. AGL also notes the complexities of procuring data from parties which are currently outside of the scope of the national electricity laws and rules, as this could affect the quality and completeness of the information (and therefore it's useability).</p> <p>Action 2c would leverage the CER Data Exchange, which is expected to be built on the foundations of AEMO's Industry Data Exchange (IDX) and Identity Access Management (IDAM) services. These initiatives are still under development and have proven complex even in their initial iterations. It may be premature to plan an expansion on these systems when their initial design and effectiveness is still in question.</p>
<p>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?</p>	<p><Blank></p>
<p>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?</p>	<p><Blank></p>