

Julia Cassuben  
Australian Energy Market Commission  
GPO Box 2603  
Sydney NSW 2000

30 May 2024

**RE: Accelerating smart meter deployment – Draft Determination (ERC0378)**

Dear Julia,

Tesla Motors Australia, Pty Ltd (Tesla) welcomes the opportunity to provide the Australian Energy Market Commission (AEMC) with a response to the draft determination of the Accelerating smart meter deployment rule change (Draft determination). As recognised through the extensive consultation process to date, metering is a critical topic and should be considered within the suite of emerging market trends and policy changes for consumer energy resources (CER). In our response below, we have provided a number of observations and suggested considerations that should be included within the scope of the final determination.

**Communication strategy must continue to ensure consumer centrality to CER transition**

Commonly, customers are encouraged by consumer advocates and Energy Ministers alike to shop around to get the best deal in a competitive energy retail market. Both Energy Made Easy and Victorian Energy Compare operate as free, trusted, and independent websites that allow customers to evaluate energy deals from all retailers in the market and make informed choices. However, even the Chair of the Australian Energy Regulator (AER), who runs the comparator site, still found it 'complex and confusing' to shop around, leaving her not certain that she found the best deal for her relative.<sup>1</sup> It is imperative that this tool continues to communicate complex information in a simple and clear manner as energy offers start to become increasingly complex by finding new ways to provide value back to customers.

For example, based on the current filter options on Energy Made Easy, if a customer wanted to see a 'special offer' included in a plan it would require them to select a filter to 'only display plans with special offers'. The customer is then required to click on each 'special offer' drop down under each of the multiple available plans to see what is being offered. This does not allow for an easy comparison or comprehension of what is being offered and how it may impact their bill. Additionally, neither the AER nor the ESC's websites do not have any educational material on how CER may have an impact bills.

---

<sup>1</sup> <https://www.aer.gov.au/news/articles/news-releases/towards-energy-equity-opinion-piece-aer-chair-clare-savage>

Energy Ministers have also recently committed to driving CER reforms through a National CER Roadmap and by establishing a new CER Taskforce. This was further reinforced through additional funding in the latest budget, committing funding towards the taskforce. As governments and ministers across Australia are collaborating on efforts on multiple fronts to increase CER integration and unlock the value it can provide the customer, it is vital that our traditional tools and educational material continue to keep pace. We understand that the AEMC has stood up an industry working group, as well as a jurisdictional working group to develop a customer-centric communication strategy to promote the accelerated roll out. Tesla is very supportive of this work and believe building social licence throughout the energy transition is critical at every stage. We recommend that the AEMC work with the AER and the Essential Services Commission to initiate a review and update to Energy Made Easy and Victorian Energy Compare to ensure offers can be displayed in a way that is meaningful for customers.

**Any data framework should clearly identify issues and customer benefit**

Device management is essential to the safe and effective operation of a customer's installation, and the grid. The AEMC's Final Report recommends the establishment of an enabling framework for customer access to real-time data and to consider interoperability as a matter of performance when sharing real-time data, encouraging participants to adopt standards. We note the AEMC's draft determination encourages an additional rule change be submitted regarding the Review's recommendations regarding real-time data. Tesla recognises the ongoing work program and commitment from Energy Ministers to consider enabling technology that will be required to support systems operating in high CER contexts.

From the ESB's Wrap Up Report, we understand that the ESB's advice on interoperability, together with the cost benefit analysis and advice on public key infrastructure and CSIP-Aus, is intended to be finalised and provided to the CER Working Group to support consideration of next steps on interoperability requirements for CER. Reform debates today around interoperability focus on the obligation on the device to comply with data protocols and have not extended to clear articulation of obligations on any parties which are communicating with the device. Any policy and regulatory work in this space should look to balance the roles and responsibilities, as well as the types of control being introduced. Recognising them as both mechanisms to deliver grid benefits and any impacts they may have on the performance of the customers asset, one that they have individually invested in.

Tesla welcomes supporting the AEMC throughout the final stages of this rule change and any following process. Please contact Emily Gadaleta ([egadaleta@tesla.com](mailto:egadaleta@tesla.com)) with any questions or follow-up.

Sincerely,

Tesla Energy Policy Team  
[energypolicyau@tesla.com](mailto:energypolicyau@tesla.com)