



Real-time Data for Consumers, Draft Determination

Clean Energy Council Submission

Thursday, 23 October 2025

Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Submitted electronically via www.aemc.gov.au

Response to Draft Determination on Real-time Data for Consumers

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback to the Australian Energy Market Commission (AEMC) on the “Real-time data for consumers” consultation on the Draft Determination (ERC0399).

The CEC is the peak body for the clean energy industry in Australia. We represent and work with Australia's leading renewable energy and energy storage businesses, as well as a range of stakeholders in the National Electricity Market (NEM), to further the development of clean energy in Australia. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC is supportive of the proposed rule change to enable energy consumers to access their real-time data collected by their meter. It is clear that improved consumer access to data has the potential to provide several benefits to consumers, including:

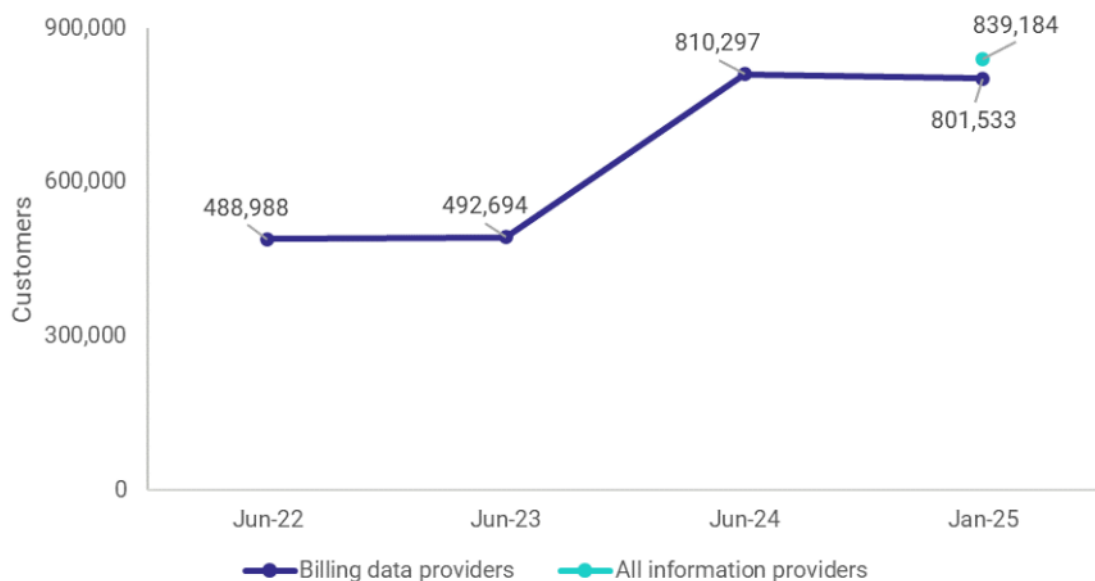
- **Consumer Education** – facilitating households the opportunity to gain insights in their usage patterns and requirements to better manage consumption and electricity bills, including behavioural shifts. This highlights the importance of communication regarding real-time data paired with the smart-meter roll out to increase understanding of these benefits.
- **Demand Response** – real-time access can highlight high energy consumption and high usage appliances, providing the ability for consumers to participate in demand response programs, increasing their potential savings and contributions to grid stability.
- **Informed CER Investment** - greater insights into energy consumption habits can also assist customers with choosing, and right-sizing, consumer energy resources (CER) for their homes such as rooftop solar PV and behind-the-meter battery storage systems.
- **Greater Range of Products & Services** - in some instances it can help aggregators and electricity retailer's structure more innovative retail pricing and customer products – like virtual power plants (VPPs) for customers to access greater benefits from their installed CER.

Customers participating in behavioural response programs has continued to increase significantly in the last few years, indicating this is a key growth area for consumer energy services in the future. Access to real-time data is a key influence in participation, as can be seen in Victoria, with a smart meter

penetration over 99% and the highest number of consumers participating in demand response programs¹.

Figure 1: Customer Participation in Behavioural Response Programs

Total residential behavioural demand customer numbers for retailers, June 2022 to January 2025



Source: [Inquiry into the National Electricity Market - July 2025 report](#)

As access to real-time data becomes more readily available for consumers, it will be essential to ensure a variety of demand response programs exist to support the expected benefits of this Rule Change. In January 2025, the ACCC identified only 5 retailers offering behavioural demand response programs to residential households, with 95% of customers serviced by 3 retailers². Financial rewards are still modest for customers, the current median annual value of behaviour demand response credits for participation is around \$5.86 per customer, less than 1% of the median annual bill (2023/24).

