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Opportunities for CER participation in wholesale markets and grid services – Final Summary Report

Energy Consumers Australia
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Context

Increased participation of CER in wholesale markets and grid services has the potential for both system and consumer benefits

The potential benefits of greater integration of CER are significant and, with the correct market and regulatory settings, could flow through to consumers through lower system costs and lower electricity prices

- Effective Consumer Energy Resources (CER) integration and increased demand flexibility will improve the utilisation of existing generation capacity, reduce lost value from curtailment of existing utility-scale and residential solar installations and mitigate increasing transmission costs.
  - Modelling commissioned by ARENA finds a net benefit from increased CER and greater demand flexibility, with reduced generation and storage costs of up to ~ $18b.[1]
  - Greater amounts of CER and demand flexibility can also provide network benefits, including peak demand reduction, minimum demand (shifting consumption into low demand periods), and increased hosting capacity. Some sources estimate savings in network costs of > ~$10b through reduced capital investment, reducing the costs passed through to consumers. [2]
- The behind-the-meter (BTM) CER ecosystem is rapidly evolving, with new technologies creating greater opportunity for all consumers to harness benefits.
  - Consumers with CER will benefit through cost savings through increased CER participation, potentially including reward mechanisms for energy export.
  - Energy security will be improved through enhanced grid stability and more flexible energy use.
  - Increased participation by more households in CER technologies can also provide social benefits, improving social licence and reducing cross-subsidies that may be borne by vulnerable consumers.

Notes: [1] As per NERA Economic Consulting modelling commissioned by ARENA in 2022; [2] As per the UTS Institute for Sustainable Futures report prepared for ARENA, which utilised Baringa Partners modelling prepared in 2021

Priority areas

- This report identifies three key priorities to enable increased CER participation in wholesale markets and provision of grid services within the NEM, supported by three key recommendations.
- Further to these recommendations, the report identifies five general enabling actions that must be accelerated through the CER Roadmap and/or NEM Wholesale Review to support these key recommendations, along with broader NEM design considerations.
- Our findings, informed by stakeholder interviews and international research, highlight the need for these recommendations and enabling actions to be implemented in a coordinated manner to unlock the full potential of CER participation.

There are three key priorities to enable increased CER participation in wholesale markets and provision of grid services within the NEM

Maximising the value CER brings to the system unlocks the greatest benefits for all consumers – both for those with and without the capacity to invest in a more active relationship between their energy resources and the broader energy system

1. CER Coordinating Body

Assign formal responsibility for overall coordination and direction of CER to a dedicated and enduring national body.

2. CER Vision and Targets

Set a clear vision and targets for CER participation for incorporation into NEM planning documents.

3. Targeted NEM Reform

Lower barriers for CER participation in the NEM through focused reform to existing NEM processes.

Supported by enabling actions and broader NEM design considerations

There is a need for a clear delineation of roles and responsibilities across the CER value chain, with enduring national oversight

RECOMMENDATION 1: Assign formal responsibility for overall coordination of CER to a dedicated and enduring national body.

CER offers the potential for a lower cost energy transition – achieving that potential requires an enduring national body to coordinate CER's role in the NEM.

Specific actions to assign roles and responsibilities:

1. An independent national body with sufficient power and authority should be responsible for the coordination of the CER ecosystem, including (but not limited to):
    i. setting an enduring vision for the role of CER in the NEM and developing a strategy to achieve that vision
    ii. setting clear short and long-term targets for CER adoption and coordination
    iii. monitoring and reporting on the delivery of the CER Roadmap and annual achievement of targets for CER adoption and coordination, identifying actions to address shortfalls
    iv. development of fit-for-purpose policy and rule change requests, including the recommended reforms to existing NEM processes (identified in this report) to lower barriers for CER participation
    v. sponsoring and coordinating industry trials (both policy and market-led) to inform further system redesign aimed at optimising customer, network and whole-of-grid value (as identified in this report).

A clear vision for CER participation must be established through setting CER targets to inform NEM planning

RECOMMENDATION 2: Set a clear vision for CER and targets for CER participation in the NEM.

The establishment of a formalised annual planning and target setting process for CER will help to establish CER as a mainstream pillar of the energy ecosystem and will allow for a clear vision for the future of CER participation in the NEM.

