



sonnen

Julia Cassuben
Australian Energy Market Commission (AEMC)
Level 15, 60 Castlereagh Street
Sydney NSW 2000
Submitted online 24 May 2024

24.05.24

RE: ACCELERATING SMART METER DEPLOYMENT ERC0378

Dear Julia,

sonnen Australian (sonnen) supports the AEMC in accelerating smart meter deployment because of the central role of smart meters in 'helping the electricity system become more intelligent, responsive, efficient and *customer-centric*.' sonnen understands consumer-centricity as key; our vision is a 'clean, affordable energy for everyone'. sonnen's experience is at the centre of implementing household DER/CER battery storage, and specializes in Virtual Power Plants (VPPs) with our global behind-the-meter expertise.

sonnen supports the fast-track rule change which is both 'ambitious and feasible', however we have a couple of key points for consideration as provisions (clauses), as below.

Key considerations

The suggested provision to ensure data equity to VPP providers as aggregators. sonnen notes that explicitly including OEMs and aggregators helps meet the AEMC objectives of this rule change, namely 'delivery for the consumer' and the decarbonisation objective (through orchestration of CER).

- 1) It is pleasing to see that customers will have access to their data **on request**. However, sonnen strongly recommends that **real-time data be made available to consumers**. To address asymmetry of data in the market, sonnen would like to see a provision for **aggregator as an agent appointed by the customer** in the clause below. However, rather than power quality, it is smart meter readings that are required to be able to assess data locally to control what is happening at the site. This real time connection may incur a very slight increase to the cost of meters, but this cost is reduced at scale. A real time port supports the two reforms in ERC0378, namely, on 1) New customer safeguards and 2) Improving the customer experience. From the CER perspective and how industry is evolving, having 'a single source of truth at the connection point' is desirable for houses with EV chargers, solar and batteries.

- 2) We recommend that **aggregators should have access to data similarly to DNSPs** and without cost, as they are acting in service of their customer. We cite the wording on page 138 of the Final Report, and encourage the intent: *'third-party systems or other intelligent electrical devices will be able to collect and analyse real-time data more quickly and effectively' ... Given this, we recommend that the regulatory framework for metering services should be purposeful about the obligations to **receive data and make data available, and should seek to establish a level playing field** for competition while safeguarding consumer interests.'*^{24.05.24}
- 3) We are wary that removing opt-out provisions under the current framework may back-fire with loss of social license with marginal gain (5-10%) as seen in lessons from California and the smart meter rollout failures in Victoria (c.2006).

For further consideration — suggested amendment of provision to the Draft Determination:

Clause 7.15.5 Access to energy data

After clause 7.15.5(c1), insert the following new provision:

(c2) Only the Local Network Service Provider **or relevant agent nominated by the consumer** in respect of a small customer metering installation and AEMO may receive power quality data for a metering installation.

Thank you for considering this submission, and the consideration of an amendment to clause 7.15.5(c1),

Kind regards,

Dr Veryan Hann

Regulatory & Public Affairs Manager

On behalf of Leonid Kukarin, Head of Operations, sonnen Australia.