

7 November 2024

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

By online submission: ERC0399

Dear Ms Collyer

### **AEMO Response to AEMC Consultation on Real-Time Data for Consumers**

AEMO welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC's) consultation paper regarding real-time data for consumers.

There are many use cases where the ability for consumers to access data will assist in making better informed decisions. Traditional requirements for physical displays on metering devices enabled consumers to check the accuracy of their energy bills. More recently, the Metering Data Provision Procedures and the Consumer Data Right arrangements have provided access to historic information (i.e. yesterday's data and before). These arrangements are designed to deliver outcomes based on clear, definable use cases. As noted in the consultation paper, retailer apps and other methods have evolved also. As consumer needs change and technology allows, it is timely to consider use cases and methods to obtain more immediate energy related data.

AEMO considers that in assessing various options, the AEMC should ensure that any requirements introduced do not interfere with the primary purpose of metering installations – accurately measuring energy for settlement, billing, and network operations – and that cybersecurity risks are minimised. AEMO emphasises the importance of maintaining this principle when considering the inclusion of real-time data provisions at all stages of the consultation.

AEMO provides responses to questions in the consultation paper in Appendix A.

AEMO looks forward to continuing its collaboration with the AEMC and other stakeholders on this important consultation. Should you wish to discuss any of the matters raised in this submission, please contact Hannah Heath Group Manager, Strategic Market Reform at [Hannah.Heath@aemo.com.au](mailto:Hannah.Heath@aemo.com.au).

Yours sincerely,



Violette Mouchaileh  
**Executive Group Manager – Reform Delivery**

### **Appendix: Consultation question responses**

## Appendix A - Consultation question responses

The consultation paper raises 12 specific questions for interested parties. AEMO is able to provide responses to questions 3, 5, 6, and 12 as below, noting that as specific use cases for real time data for consumers are developed, more fulsome and precise responses can be provided as the consultation process progresses.

### **Question 3:**

**a) Do you agree with the proponent that metering parties have a competitive advantage in providing services not related to their core functions of settlement, billing, and maintenance?**

**b) How would any competitive advantage impact the costs of new energy services to consumers?**

In consideration of these questions, AEMO notes that access to NMI standing data or metering data can only be provided to entities authorised under the NER. Further, AEMO understands that the provision of Power Quality Data is likely to be restricted in a similar way. As a result, metering parties are strictly limited in their ability to provide services not related to their core functions, where such a service would entail providing any of these data sources to another party.

### **Question 5: Who should have a right to real-time data in the NER?**

**a) Should consumers, their authorised representatives, or any other party, including DNSPs, have a right to access real-time data?**

AEMO suggests that the right to access real-time data in the NER should be considered if a clear need for access is identified and non-NER-based solutions are insufficient or prohibitively costly to meet that need.

The development of use cases related to real-time data should enable this matter to be evaluated within the scope of the consultation process.

### **Question 6: How should real-time data be defined?**

**a) Do stakeholders agree with the proposed definition of real-time data and customer power data?**

Consistent with the rule change proponent's paper, an optimal approach would be to first determine what is meant by "real-time" delivery. This would involve establishing a clear definition of real-time in terms of data transmission, latency, and frequency of updates. Once real-time is defined, the next step would be to determine what types of data should be delivered to that standard.

While the proponent identified the initial data set to be made available in real-time, the proponent importantly noted that the types of data required to be made available may change over time as technology and customer needs evolve.

### **Question 12: Do you agree with the proposed assessment criteria?**

AEMO considers it crucial that the primary purpose of metering installations—providing accurate data for energy settlement, retailer billing, and network billing—is not compromised, and cybersecurity risks are not increased by the facilitation of real-time access to data. To this end, AEMO recommends this matter be included in the assessment criteria.

### Other Matters:

- Corrections to Figure 2.2 on page 6 are necessary to clarify the framework for data provision and the roles of each data type, should it be used further in the consultation process:
  - Customers do not request historical *energy data* from retailers they can request *metering data* from retailers or their DNSP.
  - The following should be added under the DNSP box. “Receive metering data to calculate network charges”.
  - In Victoria, where DNSPs are the metering coordinator (MC) for end users with annual energy flows less than 160MWh, those DNSP MCs share metering data with retailers. As a result, there is no material difference worthy of noting in Victoria.
- There are existing methods for customers to access real-time data that are currently not considered within the scope of the National Electricity Rules (NER), referenced briefly in section 2.1.2 of the consultation paper. This includes devices made available in Victoria, via government’s Victorian Energy Upgrades program<sup>1</sup>. As these devices do not have a direct physical or communication link with metering installation components, they do not compromise the accuracy of the meter or its functionality, alleviating any cybersecurity concerns related to metering installations. Insights from customer take-up and use of energy monitors in Victoria could be valuable to the AEMC’s consideration of the proposed rule change.
- Provision of real-time energy information in the UK via their mandated provision of in-home-displays has caused some concerns, particularly for vulnerable customers. This primarily relates to anxiety caused by visible pricing and energy consumption rates. AEMO recommends the AEMC reviews the UK’s experience in this regard. Refer to the UK Citizen’s Advice Bureau for information<sup>2</sup>

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<sup>1</sup> <https://www.energy.vic.gov.au/victorian-energy-upgrades/products/in-home-display-discounts>

<sup>2</sup> <https://www.citizensadvice.org.uk/consumer/energy/energy-supply/your-energy-meter/using-the-energy-monitor-for-your-smart-meter/>