20 February 2025

Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney  NSW  2000

Dear Sir/Madam

**Re: Real-time data for consumers rule change (ERC0399)**

TasNetworks appreciates the opportunity to provide comments in response to the Australian Energy Market Commission's (**AEMC**) *Directions paper* about the rule change request from Energy Consumers Australia seeking to provide access to real time metering data for consumers and their authorised representatives.

When the Consultation paper about the "*Real-time data for consumers*" rule was published in October 2024, as the Distribution Network Service Provider (**DNSP**) in Tasmania, TasNetworks was encouraged by the consideration given by the AEMC to the related issue of DNSP access to metering data in real time  In addition to enabling access to energy usage information in real time, the Consultation paper envisaged smart meters playing a crucial role in helping the electricity system become more intelligent, responsive, efficient and consumer centric.

The Directions paper largely ignores the potential value to consumers of DNSPs having access to real time metering data and risks missing the opportunity to use smart meters with the capacity to deliver real time data to benefit the power system as a whole. The capacity of DNSPs to provide the dynamic operating information and pricing signals on which many activities of consumers and their authorised representatives will depend in the future will be greatly limited by the approach to real time metering data advocated in the Directions paper.

The lack of a separate access right to real time data for DNSPs, together with the proposed 15-year staged implementation of real time metering and the reliance on consumers to request real time access before a DNSP can seek their consent to do the same will require DNSPs to invest in alternative means of gathering real time data about network conditions and customer behaviour. This could duplicate a real time data delivery pipeline from customer meters, adding unnecessary cost.

While the focus on the use of smart meters to enable access to real time data should be on consumers, the Directions paper's approach reduces DNSP access to real time metering data to that of an authorised representative of individual consumers, despite the central role of DNSPs in enabling the consumer-led energy future envisaged by the AEMC and many others. The requirement for consumer consent will also make the task of obtaining DNSP access to real time data from a sufficient number of meters onerous, particularly given the number of meters involved.  And with many of the use cases for real time data likely to require the interrogation of select meters on demand, rather than a constant stream of data, it is possible that DNSPs might be required to seek a customer's consent but never have the need to access their meter.

We also do not agree with the suggestion that DNSP use cases for real time metering data can be adequately served by the basic Power Quality Data (**PQD**) which is to be delivered daily to DNSPs under the *Accelerating Smart Meter Deployment Rule* (ERC0378). DNSPs require real time data for use cases such as fault finding and fault response, dynamic operating envelopes, the provision of customer outage and restoration notifications and neutral integrity fault detection, all of which result in improved outcomes for customers.

While those use cases may rely on real time access to metering data, TasNetworks reiterates the point made in its previous submission regarding the Real-time data for consumers rule that this does not mean that DNSPs require a constant stream of real time data, nor do they necessarily require real time data from every customer's meter.  So, while many of the use cases for real time data will require data more frequently than the five-minute timeframe suggested by Energy Consumers Australia in its original rule change request, we cannot see that there is a requirement for real time data to be recorded every second and delivered to DNSPs within a second.

The AEMC is concerned about the cost of a real-time data delivery mechanism for DNSPs that is separate to the access pathway being proposed for consumers  TasNetworks encourages the AEMC to reconsider the case for a solution that would give DNSPs access to a mix of streamed and event driven data in real time, as well as the capability to interrogate select meters on demand, which does not involve data recorded and delivered within a second. Less granular and frequent delivery of metering data in real time to DNSPs is likely to reduce the cost of such a mechanism.

In the interest of lowering the cost of the shared network for all consumers, we also maintain that, other than the costs associated with implementing the systems required for DNSPs to accept, manage and utilise data in real time, the real time metering data itself needs to be made available to DNSPs without direct cost for that data.

As the AEMC noted in the Consultation paper, DNSPs face barriers to accessing real time data on fair and reasonable terms, as they have done in relation to basic PQD, and forcing DNSPs to either obtain real time metering data on commercial terms or develop their own means of obtaining real time data is likely to lead to network costs for consumers that are higher than they might otherwise be  Given the take-up of consumer energy resources in Australia, there are also opportunity costs for consumers if DNSPs are unable to access real time metering data and use it to manage their networks dynamically, costs that need to be offset against the cost of a system that can deliver meter data in real time to DNSPs.

Once again, thank you for the opportunity to provide comments regarding the issues relating to improving access to real time metering data. To discuss the views expressed in this submission please contact Chris Noye, Leader Regulation, at

Yours faithfully

Sandra Thaow
Acting Head of Regulation