Specific actions to establish targets:

1. The enduring national body is to be responsible for the establishment and ongoing operation of an annual planning process that sets specific targets for CER participation over different planning horizons.
2. These targets should be accompanied by an action plan with short, medium and long-term goals for CER participation with executive accountability.
3. The national body is to establish the framework and parameters for the development of CER-specific forecasts for incorporation into AEMO and other system planning documents.

CER participation can be encouraged by lowering wholesale market barriers through targeted reforms to the existing NEM

RECOMMENDATION 3: Implement targeted reforms to existing NEM processes to lower barriers for CER participation.

Facilitating participation in the wholesale market can lead to beneficial market and system outcomes, and will provide increased revenue potential for CER owners through access to markets. Higher participation may lower costs for all customers.

Specific actions to encourage greater CER participation:

1. Lower participation thresholds for CER from their current level of 1MW to 100kW[1], in line with international markets. For example:
    i. PJM allows small scale resources (minimum 100kW) to aggregate and participate in wholesale markets, and CAISO enables aggregations as small as 0.5 MW.
    ii. NEBEF allows consumers with a minimum demand response capacity of 100kW to participate directly as a 'demand response aggregator'
2. Enable multi-node aggregation for CER, with geographical restrictions limited to those critical for management of power system security, as applies for Wholesale Demand Response.
3. Modernise metering and telemetry rules and standards to account for both supply and demand-side market integration, reflecting the characteristics of CER to the extent practicable while ensuring power system security and the integrity of markets.
4. Enhance the dispatch methodology in the NEM as required to achieve optimised system and resource allocation outcomes that incorporate CER, factoring in dynamic operating envelopes, VPP status and the provision of local network support. Opportunities for investigation based on international markets include, for example:
    i. NEBEF has introduced more flexible dispatch protocols and longer dispatch lead times for CER.
    ii. The UK (through the Open Networks Project) has established clear rules for dispatch prioritisation.

Notes: [1] Changes to participation and bidding thresholds for other technology types could also be considered.

Enabling actions must be accelerated through the CER Roadmap and/or NEM Wholesale Review to support these recommendations

Enabling Action 1: Accelerate technical standards	Enabling Action 2: Formalise the DSO role	Enabling Action 3: CER-specific consumer empowerment	Enabling Action 4: CER-specific consumer protections	Enabling Action 5: Pricing reform
Harmonised standards with central coordination will ensure faster and more cost-effective technical solutions to CER implementation and allow smoother CER integration in markets.	A formalised and consistent DSO role across the NEM, with clearly defined DSO responsibilities, will support retailers and aggregators to facilitate increased participation in existing markets, and enhance the potential for new markets (e.g., flexibility markets).	Fit-for-purpose consumer empowerment and protections will improve social licence through a more engaged customer base that understands its role in the new energy future, and seeks to benefit through participation in energy markets.		Pricing reform, to improve cost-reflectivity of tariffs for those customers and loads with the capacity to respond, has the capacity to increase CER participation through improved investment signals, and can help to socialise the benefits from CER participation through lower network costs.
Key considerations: • Standardisation should be sought between different DNSPs in the NEM, across Australia (including WA), as well as with international standards. • Cyber security is viewed by many stakeholders as the most critical area for standards development and should be fast-tracked.	Key considerations: • The DSO role must be defined, encompassing the management and coordination of CER, with consideration given to potential integration of responsibilities into the DNSP function, and/or establishment of a new Distribution Network Operator role. • In line with this shift, network regulation needs to evolve to promote innovation, recognise the various roles CER can play and reflect the new/modified roles of actors across the ecosystem.	Key considerations: • The CER Coordinating Body should have responsibility for the development of best-practice consumer empowerment campaigns and materials for CER, and oversight of consumer empowerment activities. This is to ensure activities are tailored, trusted and publicised, and that consumers have a one-stop-shop to access relevant information and guidance.	Key considerations: • Consumer protection frameworks should evolve, with the flexibility to account for the broader range of energy services available to consumers. • The CER Coordinating Body should have an overarching market obligation (such as a duty of care) which ensures consumers that purchase and operate CER are confident they will be protected from harm.	Key considerations: • The lid should be lifted on the NERL to recognise the changing nature of energy markets to a dynamic two-way flow of energy and revenue. • Consideration should be given to new dynamic pricing models, with greater coordination between distribution and retail tariffs, while maintaining simplicity for those who desire it. • Network revenue determinations should be made fit-for-purpose and reflect the role CER can play in avoiding capital expenditure.

