

19 February 2025

Ms Anna Collyer
Chair
Australian Energy Market Commission
Sydney South NSW 1235

By online submission: ERC0399

Dear Ms Collyer

AEMO Response to AEMC Directions Paper on *Real-Time Data for Consumers*

AEMO welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC's) Directions Paper for its rule change project titled Real-Time Data for Consumers.

Noting that the Directions Paper makes several references to the creation or expansion of AEMO procedures, it will be necessary to ensure that any such requirements are clearly defined to allow sufficient time for procedure development, consultation, and implementation. This will require consultation on AEMO procedures in accordance with the Rules consultation procedures specified in the National Electricity Rules (NER). Given that changes are likely to be needed to the Metrology Procedures, AEMO notes that the NER requires a minimum three-month period between Metrology Procedure publication and implementation that would need to be accommodated.

Implementation timing may also need to consider system changes, for example to provide visibility of the establishment of "real-time data facilities" at a connection point within market systems and processes. If such changes are required, they would need to be considered in conjunction with the broader list of initiatives delivered via the NEM Reform Program as outlined within the NEM Reform Implementation Roadmap¹.

AEMO notes that Section 6 of the Directions Paper (and the associated Questions 6-9) discusses access rights to data and processes that could support third parties in accessing real-time data from metering installations when authorised by the consumer, including the potential for AEMO accreditation. The National Electricity Law and NER provide clear controls on which parties can access specific types of data, both current and historical. It appears reasonable, therefore, to consider the processes necessary to introduce a new access party within this framework – provided that obtaining access would be a mainstream and commonplace activity, as suggested in the Directions Paper.

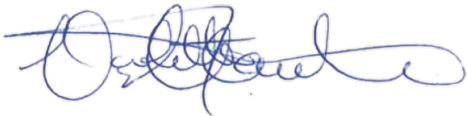
Accreditation of "data access parties" (i.e. a party authorised by a customer, rather than a market participant) via AEMO processes (as distinct from CDR accreditation, which is discussed separately in the Directions Paper) is likely to require both initial and ongoing assessments to confirm competence, capability, and continued compliance with the rules – similar to the requirements for current accredited party roles. AEMO is keen to assist the AEMC and participants in exploring this option further and in considering whether accreditation can provide sufficient assurance of appropriate data access and data use within the consultation process.

¹ <https://aemo.com.au/initiatives/major-programs/nem-reform-implementation-roadmap>

If progressed, AEMO recommends that the AEMC consider how best such a new role might access data, including but not limited to locally obtained real-time data. For example, such an arrangement could simplify access to historical energy usage data obtained via the Metering Data Provision Procedures.

AEMO looks forward to continuing its collaboration with the AEMC and other stakeholders on this important consultation. Should you wish to discuss any of the matters raised in this submission, please contact Hannah Heath, Group Manager – Strategic Market Reform, at hannah.heath@aemo.com.au.

Yours sincerely,



Violette Mouchaileh
Executive General Manager – Reform Delivery