23 October 2025

Ms Anna Collyer
Chair
Australian Energy Market Commission

Project Reference Code: ERC0399

Dear Ms Collyer

Real-time Data for Consumers Draft Determination

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) in response to its Real-time Data for Consumers Draft Determination.

The attached submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);
- Regional service delivery Retailer, Ergon Energy Queensland Pty Ltd; and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Metering Dynamics Pty Ltd trading as Yurika Metering.

Energy Queensland is generally supportive of initiatives which provide customers with the data necessary to understand and make decisions with respect to their energy use. While we support the principle of enabling access to real-time data from smart meters, the proposed rule change will generate new costs ,related to new meter functionality and systems administration, which will be borne by all customers, many of whom may not want or need access to real-time data.[1] The impact of added cost pressures should not be overlooked at a time when energy affordability remains a significant concern for customers.

We continue to hold the position, as stated in our submissions in response to the Consultation Paper and Directions Paper[2], that given real-time data is likely to primarily be used by highly engaged and sophisticated consumers and third parties, the costs of

[1] Energy Queensland notes that small customer uptake of the Consumer Data Right for energy has been limited and, although not a perfect analogy for access to real-time data, it may serve as a point of reflection as to whether all customers will want or need access to real-time data.
[2] Energy Queensland's submission in response to the Consultation Paper can be viewed here. Our submission in response to the Directions Paper can be viewed here.

access should be borne by the party receiving the data – in accordance with the 'user pays' principle. All customers, who individually may not want access to such data, should not be paying for those who do.

Energy Queensland's more detailed comments in response to the questions posed in the Draft Determination are set out in **Attachment A**. Neither this letter nor our enclosed comments contain confidential information.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me at the contact details below or Mark Simpson on 0467 837 450.

Yours sincerely

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Enc: **Attachment A** - Energy Queensland's comments on the AEMC's Draft Determination

Attachment A

Energy Queensland Submission

AEMC Real-time Data for Consumers Draft Determination

Consultation Question	Energy Queensland Comments
Question 1: Would our draft rule encourage consumers and energy service providers to access real-time data from smart meters? What is the benefit of this?	Broadly, Energy Queensland considers that the following are some of the potential benefits of enabling access to real-time data from smart meters: • enabling the development of services which can assist consumers to make informed decisions in real-time about their energy usage, respond to price signals, and manage customer energy resources (CER) systems more effectively. • greater visibility into energy consumption which supports grid optimisation, reduces peak demand, and facilitates better integration of CER. • for customers on dynamic connections, reductions in the cost to the customer by removing the need to install additional metering equipment.

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Question 2: Should the min specs be changed to require all new meters installed from 2028 to be able to communicate real-time data both wirelessly and through a wired connection? Would changing the min specs increase benefits whilst imposing low costs on all consumers?	Energy Queensland acknowledges that amending the minimum specification for smart meters appears to make practical sense to avoid the deployment of several million more smart meters throughout the National Electricity Market by 2030 without this functionality. However, our discussions with vendors to date, has indicated a preference for wi-fi only as the more affordable option for consumers. In addition to affordability, a wi-fi only option as a single solution would streamline processes for Metering Coordinators (MCs) providing the service and customers utilising the service.
Question 3: Do you agree with the costs the CBA estimates would be incurred to implement our draft rule? Would these costs decrease over time?	Energy Queensland has concerns that some of the estimates used by Oakley Greenwood in the cost benefit analysis are too low. It is our view that the estimate of $5 per NMI is too low and not an accurate representation of the true implementation costs. We suggest Oakly Greenwood consider the following costs to ensure a truer representation: • costs of managing real-time data requests, such as B2B system and operational changes to facilitate retailer validating services. • costs of contacting and managing end user customer enquiries which is a departure from business processes customer data. • costs of the MC enabling the customer to use new device once installed and/or to de-activate (note, this is not a once off activity with activity required each time there is a change to CER equipment, providers or customers). • costs of revisiting site and installing meters with new specifications. • costs of maintaining a real-time data service at an existing Type 4/4A metering installations. In addition to the above, security issues in connecting to customer wi-fi and facilitating and granting access to authorised participants may increase the costs of providing real-time data to consumers over time and would also

