

23 October 2025

Anna Collyer
Chair
Australian Energy Market Commission
Via online Portal
REF: ERC0399

Dear Ms Collyer

Ausgrid response to AEMC Real-Time Data for Consumers Draft Determination

Ausgrid is pleased to provide this submission to the Australian Energy Market Commission (**AEMC**) in response to its Real-time Data for Consumers Draft Determination. Ausgrid operates a shared electricity network that powers the homes and businesses of more than 4 million Australians living and working in an area that covers over 22,000 square kilometres from the Sydney CBD to the Upper Hunter.

Ausgrid supports the intent of this rule change that consumers should have improved access to real-time data from their smart metering devices, which encourages them to engage more in their energy usage, unlock benefits from consumer energy resources and save on their bills. We support the changes put forward in the draft determination, which unlocks the consumer benefits from the rule change quicker than was previously outlined, through uplifting metering specifications to include local access within meter specifications from 2028.

Ausgrid supports the formalisation of 'real-time data authorised recipients', which will enable registered participants, including Distribution Network Service Providers (**DNSPs**), to access to real-time data at no charge where customer consent has been provided.¹ Access to real-time data will enable DNSPs to improve the service offered to consumers, allowing for better outage management (including for life support and vulnerable customers), asset condition monitoring, dynamic voltage management, demand response and the development of innovative products and services for customers.

However, Ausgrid seeks greater clarity on elements of the Draft Determination, including the provisions and mechanism for access to real-time data for real-time data authorised recipients. In particular, we are seeking further clarity on:

- **Potential risks to the accelerated rollout of smart meters** – We encourage the AEMC to consider potential unintended outcomes of the timeframes for introducing new meter specifications within the period of the accelerated deployment of smart meters to 2030. We seek greater certainty that the introduction of the real-time data rule change will not impact approved Legacy Meter Replacement Plans (**LMRPs**). Altering the minimum specifications of meters to comply with this rule change could influence retailers' intended timetables for deploying meters under the LMRP. Where this results in significant changes to the deployment schedule, this could create consequential costs for DNSPs'

¹ Australian Energy Market Commission, National Electricity Amendment (Realtime data for consumers) Rule 2025 Draft Determination; pp. 35-37

metering compliance and operations teams. This issue is compounded for multi-occupancy dwellings (that are common in Ausgrid's service area), where retailers servicing a customer in a multi-occupancy dwelling could trigger the 'one-in, all-in' replacement of all other customers' meters in the building. This requires careful resource planning and support from DNSPs, as has been undertaken in the approved LMRPs. We recommend clearer guidance to retailers and metering service providers on how to manage the impacts on LMRPs to avoid unintentionally driving increased costs through material shifts in planned meter deployments.

- **The mechanism for 'explicit informed consent' from consumers** - 'Real-time data authorised recipients', including DNSPs, will require explicit informed consent from consumers to access and use real time smart meter data. It is unclear how this mechanism to capture and maintain consent will work (e.g. will it assume opt-in/opt-out measures). The Draft Determination assumes DNSPs would be subject to the same processes as other third parties, which we note is inconsistent with the National Electricity Rules (**NER**), which already supports DNSP implicit consent to access Power Quality Data (**PQD**) through the Basic PQD service. We recommend further clarification on how explicit informed consent will be captured and maintained for different real-time data authorised recipients is provided in the Final Determination.
- **How data will be accessible to DNSPs** – We recommend greater clarity on how the rule will practically support data sharing and access to real-time data for participants including DNSPs. The Draft Determination does not provide details on how access to real-time data will be supported and this will unlikely be resolved without further definition in the rules or associated AEMO procedures. We recommend the AEMO consider how existing AEMO procedures, guidelines, standardised file formats and market system investment for smart meter data could be leveraged for this purpose. We also note this may have cost implications for industry that were not considered in the scope of the Oakley Greenwood cost-benefit assessment.
- **Cybersecurity and interoperability impacts** - Cybersecurity concerns stemming from the opening of smart meters to information flows are material and will need clear design guidance led by AEMO and utilising government cyber security experts. While the draft rule provides for a minimum standard of one-way data flows (out of the meter), the draft rule allows for bi-directional data flows where the metering coordinator considers that the meter would remain secure. This unavoidably creates an additional point of vulnerability – to the meter and to the extended electricity system – which metering coordinators will be responsible for keeping safe. We support AEMO being required to consider these impacts and to prepare relevant cybersecurity provisions to ensure implementation of real-time data is managed safely.

We note the method for obtaining and maintaining customer consent and the practical arrangements and obligations for supporting the development of data sharing infrastructure and cyber security will have implications for the costs that would be incurred by DNSPs as real-time data authorised recipients. This in turn has consequences for the balance of costs and benefits to DNSPs and ultimately the costs borne by all consumers associated with this rule change.

We welcome further collaboration with the AEMC and industry on this rule change proposal. Please contact Simon Moore, Senior Policy Advisor at simon.moore@ausgrid.com.au should you wish to discuss further.

Regards,

A handwritten signature in dark ink, appearing to read 'M Chandler'.

Murray Chandler
Head of Network Strategy & Future Grid