



24 February 2025

Ms Anna Collyer
Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Lodged electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Ms Collyer,

RE: REAL-TIME DATA FOR CONSUMERS – DIRECTIONS PAPER

Origin Energy (Origin) appreciates the opportunity to provide a submission to the Australian Energy Market Commission's (AEMC) Real-time data for consumers – directions paper (ERC0399).

We agree that the increased availability of real time data is important in supporting greater innovation and better customer outcomes. In time, this data will drive better coordination and optimisation of consumer energy resource (CER) assets and devices which in turn will deliver more consumer-friendly product offerings and the more efficient use of infrastructure.

We support the AEMC's decision to allow for a staged transition to universal access over 15 years. However, we are concerned about how several proposed interim arrangements will work in practise. While real-time data may be useful to retailers and other parties to deliver more precise responses to price signals and to refine products, it is not clear whether the immediate benefit of requiring this information directly to be provided to customers outweighs the costs.

The vast majority of residential customers want simple, cheaper electricity. They want less complexity and prices they can understand. Over time we expect that service providers are more likely to optimise a customer's CER on their behalf and to translate this into a simpler product offering. These arrangements will be underpinned by open standards-based protocols and communication interfaces to enable the interoperability of real-time data from smart meters to recipients.

The most prevalent cost reflective retail price signals customers currently face are time of use retail tariffs. These provide consistent price signals over the same time blocks each day. Customers can effectively respond to these signals with the information that is currently available to them. Recent moves to introduce more cost reflective tariffs were met with a significant push back by customers resulting in some networks softening their tariff structures (e.g. Energex) and the changes to informed consent arrangements relating to the installation of a new smart meter.

On that basis, we are concerned about how this proposed rule translates to an individual customer who seeks their real-time data, whether there is any actual benefit, and the implications for their retailer.

For example, if a customer requested their real-time data from their retailer, how would this operate in practise. It is our understanding that the customer would need a device to enable the receipt of this information noting it would involve vast amounts of real-time data. Where a customer did not have the ability to receive this information, or receive it in a meaningful way, is it the AEMC's expectation that the retailer would provide the customer with this data in a digestible manner; say through their customer account portals?

If this was the case, this would effectively require a retailer to provide the customer with a live stream of their usage. While we have not undertaken costing to deliver this functionality, we would expect it would be material. Notwithstanding, the customer is unlikely to realise any additional benefit relative to the information that is currently available to them.

We believe it will be the customer's agent that will largely seek real-time data and it will be most valuable to these entities as they optimise usage and services on the customer behalf. However, we recognise that some customers may want to engage with the data themselves. It is vitally important that the AEMC make it clear how this will work in practice from a customer's perspective, what the obligations are on the customer and the retailer in providing this information, and who bears the costs of not just the upfront installation of enabling infrastructure but the ongoing delivery of information.

While we support, the proposed transition timeframes, given the evolving nature of the market it may be prudent for the AEMC to revisit the effectiveness of any proposed rule in say five years to ensure any current decision remains relevant.

Origin's response to specific questions raised by the AEMC are set out below.

Staged implementation

We support the proposed staged approach to implementing universal access to real-time data from the smart meters over a 15-year period. We agree that this will minimise the infrastructure costs by aligning the implementation with the average physical life of a smart meter.

Publishing the cost of access to real-time data

We support the publication of costs for infrastructure upgrades to enable access real-time data. This could be provided on a retailer's website. To the extent there are ongoing delivery costs these could also be provided on a retailer's website.

Defining real-time data

We support the AEMC proposed definition of real-time data as "voltage, current and phase angle recorded every second and delivered within a second". We also support that real time data will not be validated.

Consumer consent

Ensuring that customers retain control over access to their data is vital. We believe a retailer-centred pathway would deliver a more effective and efficient consent model. This process is already established and governed under the Natural Energy Law. Retailers have existing processes and governance models in place, and we believe these could be reasonably extended to capture customer consent for the access to their real-time usage data.

We also believe that third parties should have accreditation to access a customer's data. It is vital that any party receiving a customer's data is a fit and proper person and can demonstrate understanding of privacy and cyber security requirements.

Retailers to provide real-time data access

In terms of costs, the AEMC has proposed that retailers can charge consumers a once-off fee for access to real-time data for 15 years from the commencement of any rule made. We understand this fee can be recovered over multiple bills or other contractual arrangements agreed between the retailer and the customer. We think this is appropriate to enable retailers and meter serve providers to recover the capital costs of any infrastructure upgrade.

While this will enable access to data, how the costs of the delivery of the data in real time are to be recovered has not been adequately considered.

Remote access relies on telecommunications which would need to deliver large volumes of data in real-time. Furthermore, the data needs to be provided in an understandable and usable format to consumers and authorised third parties. There needs to be a clear understanding from the customer's perspective about how they will receive this data, whether they need to invest in appliances to receive this data, and how this can benefit them – especially when compared to what information they already receive and what price structures they are paying.

We think it is vitally important that the policy makers clearly set out how they think their decisions will deliver improvements to customers given current pricing arrangements and clear customer preferences for simplicity not complexity.

If you have any questions regarding this submission, please contact me at sean.greenup@originenergy.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Greenup', written in a cursive style.

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