Consultation Question	Energy Queensland Comments
	be much higher for customers with Type 4A meters, as site visits would be required for any actions due to the lack of remote communications to the meter.
Question 4: Our draft approach is to progressively enable consumers with new meters installed from 2028 to access real-time data at no charge. What is the benefit of enabling more consumers to access real-time data from smart meters, at no charge, sooner?	Energy Queensland is of the view that the AEMC's proposed timeline, that all meters installed from 1 January 2028 will be required to meet the new minimum services specifications, will make it difficult for MCs. It is expected that meter suppliers would only begin the design process of a meter asset to meet new industry specifications once AEMO procedures are published (currently proposed to be 1 July 2026). Further time considerations need to be made to allow for the implementation of changes into the supply chain including manufacturing of new equipment, establishment of new supply contracts, onboarding of new equipment and related systems, etc. In addition to the above, it is our view that the proposed start date of 1 January 2028 is impractical for the following reasons: • this time of year is the midst of storm and fire season and there is significant operational risk in deploying major changes to critical systems during this period. • likewise, the end of year public holidays pose limitations to how easily changes are deployed. We note that January 1 is a public holiday of itself, and the preceding week includes Christmas/Boxing Day public holidays. • the proposed date sits outside AEMO's normal release windows. We are therefore of the view that amending the proposed start date from 1 January 2028 until at least 1 May 2028, would be more practical. As a result of the above, we believe there are challenges in enabling more consumers to access real-time data from smart meters sooner than the proposed timeframe. These challenges include: • unknown change impacts from AEMO's procedures, which will further specify any interoperability standards, security protocols and technical features, that are proposed for publication in July 2026.

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	• a minimum 12–18 month period is required for integrating new meters after technical specifications have been finalised and solutions made available for testing. This integration would include testing with metering systems and implementation of new operational processes.

Question 5: What information would be useful for consumers to help them determine if accessing real-time data is beneficial and if any charge to them, to upgrade the meter, is reasonable?	Energy Queensland notes, in relation to draft national energy retail subrule 59E(2)(b), that not all existing meters will be able to be retrofitted to enable access to real-time data. This would create a scenario whereby the customer may not be able to exercise such a choice. We are of the view that the better policy position would be to remove customer choice in this instance and instead impose an obligation on the MC to advise the retailer of the most cost-efficient option to enable early access to real-time data, whether that be by retrofitting or replacing the meter. This places the decision in the hands of the technical experts with the restriction that the advised option be the most cost effective. We believe this would provide a better, and more administratively efficient, outcome for customers.
	
	To help consumers determine whether accessing real-time data would be beneficial, the following types of information might generally be useful:
	
	• consumers need to understand how real-time data can be used to:
	  ○ monitor and reduce energy consumption
	  ○ optimise the use of solar PV, batteries, and electric vehicles
	  ○ respond to time-of-use pricing and dynamic tariffs
	  ○ improve visibility and control over household energy usage
	• this information should be presented in simple, relatable terms with examples of typical savings or improved outcomes.
	
