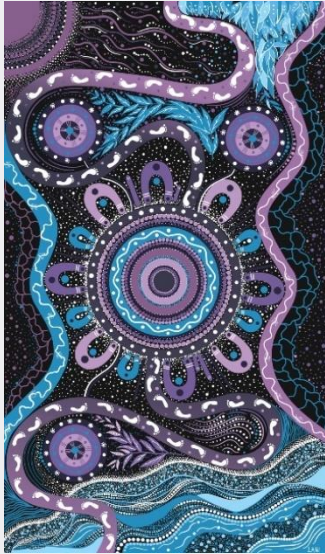


National Electricity Market Participant Fee Structure Review – to commence 1 July 2026

Stakeholder Engagement Plan





We acknowledge the Traditional Custodians of the land, seas and waters across Australia. We honour the wisdom of Aboriginal and Torres Strait Islander Elders past and present and embrace future generations.

We acknowledge that, wherever we work, we do so on Aboriginal and Torres Strait Islander lands. We pay respect to the world's oldest continuing culture and First Nations peoples' deep and continuing connection to Country; and hope that our work can benefit both people and Country.

'Journey of unity: AEMO's Reconciliation Path' by Lani Balzan

AEMO Group is proud to have launched its first [Reconciliation Action Plan](#) in May 2024. 'Journey of unity: AEMO's Reconciliation Path' was created by Wiradjuri artist Lani Balzan to visually narrate our ongoing journey towards reconciliation - a collaborative endeavour that honours First Nations cultures, fosters mutual understanding, and paves the way for a brighter, more inclusive future.

Important notice

Purpose

This engagement plan outlines our intended stakeholder engagement approach to support the development of the National Electricity Market (NEM) Participant Fee Structure to apply from 1 July 2026.

We will continue to evolve and amend this plan as required throughout the period of consultation to optimise our approach and ensure its suitability. We will consider all feedback to improve this plan and any future stakeholder engagement.

Disclaimer

This document or the information in it may be subsequently updated or amended.

This document does not constitute legal or business advice and should not be relied on as a substitute for obtaining detailed advice about the National Electricity Law, the National Electricity Rules, or any other applicable laws, procedures, or policies.

The Australian Energy Market Operator (AEMO) has made reasonable efforts to ensure the quality of the information in this document but cannot guarantee its accuracy or completeness.

Accordingly, to the maximum extent permitted by law, AEMO and its officers, employees and consultants involved in the preparation of this document:

- make no representation or warranty, express or implied, as to the currency, accuracy, reliability, or completeness of the information in this document, and
- are not liable (whether by reason of negligence or otherwise) for any statements or representations in this document, or any omissions from it, or for any use or reliance on the information in it.

Copyright

© 2025 Australian Energy Market Operator Limited. The material in this publication may be used in accordance with the [copyright permissions on AEMO's website](#).

Version control

Version	Release date	Changes
1	5/03/2025	First release
2	9/04/2025	Second release – updated timeline

Contents

1.	Overview	2
2.	Purpose of the engagement	2
2.1.	Engagement goal	2
2.2.	Engagement objectives	3
3.	Our engagement principles commitments.....	3
3.1.	AEMO’s Stakeholder Engagement Framework	3
3.2.	Principles guiding this consultation	4
4.	Engagement approach	4
4.1.	Scope	4
4.2.	IAP2 Spectrum alignment.....	5
4.3.	Engagement and communication methods.....	5
5.	Key stakeholders	7
6.	High-level engagement schedule	8
7.	Evaluation	9

1. Overview

This engagement plan supports AEMO’s consultation on the structure of National Electricity Market (NEM) participant fees to recover the costs associated with its roles and functions as the market and system operator of the NEM from 1 July 2026.

The current structure of AEMO’s general NEM participant fees¹ commenced on 1 July 2021 for a duration of five years and will end on 30 June 2026. Since the determination of that fee structure, there have been changes to the market operational functions AEMO administers. These include the Consumer Data Rights (CDR) and the NEM2025 Reform Program declared NEM projects, for which costs are now being recovered. AEMO has also commenced consultation on the cost recovery, from 1 July 2025, of AEMO’s new cyber security roles and responsibilities introduced in the National Electricity Rules (NER) in December 2024. These changes have increased the complexity of AEMO’s market and system operator functions, as well as imposing new responsibilities. This is typified in the work undertaken to deliver the aforementioned reforms in collaboration with industry stakeholders, and the increasing breadth and depth of analysis delivered through AEMO’s key publications, such as the Integrated System Plan (ISP) and Electricity Statement of Opportunities (ESOO).

