

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

5 March 2025

Submission on Real-Time Data for Consumers – Directions Paper

Reference: ERC0399

Dear Ms. Collyer,

Rosetta Analytics appreciates the opportunity to provide input on the AEMC's Directions Paper regarding real-time data for consumers. As a leader in energy data intelligence, Rosetta Analytics has been instrumental in helping to democratise energy network information on behalf of the significant Transmission Network Service Providers (TNSPs) and Distribution Network Service Providers (DNSPs) via our spatial mapping portals.

Our commitment to transparency and accessibility in the energy sector closely aligns with the objectives of this consultation. We strongly support expanding consumer access to real-time data and recognise its potential to improve energy efficiency, enhance demand response, and foster a competitive and consumer-centric energy market.

Question 1: Do you agree with a staged implementation approach for when consumers pay for access to real-time data?

While we acknowledge the proposed 15-year transition, we encourage exploring mechanisms to expedite universal free access, such as industry innovation incentives or regulatory support to reduce costs earlier.

a) Given the rapid advancements in smart metering technology, a 15-year transition is unnecessarily long. A 5–10-year target would better align with consumer interests and industry capabilities.

- b) If real-time data integration becomes standard practice, the marginal cost spread across all consumers after 15 years should be minimal. Early investment in cost-effective solutions will help mitigate future financial burdens.
- c) Alternative mechanisms, such as government incentives, regulatory cost caps, or competitive grant programs, could help reduce consumers' costs while expediting adoption.
- d) The proposed approach encourages retailers and MSPs to optimise deployment strategies but may create short-term disincentives if initial infrastructure costs are high. Regulatory oversight and market transparency will be crucial in prioritising consumer interests.

Question 2: Should the prices for real-time data access be published by the AER?

We support publishing prices as a transparency measure.

- a) The AER should publish prices in a standardised, easily accessible format on its website, alongside annual reports detailing industry progress towards universal access.
- b) Additional incentives could include regulatory benchmarking, financial incentives for retailers offering competitive pricing, and consumer education campaigns to promote informed decision-making.

Question 3: Do you agree with our proposed definition of real-time data?

We support the proposed definition, although we recommend that further details be specified.

- a) The definition effectively supports real-time energy products and services but should specify that access should be available through multiple digital interfaces and standardised formats.
- b) Procedures should outline technical specifications for data transmission formats, security protocols, and latency thresholds to ensure seamless integration across industry stakeholders.

Question 4: Do you agree with the obligation on retailers to provide real-time data access?

We support the retailer's obligation, although we suggest refinements to improve its implementation.

- a) The proposed 10–20 business-day timeframes are unnecessary, as real-time data access should be instant. With modern data processing technologies, there is no justification for delays or reliance on static exports.

b) Exceptions, such as delays caused by infrastructure constraints outside the retailer's control, should be clearly defined.

c) Additional obligations may include requirements for retailers to inform consumers about real-time data benefits and access processes proactively.

Question 5: Do you agree that MSPs should ensure multi-party, interoperable and secure access to real-time data?

We agree that MSPs should provide multi-party, interoperable, and secure access.

a) Additional requirements should include standardisation of API access, cybersecurity protocols, and periodic compliance reviews to ensure interoperability across service providers.

Question 6: Which consumer consent pathway do you consider to be the most practical and why?

We recognise the benefits of a retailer-centred model and advocate for a parallel system where consumers can directly authorise trusted third-party access to their data, ensuring competition and accessibility remain at the forefront.

a) The main barrier is ensuring retailers act impartially and do not prioritise their own data-related services over third-party providers.

b) A hybrid approach allowing direct consumer authorisation through secure online platforms could improve efficiency and flexibility.

Question 7: What should third party access consent look like?

We recommend structured consent protocols.

a) Standardised consent frameworks should be established rather than leaving this to third parties.

b) The consent form should be clear, informed, and revocable, with explicit consumer opt-in mechanisms.

c) A streamlined withdrawal process should be defined, including a notification system to consumers confirming data access revocation.

Question 8: Should additional requirements be placed on third parties that request access to consumer data?

Consumers should be able to opt into any third-party service via secure API connectors, ensuring flexibility, competition, and innovation in the market. Rather than imposing restrictive Accreditation requirements, safeguards should focus on transparency, consumer-controlled permissions, and precise opt-in/opt-out mechanisms.

a) No, third parties should not be required to be accredited by AEMO under the NER. Instead, a consumer-driven consent model should be implemented, where consumers can authorise third-party access directly through secure digital authentication processes.

b) Yes, safeguards should be in place to ensure consumer data is protected. These should include robust API security standards, transparent data usage policies, consumer-controlled permissions, and a clear and simple opt-out process. Regular monitoring and enforcement should focus on adherence to these principles.

Question 9: What features of the consumer data right (CDR) can we adopt?

We support leveraging CDR principles.

a) Key features to adopt include standardised API access, data-sharing consent frameworks, and interoperability with existing CDR-compliant platforms to ensure consistency across industries.

Commitment to Consumer Access

Rosetta Analytics strongly supports a consumer-centric approach to real-time data access, recognising its transformative potential in enabling smarter energy decisions, enhancing market competition, and optimising demand-side energy management. We encourage the AEMC to consider measures to accelerate implementation, improve transparency, and ensure fair and secure access for all stakeholders.

We appreciate the opportunity to contribute and welcome further discussion to improve consumer access.

Sincerely,

A handwritten signature in black ink, appearing to read 'A Quattrone', written over a horizontal line.

Dr. Anthony Quattrone
Managing Director
Rosetta Analytics Pty Ltd