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Anna Collyer
Chair of the Australian Energy Market Commission
Level 15
60 Castlereagh Street
Sydney NSW 2000

Reference code: ERC0399

Dear Ms Collyer,

Response to real-time data for consumers directions paper

AusNet welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (**AEMC**) directions paper on the real-time data for consumers rule change proposed by Energy Consumers Australia (**ECA**). The directions paper comes after an initial consultation highlighted that real-time data from smart meters is difficult to access and beneficial to consumers. The directions paper proposes obligations to make it readily available to consumers with:

- a definition of real-time data to clarify the service to be provided;
- a framework to enable access to real-time data from the consumer's smart meter; and
- a 15-year transition period to support real-time data being provided directly from the meter to the authorised appliance.

We, in principle, support the real-time data for consumers rule change on the basis it could improve participation of Consumer Energy Resources (**CER**) in demand side arrangements and flexible export arrangements with lower upfront installation costs. However, we consider that the proposed definition and expectations of interoperable multi-party real time access is difficult to provide customers with a convenient wireless service. The requirement to conveniently provide the below proposed real-time service is challenging and will test the capabilities of global metering service providers.

> "voltage, current and phase angle recorded every second and delivered within a second"

The proposed definition of real-time data access within 1 second may not be possible due to delays associated with the provision of real time data to multiple appliances or appliances that received delayed data from other devices i.e., wireless network repeaters. To support multi-appliance Wi-Fi access to real time data we suggest amending the definition of real time data to data received within 5 seconds of its measurement. Additionally, we strongly suggest working closely with the metering industry and global meter providers (e.g., L&G and Itron) to refine these requirements. At a minimum, we suggest amending the definition to providing:

> "voltage, current, and phase angle (or the combination of power factor and quadrant) measurements every second and sent within 5 seconds".

Additionally, we consider that real-time data coupled with distributed SCADA-like capabilities in smart meters (i.e., distributed intelligence), consumer appliances and distribution transformers will provide many exciting opportunities for grid participation that could support localised reliability services to manage network demand and possibly sustain islanding during a wider network outage. We believe the potential for this greater level of community participation and reliability improvement warrants reconsideration of consent requirements for sharing real time data with the DNSP, especially if this consent can be managed through a broader regulatory framework, such as connection agreements and network tariff conditions.

In support of this consultation, we provide responses to questions in the directions paper in Appendix 1.

If you have any enquiries, please do not hesitate to contact me on 0433691111 or justin.betlehem@ausnetservices.com.au.

Sincerely,

Justin Betlehem
Manager, Metering strategy and regulation

Appendix 1: responses to questions in the directions paper

Questions	AusNet response:
Question 1: Do you agree with a staged implementation approach for when consumers pay for access to real-time data?	In principle, we agree with a 15-year staged implementation approach and note our above concerns and suggestions with the proposed definition of real-time data access within 1 second may not be possible as discussed in our above letter.
a) Is 15 years the right time-frame for industry to achieve cost efficiencies in delivering real-time data access from smart meters? Are there ways to support industry to reduce this time-frame?	We agree that 15 years is generally the economic life of an electronic meter and represents a reasonable transition to a new physical meter specification change.
b) Would the marginal cost to each consumer be material in the long-term if costs were smeared across all consumers after 15 years?	This cost could be material, particularly if the requirement for real-time data within 1 second is maintained. The metering industry needs to undertake a detailed assessment of the changes required to provide real-time data to consumers and their appliances.
c) Are there other ways to facilitate efficiency and equity and support industry to lower costs to consumers?	We only suggest changing the definition of real-time data access and not any other ways to facilitate efficiency.
d) What incentives would our approach create for retailers, MSPs and third parties?	The proposed approach for real time-data only supports distributed intelligent controlled devices at the customer premises (whether they are the inverter, EV smart charger, HVAC or the meter). This limits participation to the owners of these devices. However, the lack of real time data for DNSPs would limit the ability for the network to adapt, respond and repair at the distribution transformer level (e.g. maintain a self-sustaining distribution transformer island during an HV outage). Distribution transformers will also eventually have capabilities to include real-time data, but this reform would appear to be short-sighted in excluding customers from this level of community participation that could provide significant improvement in network reliability.

Question 2: Should the prices for real-time data access be published by the AER?	We present no views on whether prices for real-time data access should be published by the AER.
a) How and where should the AER publish prices to access real-time data?	See response to question 2 above
b) What other measures would incentivise retailers to offer real-time data at competitive prices?	We consider that the success of real time data access is dependent on the value and deliverability of the service, which is defined in this rule change. If the service is readily achievable by the metering industry and valued by the market and customers, then retailers will actively compete. If the service definition is unviable for metering service providers, retailer prices will reflect the high costs of bespoke solutions for the Australian National Electricity Market. Additionally, if the service definition is difficult for customers to access (i.e., needing a physical wire to the meter) then customers are also unlikely to embrace real time data solutions and high prices to access these services. For these reasons, we consider that AEMC should define this service cognisant of meter service provider costs and easy, convenient access for customers.
Question 3: Do you agree with our proposed definition of real-time data?	We suggest amending the definition to providing: "voltage, current, and phase angle (or the combination of power factor and quadrant) measurements every second and sent within 5 seconds". The amendment includes: - removing reference to the word "recorded" to avoid excessive memory storage requirements; - an explicit allowance for power factor and quadrant measurements instead of just allowing phase angle; and • an additional allowance of 5 seconds sending time to provide a reasonable allowance for delays introduced by sending the data to multiple devices and other delays.

