

23 October 2025

Anna Collyer
Chair
Australian Energy Market Commission

Dear Ms Collyer,

Real-time data for consumers Draft Determination (ERC0399)

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Real-time data for consumers Draft Determination.¹

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA recommends providing greater clarity on the process to obtain consumer consent for third-party access to data. It is unclear currently how the practical elements of the process to obtain consumer consent is intended to work. Under the National Electricity Rules (NER), Distribution Network Service Providers (DNSPs) will already have access to consumers' smart meter data through basic power quality data arrangements commencing in 2026. ENA recommends the consent process for third-party access for DNSPs should be managed in the same way as the basic power quality data. An additional process duplicates established processes, adds complexity and costs for consumers to be able to access the benefits of real-time data access.

ENA has some concerns about depending exclusively on a competitive retail market to set smart meter prices, especially in regional areas with limited competition and new technical capabilities required. ENA is concerned this sole reliance could create price disparities for consumers between metro and regional locations which would limit the uptake of the new type of smart meter and have an impact on data availability. It is imperative to consider the long-term impacts on all consumers and consider additional measures to bring down smart meter costs.

The draft determination has a focus on facilitating connection. More consideration should be given to supporting customers in maintaining connection. The benefits of real-time data are only actualised when customers have a consistent connection. Regional customers may be subject to weaker wifi connections and maintaining connection should be an important factor to avoid disparities between metro and regional customers.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst, via vbaikie@energynetworks.com.au.

Yours sincerely,



Russell Pendlebury
General Manager Regulation & Policy

¹ AEMC, [Real-time data for consumers](#), Draft Determination, 11 September 2025