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Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Dear Sir/Madam

Re: Real-time data for consumers rule change (ERC0399)

TasNetworks appreciates the opportunity to provide comments in response to the Australian Energy Market Commission's (**AEMC**) consultation paper about the rule change request from Energy Consumers Australia (**ECA**) seeking to improve access to real time metering data for consumers and their authorised representatives. As the Distribution Network Service Provider (**DNSP**) in Tasmania, TasNetworks welcomes the consideration given by the AEMC in the consultation paper to the related issue of DNSP access to metering data in real time.

Question number four in the consultation paper asks if DNSPs need more than Power Quality Data (**PQD**) to improve network planning and operation. This submission identifies a number of operational use cases for real time metering data that will require more than PQD. DNSP access to that data will be key to the successful integration of Consumer Energy Resources (**CER**), enabling the Distribution System Operator (**DSO**) role and lowering the cost of the shared network for all consumers over time.

While network planning does not require the availability of real time data per se, the greater controllability of devices on the network that real time metering data makes possible opens up a range of operational solutions that will potentially impact on network planning, by providing non-network alternatives to traditional network augmentation. In this sense, the availability of real time data will provide more options for DNSPs to meet identified needs and improve network and customer outcomes.

Most of the use cases for DNSP access to real time data are operational in nature. Dynamic voltage control, dynamic operating envelopes and flexible export limits will all benefit from the availability of metering data in real time and will enable DNSPs to maximise CER hosting capacity. Network assets will also be able to be run less conservatively and more efficiently, with real time data and dynamic control enabling networks to be run with less headroom, which has the potential to reduce or delay expenditure on network augmentation. Fault finding and fault response would also both benefit from the availability of real time data, as

would the provision of customer outage and restoration notifications. Further, the availability of real time data would greatly enhance neutral integrity fault detection, both on network assets and at customers' premises.

While those use cases may to varying degrees rely on real time access to metering data, they do not all rely on the availability of a constant stream of data in real time, nor do they necessarily require real time data from every customer's meter. There are also some use cases which would require data more frequently than the five-minute timeframe suggested by the ECA in its definition of real time data availability.

It is important to note that giving consumers access to real time metering data by granting them access to smart meter communication ports, where they are present and / or enabled, would not facilitate the provision of real time data to DNSPs. DNSP access to real time meter data requires a centralised solution, involving Metering Data Providers, real time data pipelines and streaming applications, to provide DNSPs with access to a mix of streamed and event driven data, as well as the capability to interrogate select meters on demand.

TasNetworks agrees with the AEMC's assessment that DNSPs face barriers to accessing real time data on fair and reasonable terms. We also agree that denying or restricting DNSPs' access to real-time data will limit the ability to optimise network operation and planning. This is likely to lead to higher network costs to consumers than they might otherwise be, as well as constraints on consumers' ability to maximise the benefits of CER investment.

The AEMC's draft determination on the *Accelerating smart meter deployment* rule change (ERC0378) includes arrangements designed to overcome the commercial barriers, including high costs, that DNSPs have been facing in accessing PQD. TasNetworks considers that without similar provisions in relation to real time data, DNSPs will face inefficient costs in accessing real time data, costs that will ultimately be borne by consumers and diminish the net benefits that DNSP access to real time data has the potential to provide.

Once again, thank you for the opportunity to provide comments regarding the issues relating to improving access to real time metering data. To discuss the views expressed in this submission please contact Scott Lancaster, Senior Regulatory Analyst, at Scott.Lancaster@TasNetworks.com.au or 0417 467 099.

Yours faithfully

Chris Noye
Leader Regulation