

18 March 2026

Ms Anna Collyer  
Chair  
Australian Energy Market Commission  
Via online portal  
Project reference code: ERC0415



Dear Ms Collyer,

### **Enhancing access for registered participant representatives (Electricity)**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on its draft rule to allow the Australian Energy Market Operator (AEMO) to share confidential information directly with third parties.

This submission is provided by Energy Queensland on behalf of its related entities:

- distribution network service providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);
- retailer, Ergon Energy Queensland Pty Ltd; and
- affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Energy Queensland supports this initiative to improve authorised parties' access to information within AEMO's systems, enhance operational efficiency and strengthen data security as part of a broader suite of measures to support the energy transition.

Under the current information access framework, Registered Participants (RPs) are permitted to share confidential information with specified third parties such as service providers, employees, and advisers for defined purposes.

Clause 8.6.5 in the National Electricity Rules requires that RPs must indemnify the Australian Energy Regulator, the AEMC, and AEMO for any loss arising from a breach of the confidentiality provisions by the RP or its officers, agents, or employees. However, we are concerned with the proposed indemnity amendments that would extend this obligation by requiring RPs: "...to indemnify market bodies for loss suffered due to acts or omissions by disclosees, regardless of whether AEMO or a registered participant discloses the information".<sup>1</sup>

We consider this rule expansion unreasonable because it requires RPs to accept liability for circumstances beyond their control. For example, if AEMO's cyber environment were compromised, leading to inaccurate data being released to disclosees, or confidential information being exposed to unauthorised third parties, RPs would have no ability to mitigate such breaches. RPs have no oversight of, or influence over, AEMO's cyber security systems and should not be required to indemnify for losses arising from failures within AEMO's control.

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<sup>1</sup> [Draft determination Enhancing access for registered participant representatives](#), Box 2, p7.

The existing indemnity is appropriate where an RP is responsible for releasing confidential information, as the RP retains control over the process and the integrity of its data. However, it is not reasonable to extend this liability to situations where the RP no longer has custody, control, or oversight of the information.

Should the AEMC wish to discuss this please contact either myself, or Lindsay Chin on 0459 642 052. Otherwise, we look forward to the next stage in the process to implement other elements of this sensible rule, including in assisting in the development of the relevant procedures.

This submission contains no confidential information and may be published.

Yours sincerely

A handwritten signature in blue ink that reads "Alena Christmas".

Alena Christmas  
**Manager Regulatory Affairs**

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