Broader NEM redesign must account for the contribution of CER, at both the local grid level and the power system as a whole

The role and contribution of CER must be also promoted through broader NEM redesign

Controllable and predictable CER at scale will lead to deferred investment in local and utility-scale network, generation and storage assets by avoiding and/or alleviating network constraints at the source, reducing costs for consumers. CER will also be accounted for in any major overhaul to NEM design or new market mechanisms.

Specific actions to maximise market efficiency through CER participation:

1. Examine new models for CER participation, including through CER trials (e.g., regulatory sandboxing or ARENA funding programs depending on whether policy or market-led), to advance the efficient provision of an optimal level of CER, including consideration of:
    i. a good, better, best approach to device optimisation for all customers, to support bill relief, and maximise network /wholesale market value
    ii. the potential for local flexibility markets that allow for both supply and demand-side participation and are co-optimised with the wholesale market, such as those developed in the UK
    iii. the balance of incentives for Distribution Network Service Providers (DNSPs) between traditional Capex and Opex models for network determination to minimise disincentives to the use of non-network solutions
    iv. fit-for-purpose ringfencing and asset sharing rules and guidelines to avoid locking out efficient solutions that minimise costs for consumers

Research conducted

- The findings and recommendations in this report have been informed by research into mechanisms to support greater participation of CER and demand response in 5 different jurisdictions, identifying design features with relevance to the NEM and lessons learned through implementation and operation.
- Supplementing this desktop research, stakeholder interviews provided the perspectives of parties playing differing roles in the developing CER ecosystem, drawing out existing limitations and opportunities for improvement.
- Stakeholders interviewed for this report include market bodies, DNSPs, specialist CER/demand response aggregators, peak industry bodies and independent experts.

Significant opportunity exists for CER participation in the NEM, with the national CER Working Group driving national reforms

CER opportunity and integration initiatives in the NEM

Status of CER integration initiatives in the NEM	AEMO's Integrated System Plan projects that coordinated CER will play a significant role in the NEM, providing up to 37GW of capacity by 2050, supporting grid reliability, improving system resilience and reducing overall costs for consumers. The **National CER Roadmap**, agreed to by Energy Ministers, contains a range of initiatives planned for the NEM to facilitate the integration of CER. The Roadmap is organised into four workstreams – Consumers, Technology, Markets and Power System Operations – and sets out a range of priorities to address barriers and harness the full potential of CER. The program of work underpinning the Roadmap is being led by the Consumer Energy Resources Working Group and Taskforce, comprising state and territory government officials. The workstreams outlined in the CER Roadmap are being led by various organisations, including AEMO, AEMC, AER and state/national bodies.
NEM overview - CER participation and barriers in the NEM	Our market research, supported by insights from key energy industry experts, has identified several significant barriers affecting CER participation within the NEM: • **Insufficient economic incentives (i.e., rewarding economic value)**, including high upfront costs, limited financial returns and restricted access to the full CER value chain, discourage investment in CER technologies and participation in programs such as demand response. • **The complexity of systems and services** creates challenges for consumers, particularly small customers, navigating technologies, regulations and markets. • **A lack of confidence and trust in the market**, alongside a growing consumer preference for investing in CER to achieve self-sufficiency and disengage from traditional energy markets, further constrains active market participation, driven by scepticism about CER benefits and distrust of energy providers. • **Limited consumer empowerment** reduces awareness of CER opportunities, while delays in regulatory reform hinder effective market integration. • **Misalignment and lack of coordination between wholesale and distribution-level markets** restrict CER's ability to provide grid services efficiently. • **Participation thresholds** exclude small-scale CER owners from accessing wholesale or ancillary service markets. Addressing these barriers is essential to unlocking the coordinated CER services needed to support the dynamic future state of the NEM.

Notes: [1] For the purposes of this report we have used 2024 AEMO's Step Change scenario for CER forecasts in the NEM as it was voted the most likely by stakeholders.

