

6 November 2025

Ms Anna Collyer

Chair

Australian Energy Market Commission

Lodged by online submission

Dear Ms Collyer,

ETSI Submission: ERC0415 - Enhancing Access to Information by Participant Representatives (Electricity)

ETSI welcomes the opportunity to comment on AEMO's proposed rule change (Ref. ERC0415) to enable the disclosure of confidential information directly to participant-authorised representatives.

Nothing in this submission is confidential.

ETSI is a specialist forecasting and operational services provider that supports multiple market participants across the NEM, and we strongly support enhancing access to information by participant representatives. However, this rule change proposal appears silent on a number of key issues, and ETSI recommends that further clarifications are necessary to meet the needs of registered participants using third party contracted participant representatives. Our clients (registered participants) rely on timely, accurate, and secure access to market and operational data to provide self-forecasting, market compliance, and performance monitoring services that enhance power system security and market efficiency, and their participant representatives should be provided data access with the same scope and service levels applicable for the data their authorisation.

We commend AEMO and the AEMC for recognising the importance of modernising current data access arrangements, enabling participant-authorised third parties (such as forecasting providers) to obtain secure, traceable access to AEMO systems via the new Identity and Access Management (IDAM) framework. This reform needs to address long-standing operational inefficiencies and cybersecurity risks associated with indirect access models and shared credentials.

In 2024, ETSI explored gaining a MarketNet connection to improve the efficiency of data access and improve our detection of bad quality site data when it occurs. A Participant ID is required to setup and use AEMO's data sharing arrangements to access the necessary client data. However, there was no suitable participant class for ETSI to become a registered participant, and therefore was not eligible to acquire a Participant ID. This situation encourages third parties to implement IT processes and workarounds which are not considered best practice, and have other implications for time critical real-time market data such as increased data latency. The situation also leads to sharing of VPN tokens and other access sharing arrangements which are not best practice from a security perspective.

Direct data access for participant representatives will lead to improved forecast accuracy which is both critical to the energy transition and significantly beneficial to our clients. Deviations between dispatch targets and actual generation are a growing technical challenge in the clean energy transition, with the risk of large surges or deficits escalating as more variable renewable generators are connected to the grid. Enhancing data access for authorised representatives is a necessary step which will directly improve the accuracy and resilience of renewable self-forecasting within operational timeframes.

ETSI agrees that this reform will:

- Improve operational efficiency and forecasting accuracy;
- Strengthen power system security through improved real-time data access;
- Reduce cybersecurity risks and remove shared credential practices; and
- Enable innovation and competition in operational support services.

However, to maximise effectiveness, ETSI recommends that the final rule and associated procedures explicitly address:

- Operational diversity and multi-client service arrangements;
- Standardised governance, and service levels;
- Clear scope and minimum data access standards;

These are discussed further below:

1. Operational diversity and multi-client service arrangements

1.1 Access must be for all authorised representatives, not just those which are registered participants

The AEMC's consideration should recognise that the contracted service providers are most likely not registered participants, and ensure that the proposed rule makes it clear that access to essential market data will be extended for all authorised businesses, irrespective of their registered participant status.

1.2 Access credentials and system access are different

AEMO's rule change proposal is silent on the mechanism that authorised representatives must use to access private data. In Section 2.2 of AEMO's rule change proposal, AEMO state that the external parties will be able to use their own credentials, however credentials are not sufficient without system access, such as via a secure MarketNet connection.

For instance, it is not clear whether the authorised representatives must already have (or be eligible to have) secure access to utilise any new credentials, such as a MarketNet connection.

2. Standardised governance and service levels

2.1 User management of Authorised third party user accounts

To ensure identity management of authorised third party user accounts does not become burdensome for participants themselves, ETSI recommends the IDAM framework should provide capability for participants to allow authorised third parties to manage their own user accounts and credentials. ie the participant should authorise a user administrator for their authorised third party, in the same manner that a participant User Administrator manages the user accounts for the Participant.

2.2 Mandatory credential traceability and audit logging

ETSI recommends that the IDAM framework provide access to credential traceability and audit logging for both the participant and their authorised third party for their respective accounts. This will reduce the burden on AEMO and participants if the respective contracted third parties can have greater visibility for credential and audit purposes.

2.3 Service levels

It is not clear whether a participant will have any ongoing dependence on AEMO to setup and configure system and data access for their authorised third party within the new **Identity and Access Management (IDAM)** framework. This detail would likely sit within procedures AEMO will develop in which AEMO will set out the "processes, terms and conditions of authorisation and access to confidential information in AEMO systems".

ETSI recommends that, should there be any dependence on AEMO to provide such access, then AEMC should consider defining SLAs for AEMO to provide their function to ensure efficient processes that minimise impact on both the participant and their service provider. SLAs are critical for the provision of operational services and will support innovation and competition in providing operational services.

3. Clear scope and minimum data access standards

3.1 Scope of Data

ETSI recommends the AEMC consider defining a minimum dataset availability, or otherwise to provide clarity that there is no limitation on the scope of data and all data accessible by the participant should be accessible to the contracted third party if authorised by the participant.

3.2 Timeliness of Data Availability / Publication

This rule change should ensure that contracted service providers acting as authorised representatives are granted secure access to the relevant dispatch market data with the same timeliness as any other energy business operating under real-time obligations. The timeliness of data availability is critical - the service provider may be providing real-time services and they need access to the same real-time data as the participant with no additional unnecessary latency.

Key Benefits

This reform and these clarifications will directly strengthen operational (self) forecasting and system security:

- **Single Source of Truth**

Whether through direct MarketNet access or an alternative technological mechanism, providing direct AEMO data access ensures that all stakeholders operate from identical, validated datasets. This alignment minimises the risk of data discrepancies and latency between AEMO, participants, and their service providers. It is essential that all parties have timely access to the same market information to maintain consistency and reliability.

Direct access to AEMO data enables service providers to accurately understand the operational status of the assets they support - without needing to infer conditions from external or incomplete data sources. Moreover, obtaining data directly enhances the efficiency of service providers delivering critical functions to their clients, which in turn improves overall market efficiency and performance.

- **Enhanced Detection of erroneous site data**

Real-time access allows forecasting providers to identify and flag SCADA or telemetry anomalies faster, preventing the propagation of bad data back through into the dispatch process. This in itself will improve power system security.

Alignment with the National Electricity Objective

ETSI's recommendations all align with the National Electricity Objective (NEO) by enhancing efficiency, security, and reliability through:

- **Reduced operational risk** from improved data timeliness and integrity;
- **Improved market efficiency** via accurate forecasting and compliance;
- **Lower long-term costs** by reducing manual data relay and mitigating errors; and
- **Strengthened system security** through modern access and audit frameworks.

ETSI strongly supports the AEMO enhancing access to information by participant representatives and this rule change in principle, but recommends the above refinements and clarifications are necessary to strengthen its implementation ensuring the rule's intent is fully realised in practice.

Please don't hesitate to contact us regarding any questions relating to this submission, or if we can support the AEMC further through the consultation process. ETSI looks forward to further engagement with AEMO and the AEMC on this matter, and would welcome the opportunity to engage directly with AEMO during the development of the procedural and technical frameworks to ensure operational needs are effectively met.

Kind regards,

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