Realising benefits for all consumers

The CEC is supportive of the Draft Determination's revision to provide progressive access to real-time data from 2028. As significant interest from customers in this product grows over the next 5 years, the increased ability to participate is expected to lead to more innovative offers and choice for households and small businesses to reduce their bill and have greater consumer control.

As demand response programs are also accessible to customers without consumer energy resources (CER), the outcomes of this Rule Change should aim to lead to more equitable access for consumers in a range of non-CER households, such as apartments and rental dwellings. It is important to note, however, that not all of these benefits will necessarily be recognised across the full market, and we would encourage the AEMC and the Australian Energy Market Operator (AEMO) to continue to work with

¹ [Inquiry into the National Electricity Market - July 2025 report](#)

² [Inquiry into the National Electricity Market - July 2025 report](#)

interested stakeholders to ensure that the real-time data procedures are providing genuine benefit to customers.

We previously cautioned that any new reforms to enable this must carefully balance the costs and ensure they do not outweigh the benefits. We are supportive of the AEMC's engagement of Oakley Greenwood to undertake a cost benefit analysis (CBA), however, note that the primary market benefit arises from avoided installation costs of alternative devices, mainly flowing through to CER customers.

The CBA also highlights the potential for additional market benefits, such as better utilisation of smart appliances and reduced wholesale costs by lowering consumption, with an estimated 6% reduction in consumer energy usage. These benefits can only be realised with appropriate policy support and communication to consumers throughout the installation of their smart meter. It is recommended consumer education on real-time data is built into the communication plan for smart meter roll-out and additional installer information and training is provided, as the primary touchpoint for households. This will ensure the value of smart meters is realised through enabling the data they produce is understandable and actionable for all consumers.

A key consideration to drive efficiency and cost reductions is to open access to real time data through other options. There are devices or services that can collect data at the meter, rather than directly from the meter. Ensuring this type of innovative solution can compete with data from the meter should drive efficiency and encourage competition within the market until the initiation of this Rule Change from 2028 or for states that will miss out on real-time data communications functionality, such as Tasmania, due to smart-meter roll out completion prior to 2028.

Further, application programming interface (API) and cloud-based technology developments should also drive efficiency improvements. As such, meters with real-time data access capability may reach price parity with meters without real time functionality in the near future.

Interim arrangements

The CER sector is continually evolving and under a period of significant reform since the commencement of the Federal Government's National CER Roadmap. We encourage clearer integration of this Rule Change with national workstreams, as some elements overlap with National Reform Priorities such as the Data-sharing Arrangements (M2) and Framework for a National Technical Regulator (T2)³ projects. As many of these workstreams have current implementation dates for 2027, we encourage the AEMC to provide an extended timeline to AEMO to establish real-time data procedures that incorporate outcomes from the National Reform Priorities, particularly relating to interoperability and data sharing.

The CEC is supportive of the explicit requirement for AEMO to develop Real-time Data Procedures as definition of data formats, cybersecurity and interoperability will provide greater governance, clarity and national consistency for industry. Our recommended extended timeline on their publication will further provide AEMO the increased opportunity to engage with industry over the relevant standards, protocols and technical requirements relating to real-time data procedures.

³ [National Consumer Energy Resources \(CER\) Roadmap Implementation Plan Update August 2025](#)

The changes outlined in the Draft Determination better support Energy Consumers Australia's (ECA) proposed outcomes to enable consumers and their authorised agents to access real-time data from smart meters, at no charge, with data delivered in a form that is meaningful for consumers to engage with. We are supportive of the extended consumer protections to prevent the disclosure of access to real-time data to an affected customer and the required revoking of accesses upon request and vacation of the premises. These measures should reduce the opportunity for data to be accessed or misused by unauthorised authorities and ensure appropriate protections are in place for customers affected by family violence.

The Clean Energy Council welcomes further opportunity to discuss the recommendations in this response with the AEMC. If you have any queries or would like to discuss the submission in more detail, please contact Con Hristodoulidis (christodoulidis@cleanenergycouncil.org.au).

Kind regards,



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