

23 October 2025

Australian Energy Markets Commission (AEMC)
Level 15, 60 Castlereagh St
Sydney NSW 2000

Draft determination – Real-time data for consumers (ERC0399)

Endeavour Energy appreciates the opportunity to provide feedback to the AEMC's [Real-time data for consumers draft determination](#). We support the intent of the proposed rule change to improve access to real-time metering data for customers and their appointed representatives; however, as noted in our [prior submission to the directions paper](#), we are concerned the draft rule will delay and stifle opportunities for customers to benefit from services reliant on this data.

The rules should ensure all customers can access their real-time data free of charge before a pre-determined date

A key change from the directions paper is to amend the metering service specification to require all meters installed from 1 January 2028 to have real-time functionalities. The objective of the change is to better facilitate access to real-time data free of charge sooner than what would be achieved from mandating free access from 2040 (as proposed in the directions paper). However, it will also mean customers with smart meters installed prior to 1 January 2028 will only be able to receive real-time data without charge after 2040. In the interim, customers would need to purchase an alternative third-party device or alternatively, pay an unregulated and non-transparent charge to bring forward the installation of a compliant smart meter.

Delays are likely to affect customers who will have their meters replaced early in the Legacy Meter Replacement Period (LMRP) period and could also extend to customers with meters installed prior to this if they remain in service beyond their expected 15-year asset life. The number of affected customers is likely to be substantial noting LMRP replacement rates are expected to peak in the second year of the LMRP Period (December 2026 - December 2027) and a general uplift in replacements completed prior to the commencement of the mandated rollout. The risk of delayed free access could be exacerbated by an inherent commercial incentive to favour replacing meters upon failure over proactive replacement program.

We agree amending the minimum services specification would provide clarity and certainty over technical requirements and supports interoperability. Notwithstanding the current availability of meters with real-time data functionality, we also consider implementation timeframes should provide AEMO sufficient time to develop real-time data procedures and standards.

To ensure all customers can access their real-time data and benefit from the services they enable, the minimum services specification should be coupled with a requirement to provide access free of charge no later than 2035. This would provide customers and industry with certainty that real-time data would be readily available to all customers within a reasonable and specific timeframe; it would also incentivise sourcing and installation of meters with real-time capabilities to occur sooner.

Exempting DNSPs from customer consent requirements would be consistent with current arrangements

The draft rule enables accredited third parties (including DNSPs) to access real-time data with customer consent until such time that consent is revoked or the customer vacates the premises. Although there is no standardised method of gaining consent, the draft rule requires prospective parties to provide customers with specific information to allow them to make an informed decision. However, we query the value of requiring DNSPs to obtain consent on an individual-consumer basis, given the metering framework

provides DNSPs access to basic and advanced power quality data (PQD) services (free and at a negotiated price respectively) without any requirement for explicit customer consent.

As existing regulatory safeguards already prohibit DNSPs from misusing metering data, we consider they should be exempt from the proposed consent requirements. Furthermore, many network use cases that offer the greatest net benefits rely on widespread access to real-time data. Obtaining consent from a broad and diverse customer base would be impractical and inefficient for DNSPs, especially when they lack a direct or primary relationship with many of those customers. This challenge is further compounded when the benefits of a network use case accrue to customers across the distribution network, rather than being confined to an individual customer.

Given the existing arrangements for DNSP access to basic and advanced PQD services, it would be more efficient and appropriate for customer consent obtained by an accredited third-party to also extend to the relevant DNSP. We recognise this approach could over time result in a portion of the metering fleet capable of delivering valuable real-time insights becoming underutilised, delaying potential cost savings and system-wide benefits. However, this could be alleviated if DNSPs were afforded access to real-time data from all meters free of charge from a defined future date. Potentially, this date could coincide with our suggested requirement for all premises to have meters with real-time data functionality by 2035.

Access to real-time data supports distribution network initiatives that benefit consumers and contribute to a more efficient energy system

We are concerned that, by not differentiating between DNSPs and other, less regulated third-parties, the draft rule fails to appreciate the value of real-time data to deliver network management and optimisation enhancements needed to support a resilient and reliable energy system.

The use cases that DNSPs have highlighted during consultations and regulatory proposals¹ rely on real-time data to deliver meaningful benefits to consumers and the energy system, while also achieving operational efficiencies (translating into significant cost savings and service improvements that customers value). These use cases are practical, not sensitive to future market reforms or trends, and are not merely incremental improvements; if provided with access to low-cost, real-time smart meter data under commercially viable terms, DNSPs could rapidly deploy these solutions at scale.

Basic PQD is insufficient to realise these benefits. For example, managing large volumes of consumer energy resources requires informed decisions to be made about export limits and local network conditions. This requires real-time visibility across different parts of the network to coordinate increasingly complex technologies while maintaining system security. Given the unpredictable nature of these behaviours, timely access to real-time data is essential, as delayed or basic PQD simply does not meet operational needs to support our transition to a more advanced and sophisticated distribution system operator model.

If you have any enquiries about our submission, please contact Patrick Duffy, Manager Regulatory Transformation and Policy at Endeavour Energy via email at patrick.duffy@endeavourenergy.com.au.

Yours sincerely



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¹ These use cases utilise smart meter functionality and data analytics to improve network visibility, including applications such as outage management, neutral fault detection, dynamic operating envelopes for flexible connections, and dynamic voltage control. Refer to [our submission the consultation paper](#) for further details.