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30 May 2024

Ms Anna Collyer
Chair
Australian Energy Market Commission
Sydney South NSW 1235

By online submission: ERC0378

Dear Ms Collyer

Draft Determination: Accelerating smart meter deployment

AEMO welcomes the opportunity to submit feedback on the Australian Energy Market Commission's (AEMC) draft determination on accelerating smart meter deployment, advancing the review of the regulatory framework for metering services in 2023. Following the draft determination's publication, AEMO has developed a high-level implementation assessment (HLIA) report outlining the schedule and timing of the procedural and system changes required to implement the final rule within the broader regulatory change roadmap. After consulting with interested parties on a draft HLIA, the document[1] is published on AEMO's website. This report provides AEMO's recommendations on the implementation timeframes for the final rule, based on the draft rule and determination requirements and feedback received during consultation.

In summary, the HLIA recommends adjusting the draft determination's timing requirements for procedures and systems to achieve the desired commencement date of 1 July 2025 for deployment acceleration. These adjustments would group deliverables into three stages:

- the first stage focuses on critical amendments necessary to enable deployment acceleration for the legacy meter replacement plan period (1 July 2025 to 30 June 2030), and AEMO is planning commencement of consultation on necessary procedures and systems in advance of the final rule and determination, with system changes deployed in May 2025;
- the second stage covers changes required to support the acceleration, with effective implementation of procedures timed to align with deployment acceleration commencement in July 2025; and
- the third stage aims to deliver enhanced outcomes post-deployment commencement, avoiding conflicts with the prior stages and risks to deployment acceleration commencement and ongoing progress towards replacement plan completion in 2030, and to enable the use of a new information exchange platform in 2026.

AEMO has reviewed the new and amended data required to be stored and made available via MSATS to various parties. AEMO is mindful of the need to adhere to Protected Information management requirements under the NEL and ensure the NER provides a clear and transparent operational framework. The inclusion of "defect" information presents challenges in this respect.

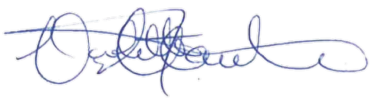
[1] https://aemo.com.au/initiatives/major-programs/metering-services-review---accelerating-smart-meter-deployment

AEMO does not consider "defect" information to fall under NMI Standing Data or Metering Data as currently defined. Amending either definition to include "defect" information would be impractical and likely result in unintended consequences. By nature, "defect" information is temporal and pertains to the customer's electrical installation, actions, or premises. AEMO believes that "defect" information should not be stored in MSATS, and interested parties should consider developing B2B transactions for this information.

If AEMO is required to store "defect" information and make it available to authorised parties, AEMO requests the AEMC provides further clarification on the operational framework in which this exists. This would include specifying the arrangements that will ensure AEMO can comply with Protected Information requirements and manage customer-related information appropriately, including considering implications under the Privacy Act, if any.

AEMO looks forward to continuing to work collaboratively with the Commission and industry on this rule change process. Should you wish to discuss any of the matters raised in this submission, please contact Kevin Ly, Group Manager - Reform Development and Insights at kevin.ly@aemo.com.au.

Yours sincerely,



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