The focus of this engagement and consultation will be to determine a participant fee structure for recovering AEMO’s costs from NEM Registered Participants for the period commencing on 1 July 2026 (**NEM Participant Fee Structure**). AEMO is required under Rule 2.11 of the NER to develop, review and publish a fee structure for NEM Registered Participants that is applicable for an appropriate period. This process must be conducted in consultation with stakeholders, and in accordance with the consultation requirements detailed in Rule 8.9 of the NER.

This review provides the opportunity to consider all aspects of AEMO’s NEM Participant Fees Structure. AEMO will involve stakeholders to develop options for cost recovery through the consultation process and will be seeking input and feedback from stakeholders.

Specifically, the review will include consideration of the existing fee categories, the Registered Participants that are charged and the attribution of costs they are allocated, which charging metrics are used, and the term (length) of the fee structure itself. It is our aim to **inform**, **consult** and **involve** stakeholders to determine a fee structure in accordance with the Rules.

This review process is separate to AEMO’s annual budget and fees consultation.

2. Purpose of the engagement

2.1. Engagement goal

This plan outlines AEMO’s proposed approach to engaging with stakeholders during the consultation of the Participant Fee Structure to apply from 1 July 2026. Our goal for this engagement is:

To provide stakeholders with the opportunity to be informed, consulted and involved in the development of NEM Participant Fee Structure to apply from July 2026.

AEMO is committed to working through the views and perspectives of our stakeholders in relation to developing a new fee structure, in accordance with the Rules. Importantly, AEMO will engage closely and transparently with stakeholders to understand their perspectives on the current fee structure, alongside options for the NEM Participant Fee Structure to apply from 1 July 2026.

¹ AEMO, Electricity Fee Structures: Final Report and Determination, March 2021, available at <https://wa.aemo.com.au/consultations/current-and-closed-consultations/electricity-market-participant-fee-structure-review>

2.2. Engagement objectives

Our engagement objectives are to:

- Provide all NEM Registered Participants with the opportunity to be **informed, consulted** and **involved** in the development of our proposed fee recovery mechanisms, through a transparent and publicly accessible process.
- Actively consider the views of stakeholders regarding aspects of the fee structure that are in the scope of this review.
- Provide opportunities for early input from stakeholders through the discussion of the Consultation Paper and Draft Determination.
- Develop a NEM Participant Fee Structure to apply from 1 July 2026 that is in accordance with the Rules and supports AEMO in delivery of its functions as Australia’s independent market operator and system planner.

The objectives of the engagement activity align to the engagement goal and AEMO’s [Strategic Corporate Plan](#) priorities. AEMO is committed, through our Strategic Corporate Plan objectives, to engaging our stakeholders, to build trusted relationships among governments, businesses, and communities to work together to find solutions to complex problems the energy transition presents.

3. Our engagement principles commitments

3.1. AEMO’s Stakeholder Engagement Framework

AEMO has agreed a set of engagement principles to guide our work with stakeholders that can be found in our Stakeholder Engagement Framework. Our commitment to stakeholders is that we are:



Credible



Reliable



Close



Self-aware

We have developed this set of commitments which we will focus on as part of this engagement. These commitments reflect contemporary, good practice engagement, and are consistent with feedback we have received from stakeholders (e.g. through other consultations and our annual stakeholder engagement research) about what is important to them. Key commitments for how we intend to engage through the consultation on the 2026 NEM Participant Fee Structure include:

- We engage genuinely, with honesty, authenticity, and humility.
- We are open and transparent about our information.
- We are intentional in our engagement and clear about which decisions stakeholders can and cannot influence.
- We want to ensure that we respect the time and resource constraints of stakeholders when engaging and will work to continually improve the stakeholder experience.

You can find out more about how we uphold these principles on [our website](#).

3.2. Principles guiding this consultation

In addition to our stakeholder engagement principles, we have established a clear set of principles to specifically guide how we consult to formulate the NEM Participant Fee Structure to apply from 1 July 2026. This assessment framework includes:

- **Simplicity** – a pragmatic approach to achieving a fee structure that is easy to understand and implement.
- **Transparency** – each step in determining the new fee structure will be communicated openly with a clear rationale.
- **Strategic** – in the development of the new fee structure we will seek to be forward looking to ensure the fee structure is enduring for the determined period.
- **Collaborative** – early and open collaboration, making sure all impacted stakeholder groups are involved.

The NER includes a list of Participant Fee Structures principles under NER 2.11.1, the above assessment is intended to be complementary to this.

4. Engagement approach

This section provides detail on what is in and out of scope for the review, our target level of engagement as mapped against the IAP2 Spectrum of Public Participation, key stakeholders that we have identified and what engagement and communication methods we will use.

