

14 September 2023

Anna Collyer  
Chair  
Australian Energy Market Commission

Dear Ms Collyer,

**RE: AEMC's 3 August 2023 Directions Paper on Unlocking CER Benefits through Flexible Trading (ERC0346)**

Wattwatchers Digital Energy (Wattwatchers) welcomes the Australian Energy Market Commission (AEMC) Directions Paper on Unlocking CER Benefits through Flexible Trading, following the earlier ERC0346 Consultation Paper which we responded to in February this year (and which is cited in the Directions Paper in several places).

We appreciate this opportunity to provide further feedback, and Wattwatchers is broadly supportive of the direction being proposed. However, as a lean scale-up in the energy monitoring and metering sector, we have limited 'regulatory affairs' resources and thus are only making a brief response to the current Directions Paper.

We reaffirm our support for regulatory innovation in regard to the concepts of a 'minor energy flow meter' and a 'secondary market' behind the customer's meter. In our view, there is real merit for both of these concepts, and also many ways in which they can be expanded on and improved to deliver clear benefits to consumers, the electricity system, and the emerging marketplace for 'New Energy' solutions and services, including but not limited to real-time energy transactions and integration with smart home automation and features.

### About Wattwatchers

Wattwatchers has developed and operates a leading digital energy platform, in Australia and internationally, enabling fast, powerful and scalable solutions to monitor, analyse and control electrical circuits in real time – maximising the benefits from renewable energy, green building, and carbon and energy management.

Our solutions suite spans devices, datasets, analytics, software and Internet of Things (IoT) connectivity, for energy and non-energy applications across home, community, commercial and industrial, and utility use cases. Our open business model promotes technology collaborations, with dozens of third-party partner integrations with our REST API - in Australia, and internationally.

## Directions Paper questions

As stated above, Wattwatchers is broadly supportive of the AEMC's direction, and we appreciate that the AEMC is taking a more holistic approach to the numerous and interwoven issues that need to be resolved to unlock the benefits of CER.

We have limited our responses to the AEMC's questions in the current paper to the following:

*Q6. AEMO'S SPECIFIC FTM2 FOR SMALL CUSTOMERS - Do you agree with the Commission's view and its initial position to not progress further with AEMO's specific FTM2 for small customers?*

WW RESPONSE: Wattwatchers would urge the AEMC not to abandon reform in this regard at the small customer level. We note that the AEMC has held open the possibility of progressing a 'trial rule (i.e. 'sandboxing') for AEMO's proposed FTM2 for small customers, allowing for small customer outcomes, market functions, and costs to be better understood'. Wattwatchers supports such an approach and believe this would be consistent with, and capable of being supported by our product development roadmap (i.e. ultra-compact, billing approved metering for off-market use cases).

## *Q13. TECHNICAL REQUIREMENTS*

- *Do stakeholders have views on the removal or amendment of minimum service specifications for minor energy flow meters?*
- *Do stakeholders have views on inspection and testing requirements for minor energy flow meters?*

Wattwatchers notes that the AEMC has been prompted to consider this reform aimed at metering currently unmetered street infrastructure such as lighting and public barbecue facilities, in part at least, because manufacturers of such installations are now including metering in their designs. We highlight that alternative monitoring and metering solution providers, such as Wattwatchers, also have technologies that could provide real-time

performance monitoring and billing data for such facilities. Thus we welcome this potential precedent being raised, and we support the removal of the AEMC minimum service specifications for a future class of 'minor energy flow meters'. We also support streamlining of any inspection and testing requirements.

Thank you for this further consultation opportunity. Wattwatchers would welcome an opportunity to share more detail from our technology roadmap to relevant AEMC personnel.

Yours truly,

Gavin Dietz, CEO, Wattwatchers