



20 February 2025

Australian Energy Market Commission

Submission via website: [www.aemc.gov.au](http://www.aemc.gov.au)

**Re: ERC0399 – Real-time data for consumers**

CitiPower, Powercor and United Energy welcome the opportunity to respond to the Australian Energy Market Commission's (AEMC) directions paper regarding real-time data for consumers.

Our key feedback is presented below in response to the consultation questions.

**Question one: Do you agree with a staged implementation approach for when consumers pay for access to real-time data?**

Yes, we support a staged implementation approach to the availability of real-time data. A staged implementation approach allows for a prudent and orderly replacement of our existing smart meter fleet. Our current smart meter fleet is unable to provide one second power quality data nor the provision of real-time data to customers within one second via WiFi.

A staged approach is more in line with our customer's preferences given there has been low levels of interest to date for accessing real-time data. Notwithstanding, for customers who are seeking real-time data to be provided to them earlier than allowed through the staged implementation, we support the ability for these customers to access services through an approved alternate control charge to be determined by the AER.

Further, we note that the proposed 15-year implementation timeline also reflects the current regulatory life assigned to smart meter assets by the Australian Energy Regulator (AER) and is therefore consistent with current regulatory treatment.

As part of our 2026-31 regulatory proposals, our networks have proposed a proactive replacement of our existing smart meter stock over multiple regulatory periods commencing in 2027. If approved by the AER, the replacement program would be completed in alignment with the proposed staged implementation. However, to enable the program, the Victorian Government will need to amend the Victorian Advanced Metering Infrastructure (AMI) Metering Specification to permit WiFi capability.

**Question two: Should the process for real-time data access be published by the AER?**

We support customers who seek to have real time data provided to them earlier than allowed through the staged implementation process by being able to access these services through an approved alternate control charge to be determined by the AER.

The determination of the charge should be determined in Victoria through the existing regulatory determination processes and annual pricing proposals.

**Question three: Do you agree with our proposed definition of real time data?**

Throughout our extensive customer engagement program, we engaged with customers through different forums on what their key priorities were in terms of their energy supply. Real time data access was not a prominent finding during this engagement. As such, the proposed definition of delivering data within one second appears to be overly ambitious relative to our knowledge of customers preferences. In saying this, we appreciate the long-term view of the rule change, and the challenge of predicting customer preferences in 15 years' time. As such, we accept the definition within this context and recommend the AEMC provide information on the analysis used to help inform customer preferences over the long term.

We recommend the AEMC consider the format of the data. To ensure consistency across the industry, we recommend a new standard or reference to a new standard.

In the directions paper, it is noted that the specifics of the data definitions will be prescribed in the Australian Energy Market Operator (AEMO) procedures. AEMO procedural changes typically define our costs to comply. As such, it is important that there is a transparent and timely process between all relevant parties to finalise the AEMO procedural changes. This is because without these procedural changes and the estimated flow-on cost impact to industry participants, there will not be accurate and holistic consideration of the costs and benefits of the proposed rule change.

**Question four: Do you agree with the obligation on retailers to provide real time data access?**

In Victoria, all smart meters are owned, maintained and operated by distribution networks. Distribution networks are also the exclusive metering co-ordinator for smart meters. Therefore, in a Victorian context, the AEMC should explicitly recognise that the obligation to provide real time data access to customers with smart meters resides with the distribution networks. Providing this clarity will avoid unnecessary confusion to the process of requesting real time data.

In terms of the proposed service levels, we believe these should be the same as our existing in-home display pairing service. That is, it can be automated through a customer portal in which case the performance standards should be achievable. The exception to meeting the proposed service levels will include meters without WiFi capability as it will not be able to connect to the internet to send usage data within one second. In addition, legacy meters without remote communication capability will also be unable to do so.

Further, it is important to recognise that in Victoria we have meter testing requirements that necessitate meters to be offline for a time. Consideration must be given to performance standards of this period and any potential liabilities taken by third parties or customers whilst their meter is being tested.

**Question five: Do you agree that meter service providers should ensure interoperable and secure access to real-time data?**

We are comfortable that meter service providers, which are the distribution networks in Victoria, have responsibility for ensuring secure and interoperable access to real time data. Provided data access is through Wi-Fi, which is what we are proposing in Victoria, we do not see any material issues.

However, the AEMC should note there will be costs associated with interoperability and security. These include security design, monitoring and updating firmware/hardware to ensure that access is controlled, and the device cannot be compromised. For example, over a 15-year asset lifecycle the version of Wi-Fi protocol that needs to be supported may change numerous times. There will also be identity management and audit tracking to manage third party access and finally updates to central systems to enable and disable meter features like the current binding process for Zigbee.

Further, we foresee that there may be some IT mobile application development required to authenticate and retrieve data securely from smart meters and to take the correct data from the smart meter and to allow third parties to access data safely and securely.

**Question six: Which consumer consent pathway do you consider to be the most practical and why?**

In a Victoria context, networks will perform the role the AEMC envisages for both retailers and the meter service providers. Therefore, in Victoria the two pathways equate to the same outcome.

**Question seven: What should third party access consent look like?**

Third party access at the scale being envisaged by the AEMC would require development of a customer portal able to handle requests, quotes, acceptance and on-going support. For example, today we pair in home displays through our MyEnergy portal, but this would need to be expanded to manage real time data requests.

Third party access consent must be carefully considered, including the customer protection frameworks in place to ensure customers are sharing in the forecast benefits of the proposed rule change.

**Question eight: Should additional requirements be placed on third parties that request access to consumer data?**

No comment currently.

**Question nine: What features of the consumer data right can we adopt?**

No comment currently.

Should you have any queries, please contact Lauren Fetherston on 0499 202 244 or [lauren.fetherston@ue.com.au](mailto:lauren.fetherston@ue.com.au).

Yours sincerely,

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