Our analysis from a jurisdictional scan of five markets identified useful insights for addressing barriers to CER participation

Key findings from jurisdictional review – Overview

Overview	In this phase, we conducted a jurisdictional scan and desktop research to inform and target stakeholder engagement. This included analysing market settings affecting CER participation in the NEM, reviewing five jurisdictions for demand-side participation models and reported benefits of CER participation, exploring consumer access to wholesale markets and understanding mechanisms for load management and capacity investment. Our research examined several market mechanisms and programs of note, including: • PJM's DER Aggregator Model, which utilises PJM's locational marginal pricing and streamlined processes to boost CER participation. • CAISO's Proxy Demand Resource mechanism, which enhances flexibility through dynamic pricing and robust telemetry. • The UK's Open Networks Project, which standardises processes to reduce barriers and promote flexibility markets. • France's NEBEF mechanism, which lowers participation thresholds to expand CER participation. • The WEM's Reserve Capacity Mechanism design, with particular focus on the modes through which CER interacts with it. These insights helped to shape both our stakeholder engagement and findings and recommendations.

The UK Open Networks Project demonstrates the benefits of central coordination, and the standardisation of roles and services

Key findings from the jurisdictional review – UK

Key findings from UK

Our analysis of the UK, particularly the Open Networks Project, provides numerous key insights that offer valuable context for the NEM and its future development:

- **Coordination:** The central coordination observed through the UK's Open Networks Project enabled the establishment of clear rules on dispatch prioritisation, harmonised data sharing and improved planning processes to streamline market operations and enhance network management. The UK implemented network flexibility markets within two years by leveraging standardisation and coordination across distribution companies, market bodies, Government and industry stakeholders.
- **Local Flexibility Markets:** The UK has successfully created standardised local flexibility markets that recognise the value of CER to distribution networks while ensuring integration with wholesale markets for coordination and visibility.
- **Tech Standardisation:** The UK's standardisation of flexibility products across distribution networks has simplified market participation and improved efficiency, with 80% of flexibility tenders using common technical specifications.
- **Totex:** The UK's Totex approach combines capital and operational expenditure, balancing incentives so as to promote cost-effective solutions like flexibility services over traditional infrastructure investments.
- **Role and Success of DSOs:** DSOs in the UK have clearly defined DSO roles and responsibilities, and play a critical role in managing CER, ensuring real-time grid stability and facilitating local energy markets. The DSO roles contributes to the active balancing of supply and demand through advanced data management and automation, while maintaining reliability and efficiency.

The US markets show that successful CER integration requires clear aggregation frameworks, pricing signals and technical standards

Key findings from the jurisdictional review – USA (PJM and CAISO)

Key findings from USA

Our analysis from the USA scan found several innovative approaches being implemented to address participation barriers, including:

- **Lower Participation Thresholds:** PJM's DER Aggregator Model allows small-scale resources (minimum 100kW) to aggregate and participate in wholesale markets, reducing barriers to entry. CAISO's Proxy Demand Resource (PDR) mechanism enables aggregations as small as 0.5MW, combined with dynamic pricing, to incentivise demand flexibility and improve grid responsiveness.
- **Locational Marginal Pricing (LMP):** Transparent pricing systems in PJM and CAISO provide real-time price signals reflecting grid congestion and marginal costs. This allows CERs to optimise participation based on location-specific value (e.g., higher prices in constrained areas during peak demand).
- **Aggregation Frameworks:** Both PJM and CAISO use aggregation models that allow multiple small-scale CER to participate in wholesale markets as larger units, highlighting the importance of coordination between aggregators, utilities and system operators.
- **Dynamic Pricing Mechanisms:** CAISO incentivises demand flexibility through dynamic pricing, enabling CER to adjust energy usage based on real-time price signals and enhancing market responsiveness.
- **Streamlined Registration Processes:** PJM's structured registration process includes standardised agreements and technical assessments, lowering entry barriers while maintaining reliability.
- **Technology Standards and Interfaces:** Simplified communication requirements (e.g., CAISO's standardised telemetry) and robust data-sharing protocols (e.g., PJM's DER data specifications) reduce integration costs and improve market confidence.