4.1. Scope

As per the Rules, the consultation provides the opportunity to revisit all aspects of AEMO’s existing NEM Participant Fee Structure.

Table 1 Review Scope

In scope	Out of scope
<ul style="list-style-type: none">• All existing NEM fee categories, including Registration fees.• Which NEM Registered Participants are charged each fee.• The approach for allocating costs to each Registered Participant or group of Registered Participants.• The relevant metrics (or tariffs) for recovering each fee (e.g., \$/MWh or \$/NMI).• The period or periods which the fee structure will apply.	<ul style="list-style-type: none">• The quantum or amount to be charged to NEM Registered Participants, which is determined separately via AEMO’s annual budget and fee process.• The commencement date of the fee structure under consultation.• Any aspect of AEMO’s NEM Participant Fee Structures that is already determined in the National Electricity Rules (e.g. ECA funding).• The fee structures for the WA Wholesale Electricity Market (WEM) and East Coast Gas Markets.

4.2. IAP2 Spectrum alignment

The International Association of Public Participation (IAP2) Spectrum is a globally recognised framework that we continue to apply in our engagement approach.

AEMO will target our engagement for this review at the **inform** level and up to the **involve** level of the IAP2 engagement spectrum.

We have outlined in detail our intended application of the IAP2 spectrum for each engagement method we intend to use in section 4.3 of this plan.

Table 2 IAP2 levels of engagement²

	Inform	Consult	Involve	Collaborate	Empower
Engagement goal	Provide balanced and objective information to assist understanding of the problem, alternatives, opportunities, and solutions.	Obtain feedback on analysis, alternatives and/or decisions.	Work directly with key stakeholders throughout the process to ensure concerns are consistently understood and considered.	Partner with some stakeholders during decision making, including development of alternatives and the identification of the preferred solution.	The final decision is made by select stakeholders.
Engagement promise	We will keep you informed.	We will keep you informed, listen to, and acknowledge concerns and aspirations, and provide feedback on how input influenced our decision.	We will work with key stakeholders to ensure their concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how their input influenced the decision.	We will look to some stakeholders for advice in formulating solutions and incorporate their advice and recommendations into the decisions to the maximum extent possible.	We will implement what select stakeholders decide.

4.3. Engagement and communication methods

We will provide a range of opportunities for stakeholders to meaningfully engage with us on the development of the NEM Participant Fee Structure to apply from 1 July 2026. The implementation of this engagement approach will be guided by the scope and nature of the issues raised through the consultation period, which will influence the type of consultation activities we undertake.

To support this engagement, we will leverage existing structures such as current AEMO committees and forums, and other communication channels, where appropriate, to reduce the time commitment for industry and AEMO throughout the consultation process.

The main engagement methods to be used are detailed in the following subsections.

4.3.1. Industry Webinars and / or Workshops

Registered Participants and wider stakeholder groups will be provided the opportunity to participate in a series of industry webinars and/or workshops. These webinars or workshops will be designed to both identify issues for consideration in the consultation process and subsequently discuss matters detailed in the Consultation Paper and Draft Determination, as well as any issues raised in submissions received to these reports. The purpose of this engagement will be to support the development and refinement of the NEM Participant Fee Structure and development and consideration of options by AEMO.

² Source: IAP2 International. Adapted for AEMO use. [IAP2 Published Resources - IAP2 Australasia](#)

AEMO will determine the engagement format (e.g. online or in-person workshops) and frequency based on consultation issues and matters identified for discussion. These sessions will be conducted at from the **inform** to the **involve** level of the IAP2 spectrum.

4.3.2. One-on-One Engagement

AEMO aims to hold targeted one-on-one meetings with peak bodies and stakeholders to explore specific issues, as requested. These individual meetings will be used to identify and discuss key issues throughout the consultation process and will be conducted on the **consult** level of the IAP2 spectrum.

4.3.3. Financial Consultative Committee

AEMO will **involve** the Financial Consultative Committee (FCC) throughout the review process. AEMO notes that AEMO’s annual budget and fees on which the FCC is consulted must be prepared in accordance with the NEM Participant Fee Structure, and it is therefore appropriate to continue to leverage the expertise and views of FCC members.

4.3.4. Consumer and Community Reference Group (CCRG)

In 2024, AEMO established a Consumer and Community Reference Group (CCRG) to allow for targeted consultation on an ‘as required’ basis on energy issues with consumer and public interest advocates. The CCRG provides the opportunity to better understand broader community sentiment, execution challenges and opportunities presented by the energy transition. The group includes members representing various stakeholder segments, such as energy consumers, regional communities, Traditional Owners and environmental interest groups.

