Australian Energy Market Commission

Level 15, 60 Castlereagh Street

Sydney NSW 2000

7th November 2024

Landis+Gyr response to real-time data for consumers (Reference: ERC0399)

Landis+Gyr wishes to thank AEMC for the opportunity to respond to its consultation paper on providing "Real-time data for consumers".

Our submission includes a general response to AEMC's consultation. First, we have included a short background to Landis+Gyr.

Background to Landis+Gyr

Landis+Gyr is the global industry leader in energy measurement solutions and advanced meter management for electricity, gas, heat and water utilities. Focused on quality, reliability and innovation, Landis+Gyr offers a portfolio of energy meter, network monitoring, load management, EV charging solutions, and associated management platforms, all of which enable utilities and end-users to use scarce resources efficiently, save operating costs and protect the environment by managing energy better.

General Response to "Real-time data for consumers"

Landis+Gyr supports the objective of local access of real-time data for consumers to enable better optimisation of Consumer Energy Resources (CER) and help reduce energy costs. We broadly support an industry consultation along with relevant workshops to ensure an outcome that delivers the intended value to consumers, whilst leveraging existing standards and devices associated with CER and interoperability.

Landis+Gyr provides metering solutions into the Australian market, with a variety of technologies that are leveraged by our customers today to manage flexible generation and loads that deliver cost savings to consumers.

As a metering solutions vendor, we are working with our customers to support the challenges arising from the energy transition. Initiatives such as real-time data for consumers are paramount to ensuring changes in energy usage are managed appropriately to maintain the reliability and security of Australia's energy network.

Further, Landis+Gyr note the outcome from this process should be outcomes based, to ensure solutions developed can benefit from technological advancements. With the acceleration of smart meters deployments in Power of Choice by 2030, the flexibility and timeliness of proposed changes by AEMC and AEMO are crucial to ensure such benefits are available to the majority of consumers.

We thank the AEMC for the opportunity to provide input into this consultation regarding real-time data access for consumers. We welcome the opportunity to engage in consultation further.

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Question 1: What are the benefits of improving access to real-time data?

a) What are the anticipated use cases of real-time data?
   ➔ Access to information for consumers to make more informed decisions.
b) What is the value of the benefits that flow to consumers?
   ➔ Guaranteed pattern-approved metering information.

Question 2: What are the costs of improving access to real-time data?

a) What are the types of costs that would be incurred to improve access?
   ➔ Additional costs would be associated with the following areas:
      - Coordination to provide access to the local data interface.
      - If not already available, the interface for local data access.
b) What is the magnitude of these costs?
   ➔ Insufficient information to be able to provide this.
c) Who would incur these costs?
   ➔ Further detailed discussions required.
d) Do the benefits of improving access to real time data outweigh the costs?
   ➔ Landis+Gyr can envisage that the benefits could outweigh the costs depending on the specific implementation.

Question 3: Do metering parties currently have a competitive advantage?

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?
   ➔ Metering parties have made investments into providing these services in a competitive market without being limited to core functions.
b) How would any competitive advantage impact the costs of new energy services to consumers?
   ➔ The ability for consumers to access new energy services should be made as simple as possible, with barriers removed, while keeping in line with the market setup.

Question 4: Do DNSPs need more than PQD to improve network planning and operation?

a) Do the benefits of improving DNSP access to real-time data outweigh the costs?
   ➔ Landis+Gyr do not have sufficient information to answer this in detail, however our experience in grid analytics and optimisation points to positive returns and outcomes in other jurisdictions.
b) What are the use cases for DNSPs and other network planners to have access to real-time data other than advanced PQD?
   ➔ Network model validation, meter to transformer mapping, phase identification, network planning, capacity planning, voltage performance, network anomaly detection, energy diversion, EV detection etc.

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?
   - ➔ Market participants will operate according to the market rules as reasonably set.

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?
   - ➔ Remote data may be in the order of 5 minutes, or down to 1 minute for a selection of endpoints and available within 30 minutes or higher. Local real-time data may be available at a higher rate.

b) What should be defined and/or further expanded in AEMO procedures?
   - ➔ Should be refined through consultation, for example key industry stakeholders should work together on a standardised data format.

c) Should data be validated or not?
   - ➔ Not if the data is provided locally.

Question 7: How should real-time data be accessed and shared?

a) Do parties, other than metering service providers, need to locally connect directly to the meter to access real-time data? If so, what changes are needed to enable this?
   - ➔ There are scenarios that this could be useful. Meters already have a defined physical interface for reading of meter data, if an additional interface is a requirement, then this should be carried out wirelessly based on latest technology advancements. Interfaces to external devices should minimise any additional external hardware or technology development to keep costs low.

b) Are there alternative data sharing arrangements that should be enabled by a rule change, if made?
   - ➔ Various options could be considered for providing alternative data sharing arrangements. However, to ensure a CER agnostic and consistent outcome for consumers at the lowest cost, we feel the metering solution is best positioned to offer access to data sharing.

Question 8: Who should bear the costs of accessing real-time data?

a) Should all consumers bear the cost of accessing real-time data?
   - ➔ The most appropriate commercial arrangement will depend on the scenario in which the meter data may need to be used.

b) What would be the benefits of a dispute resolution framework and how should it operate?
   - ➔ Minimum terms and conditions of access should be covered by the rule change, anything outside of this can be covered through a dispute resolution process.

Question 9: What changes would be required to ensure interoperability?

a) Would changes to the minimum services specification requirements be the most effective way to ensure interoperability of real-time data?
   ➔ Yes, with grandfathering, if it is deemed that a change is required.
b) Would any other changes be required to facilitate interoperability, for example, changes through device standards?
   ➔ Relevant existing standards in this area should be referenced to ensure harmonization.

Question 10: Do existing arrangements sufficiently protect consumer privacy and maintain cyber security for any real-time data framework?

a) Would any additional consumer privacy and cyber security protections be required if a real-time data framework were implemented?
   ➔ Relevant existing standards in this area should be referenced to ensure harmonization.
b) Do you consider other work programs could provide any additional protection required, such as the Roadmap for CER Cyber Security?
   ➔ Yes, as above, such as CER Data Exchange.

Question 11: What other changes would be required to enable a real-time data framework?

Would any other changes be required, for example to clarify data and storage arrangements or to implement relevant best practice features from other frameworks?

➔ We don't recommend changes that would add additional storage requirements. Once information is transferred it should be on the receiver to manage the storage and processing of data.

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

Are there additional criteria we should consider or criteria included here that are not relevant?

➔ We agree with the assessment criteria.