a) Does the proposed definition enable real-time data products and services to deliver the benefits of real-time data to consumers?	We consider there is a risk that the proposed definition is incompatible with wireless technology solutions that are much more readily incorporated in customer premises.
b) What other features of a real-time data definition should be described in AEMO procedures?	We consider that the definition of a real-time data service be complete and not subject to change with AEMO procedure changes. The definition should define what quantities are provided, when they are recorded, and for each record what latency requirement applies.
Question 4: Do you agree with the obligation on retailers to provide real-time data access?	
a) Are the proposed timeframes of 10 business days and 20 business days sufficient to enable retailers to give customers access to real-time data?	Notwithstanding potential issues with the definition of real-time data outlined above in our response to questions 1 and 3, we consider the proposed timeframes of 10 and 20 business days are similar to other meter installation and replacement obligations and would be reasonable.
b) Are there circumstances where the obligations on retailers to offer and give real-time data access upon customers' request, and the timeframes within which to give access should not apply?	In circumstances where a meter replacement is delayed due to shared fusing, or a safety defect, we consider the timeframe should not apply.
c) Are additional obligations on retailers required to enable the provision of real-time data access to consumers?	We present no views regarding additional obligations on retailers to enable the provision of real-time data access to consumers.
Question 5: Do you agree that MSPs should ensure multi-party, interoperable and secure access to real-time data?	We agree that MSPs are best placed to provide access to real-time data to the customer and authorised third parties.
a) Are there requirements that we should impose on MSPs in addition to multi-party, interoperable and secure access obligations?	We consider that providing real-time data to any party or device from the meter could be challenging. While we, in principle, agree with aligning with national or international standards where possible, we consider that a requirement for interoperable real-time data access is not warranted. All such data access should be secure.

Question 6: Which consumer consent pathway do you consider to be the most practical and why?	We consider the MSP-centered pathway to consumer consent provides the most direct and efficient access to real-time data access. However, this process needs to conclude with a notification to the customer's retailer for the purpose of billing the initial establishment costs and tracking which parties access to their customers' real time data.
a) Are there any barriers to implementing this pathway?	We offer no suggestions on what would prevent this pathway.
b) Are there any viable alternative pathways that better deliver outcomes for consumers?	We offer no suggested alternative pathway other than the above inclusion of a notification to the retailer confirming real time data was requested by the customer and is being provided to the customer or the third party.
Question 7: What should third party access consent look like?	
a) Should the form of consent be left to third parties to determine?	We suggest the information provided on a third-party access consent form should represent: - The correct and authorised customer is the party providing the authorisation. • The customer understands that the MSP provides access to the meter's real time data, and the retailer may charge them a once-off fee to establish this capability. - The customer provides explicit informed consent for the third party to receive real time data.
b) Should there be specifications placed on the form of consent that third parties must obtain from consumers? If so, what could this look like?	We suggest that broader principle-based rules would be adequate and more efficient than a consent form specification.
c) Should the process for the withdrawal of consent also be specified?	Withdrawing consent should mirror the initial consent process, noting the Australian Privacy Principles and the Privacy Act 1988 would apply and may affect additional consumer protections to the withdrawing consent process to enhance privacy outcomes for consumers.

Question 8: Should additional requirements be placed on third parties that request access to consumer data?	
a) Should third parties be accredited by AEMO under the NER?	Because real time data access is proposed as every second within a second, we consider that the data would only readily be provided locally either with a wired or wireless technology. Consequently, the parties receiving real-time data would already be participating in the NEM. They would either be operating appliances within the customers' premises or a Network Service Provider that could be, in the future, receiving real time data directly at nearby distribution substations-. In either case, they would be acting as an agent of another Registered Participant and subject to the National Electricity Rules. We suggest, therefore, it would be unnecessary to accredit these third parties that are already participating in the National Electricity Market in various capacities (e.g., small generator aggregator, retailer, NSP, accredited data holder under the Consumer Data Right, demand response service providers, voluntarily scheduled resource providers).
b) Are there any other safeguards required to ensure third parties do not misuse data?	We suggest retailers provide the list of ongoing, authorised data recipients (including those of real time data) on the customer's electricity bills. This obligation should only apply to those data recipients authorised by the current retailer or prior retailers for the customer.
Question 9: What features of the consumer data right (CDR) can we adopt?	
a) What specific features of the CDR would be beneficial to apply to third parties who seek access to real-time data?	We consider that the 1 second latency and localised nature of the real-time data precludes any extension to the consumer data right arrangements.