Insights from France and the WEM highlight the value of inclusive policies, flexible designs and capacity market participation

Key findings from the jurisdictional review – France and WEM

Key findings from France	Mechanisms such as the NEBEF demand response scheme and France's decentralised capacity market demonstrate how inclusive policies, flexible protocols and economic incentives can enhance CER integration. • **Lowering Participation Thresholds:** The 100kW minimum threshold for participation encourages broader engagement in energy and capacity markets. • **Flexible Dispatch Protocols**: Longer dispatch lead times in NEBEF broaden participation but may limit responsiveness. • **Economic Incentives (i.e., rewarding economic value):** In markets that provide bifurcated energy and capacity revenue streams, CER participation can be enhanced by enabling eligibility for CER to earn capacity payments, as observed in France's capacity market. • **Baselining Challenges:** Baselining of consumption can be a useful approach to measure customer-side participation, but accuracy can be challenging, particularly for small consumers. France's experience includes an ability for an aggregator to use self-forecasting for baselining, backed by robust monitoring and assessment to mitigate against manipulation or inaccuracies.
Key findings from the WEM	The WEM shows that capacity mechanisms are highly sensitive to design and that inflexible obligations can limit CER participation despite technical readiness. Project Symphony, a CER orchestration pilot, demonstrates how aligning market frameworks with CER capabilities and customer preferences can unlock CER potential. • **Capacity Market Participation Pathways**: Customers need not be 'sellers' in capacity markets or mechanisms. They can engage in the WEM's Reserve Capacity Mechanism (RCM) as demand netted from capacity targets, "sell-side" providers (e.g., aggregated CER), or "buy-side" purchasers (e.g., retailers hedging risks). • **Addressing Design Barriers:** Restrictive facility class obligations have historically limited CER participation in the WEM. Reforming these rules is critical to accommodate new technologies and aggregation models effectively. Projects Symphony and Jupiter highlight how tailored approaches can unlock CER potential. • **Economic Incentives (i.e., rewarding economic value):** Ensuring up-front costs do not outweigh benefits is vital for small customers and aggregators to actively participate in markets, including in capacity markets/mechanisms. Transparent financial structures can drive broader engagement.

Our interviews uncovered key themes of concern to stakeholders around incentives, standard harmonisation, tariffs and coordination

Key insights from stakeholder engagement

Rewarding economic value

- Stakeholders consider that CER is not rewarded for the full value of the services it can and does provide to the energy system.
- Stakeholders noted there is a need for more dynamic pricing models and better financial incentives to overcome issues with social licence and customer motivations
- Stakeholders also suggested a role for government incentives, with clear communication on purpose
- Participation thresholds were also seen as a blocker to uptake, especially in a nascent market

Technical standards

- Stakeholders viewed consistency in technical standards as a major barrier for CER uptake in Australia, noting the importance of aligning with international standards given that Australia is a relatively small market
- There was a call for more central coordination, with all stakeholders interviewed calling for faster reform in this area

Tariffs and pricing

- Stakeholders acknowledged the work being undertaken by the AEMC on pricing reform, while also calling for greater innovation, especially in relation to network pricing models
- Dynamic pricing models and a greater range of tariffs were cited as tools to unlock more value for consumers through personalised pricing based on behaviour and consumer preferences
- There is a call for principle-based regulation to facilitate more flexible and faster pricing resets, allowing for more dynamic market responses

Coordination

- The lack of a formal entity to effectively coordinate CER presents significant integration challenges and lost opportunity
- A faster pace of reform is desired, including in relation to the DSO role definition and establishment of data sharing protocols and processes
- In the meantime, DNSPs have needed to react to, and implement backstop measures (e.g., emergency solar curtailment) to mitigate emerging grid security challenges
- Ring-fencing rules restrict DNSPs' ability to deliver innovative CER solutions as the focus remains on traditional models and definitions for Capex

Social licence

- Managing consumer expectations and earning trust is crucial throughout the process of integrating CER as flexible responsive assets
- Current policies, such as backstop mechanisms and export tariffs, complicate social acceptance and exacerbate consumer distrust
- Consumers are primarily motivated by energy independence and self-consumption, resisting external control over their assets
- It is essential to ensure that the benefits of CER are equitably distributed among all consumers, not just those who own CER

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