We will **consult** with the CCRG about issues and options proposed in the Consultation Paper and Draft Determination, as well as in AEMO’s consideration of submissions received in relation to these documents.

Table 3 Engagement and communication methods

Method	Intent	Indicative timing or frequency
Consultation	Formal consultation: On the Consultation Paper and Draft Determination, in accordance with the NER requirements.	April 2025 – March 2026
	Consumer advocate verbal submissions to formal consultations: To allow consumer advocates to contribute in a way that does not require the resources necessary to produce a written submission.	During all major engagements (see Section 6)
	Industry Webinars and/or Workshops: Will be used by AEMO to provide information and updates on the fee structure options where appropriate. More focused webinars / workshops may be used to discuss issues identified in the consultation process.	As needed during engagement
	1:1 Engagement: Individual meetings with peak bodies and Registered Participants as requested to inform and discuss key issues throughout the consultation process.	As requested during engagement
	Financial Consultative Committee (FCC): AEMO to provide updates to the FCC and seek feedback and input for the development of Consultation Paper and Draft Determination.	Updates to FCC meetings
Forums	Community and Consumer Reference Group (CCRG): Targeted engagement with consumer representatives with relevant expertise. Engagement focused on the key issues and options to be considered in the Consultation Paper, Draft and Final Determinations.	As needed during engagement
	Consumer Forum: To engage with and keep consumer advocates informed on key milestones of the fee structure engagement process, including key issues, options for consideration and opportunities for input.	As needed during engagement

Briefings	Other AEMO Forums: To provide information and updates on how to participate in the consultation with key AEMO forums and committees.	As needed during engagement
	Energy Market body briefings: We will use regular meetings with energy market bodies to provide an update on consultation, issues and options under consideration as appropriate and feedback received through consultation, as necessary.	As needed during engagement
	Government briefings: We will ensure governments are aware of the consultation process, issues and options under consideration, and feedback received through consultation, as necessary and appropriate.	As needed during engagement
Newsletters	Newsletter: AEMO's newsletters will be used to widely inform stakeholders of the consultation process and how to participate.	As per regular publication timeframes
Fact sheets	Summary 'consumer friendly' fact sheets: Fact-sheets will be created to support stakeholders through the consultation to support and to provide an overview of the final Fee Structure.	Alongside the Consultation Paper and at the time of publication of the Final Determination for the NEM Participant Fee Structure
Website	Website content: Will be published in an easily accessible, comprehensive, and timely manner.	Regularly and as required

5. Key stakeholders

The below table highlights key stakeholders who will be the primary targets of our engagement and communications activities. These stakeholders have been identified as the most relevant due to the extent to which they are impacted by, and their interest in, AEMO's cost recovery mechanisms and fee structures for the NEM.

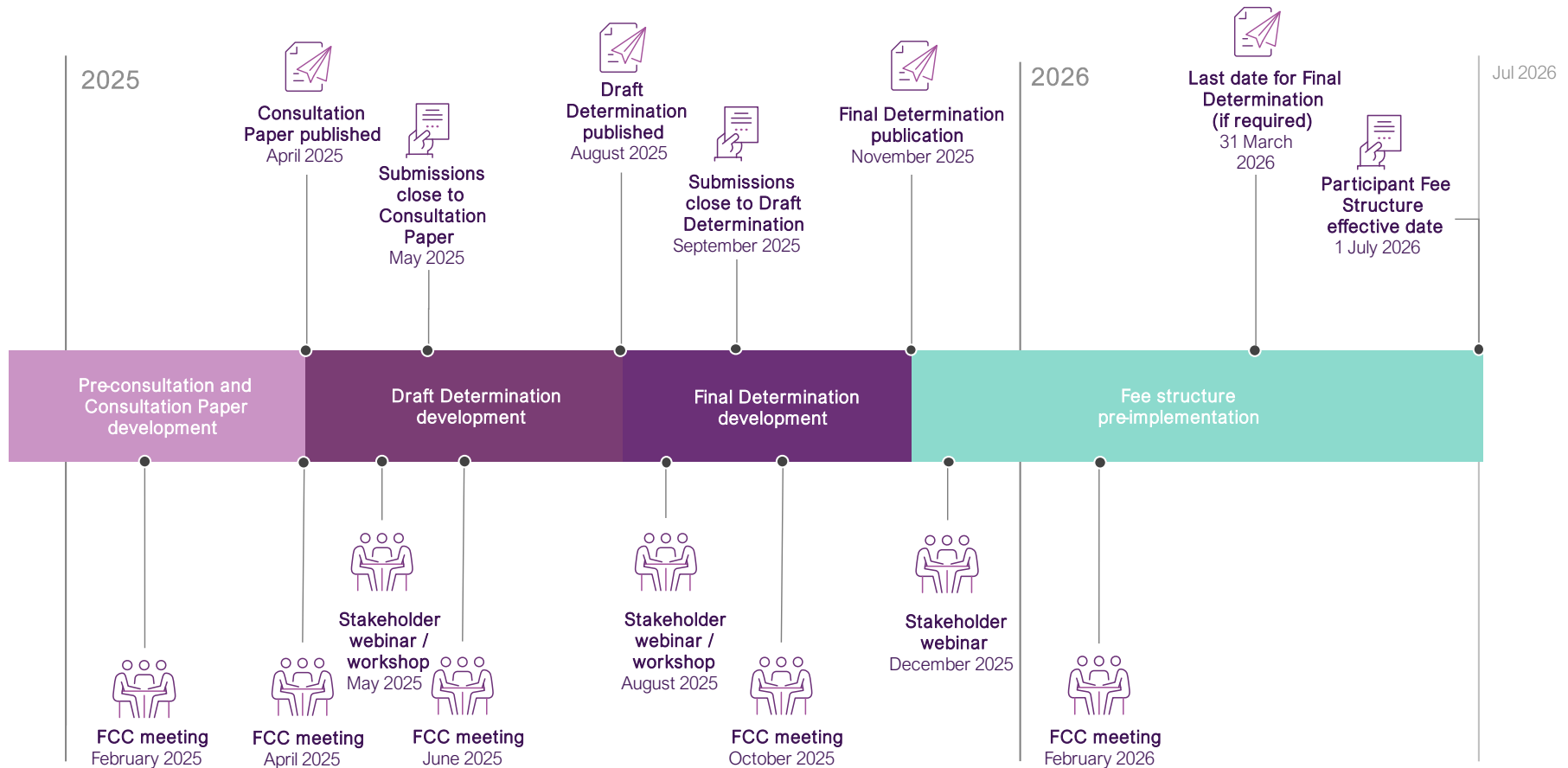
Table 4 Key stakeholder groups

Group	Key stakeholders
Consumers	<ul style="list-style-type: none"> Consumer and Community Reference Group (CCRG) Consumer Forum Energy Users Association of Australia (EUAA) Energy Consumers Australia (ECA)
Industry	<ul style="list-style-type: none"> Energy Networks Australia (ENA) and its members Australian Energy Council (AEC) and its members Clean Energy Council (CEC) and its members Clean Energy Investor Group (CEIG) and its members TNSPs DNSPs Generators Retailers Wholesale Customers
Governments	<ul style="list-style-type: none"> Commonwealth Government State Governments in the NEM (Qld, NSW, Vic, SA, Tas)
Market bodies	<ul style="list-style-type: none"> Australian Energy Regulator (AER) Australian Energy Market Commission (AEMC)

6. High-level engagement schedule

Formal consultation will commence in April 2025 and continue until 31 March 2026, with the finalisation of the fee structure at least three months prior to commencement (as required under the NER).

Figure 1 Participant Fee Structure Review Engagement Indicative Timeline



7. Evaluation

Table 5 Engagement metrics

What we are measuring	Success measures	Target	Measurement tool
Stakeholder engagement experience	Majority of stakeholders agree that the engagement experience was a meaningful and value accretive exercise.	>70% of surveyed stakeholders.	2 x stakeholder surveys – after close of submissions on the Draft Determination and after publication of the Final Determination.
Stakeholder engagement experience	Majority of stakeholders agree that they felt they had the opportunity to participate in the consultation, and that their views were meaningfully considered and responded to during the consultation process.	>70% of surveyed stakeholders.	2 x stakeholder surveys – after close of submissions on the Draft Determination and after publication of the Final Determination.
Transparency	Majority of stakeholders agree that the Consultation Paper, Draft Determination, Final Determination and communication materials gave them sufficient information and context to understand and participate in the fee structure consultation process.	>70% of surveyed stakeholders.	2 x stakeholder surveys – after close of submissions on the Draft Determination and after publication of the Final Determination.
Improved engagement from stakeholders	The consultation process engaged with all impacted NEM Registered Participant categories to the extent possible.	Participation from all impacted Registered Participant categories (e.g. Wholesale Participants, Market Customers).	Qualitative analysis of submissions and consultation participation.

AEMO

Level 12, 171 Collins Street, Melbourne VIC 3000

E: stakeholderrelations@aemo.com.au

aemo.com.au