	Energy Queensland is of the view that the responsibility to promote the potential benefits of accessing real-time data from smart meters should sit with the third party authorised recipients whose service offerings would rely on

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	access to this data. This responsibility should not fall on retailers whose role is limited to facilitation of access between the requesting customer and the MC.
Question 6: Would any other regulatory mechanisms better enable all consumers to access real-time data from smart meters, at low cost to the market?	Energy Queensland is of the view that no mechanism would provide a low-cost option to the market. The requirements of new asset specifications, change impacts to business operational processes, digital platform and infrastructure changes to facilitate the transfer, access and management of real-time data, will be costly and, under the proposed rule, these costs will be shared by all consumers. As stated in our cover letter, while we are supportive of initiatives which provide customers with the data necessary to understand and make decisions with respect to their energy use, we continue to hold the position that, given real-time data is likely to primarily be used by highly engaged and sophisticated consumers and third parties, the costs of access should be borne by the party receiving the data. All customers, who individually may not want access to such data, should not be paying for those who do. The impacts of these added cost pressures should not be overlooked at a time when energy affordability remains a significant concern for customers, especially when viable solutions to enable access to real-time data from smart meters already exist and can be easily accessed by those customers who see value in this data at no cost to broader consumers. To this point, we note that the AEMC, at page 18 of the draft determination, states that: *"…alternative pathways to access data may be sufficient to satisfy their use cases either in the short term while they wait for the meter installed at their premises to be naturally replaced, or in the longer term:* • *for CER customers who need access real-time data to manage CER under export limits, the CBA estimates that a CT would be lower cost than retrofitting or replacing a meter* • *for customers who want to make informed energy choices, energy consumption at a day's lag can be accessed through the mechanisms described in appendix A.1. These customers may therefore not*

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	pursue a real-time data solution in advance of the meter being upgraded according to the existing replacement schedule. *ECA agreed that energy consumption data at a day's lag is beneficial for customers. ECA considers that, at a minimum, all customers with a smart meter should have ongoing access to energy consumption data at no more than 24 hours delay, provided in a manner easily accessible and digestible. This would ensure that customers who do not have access to real-time data, at no charge, would have access to other forms of data that would sufficiently support more informed energy choices."*
Question 7: We proposed a definition of real-time data and a requirement on AEMO's real time data procedures. Would these provide industry with sufficient clarity on what real-time data is, and how real-time data would be made accessible from smart meters?	Energy Queensland is supportive of the AEMC's proposed definition of real-time data as it provides industry with clarity and aligns with the existing definition of basic power quality data. However, at this point in time, we do not feel that we are able to confirm whether the definition is feasible or not as the following dependencies need to be considered: • the protocol used to determine the inability to enable access to data in real-time. • The potential lag in data and hence impact the reliability of delivery data once per second in accordance with requirements. • more details required of AEMO's real-time data procedures, which should specify interoperability standards, define security protocols to protect data and meter integrity and set technical parameters such as latency thresholds and sampling frequency. • unknown outcomes of testing and piloting in determining the reliability of the solution.
Question 8: Our draft rule would introduce a range of requirements on different parties to enable customers to access real-time data. Do you consider that our draft rule would	Energy Queensland would like to highlight that, in relation to Type 4A metering installations, the proposed rule 59E(5), which imposes a 15-day obligation on retailers to facilitate real-time data access, may be setting an unrealistic expectation, ultimately leading to poor customer experiences.

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support a good customer experience for customers requesting access?	Due to difficulties with managing real-time data services on Type 4A metering installations (with communications infrastructure) within this timeframe and that this may set an unrealistic expectation for the MC completing requested work that would lead to a poor customer experience. Whilst it is still unknown how real-time data services would be activated/de-activated, and how data security and customer access will be managed, it is expected that for a Type 4A meters the MC will be required to attend site, most likely with an appointment requiring the customer to be on-site to undertake joint actions. We also note that Type 4A meters are often remote and may have access issues as well which impact the management of timeframes. We are of the view it may be appropriate for the rule to either call out an exception, by amending subrule (6), where the installation is a Type 4A. In relation to the requirements on retailers, Energy Queensland notes that the draft determination, at page 31, limits retailers to a facilitation role: *"Retailers would not directly interact with the metering installation to facilitate access to real-time data. Retailers have a contractual relationship with MCs for metering services. In practice, a retailer would facilitate access to real-time data by arranging for the MC to do so in accordance with the terms of their contract."* As such, while we acknowledge the potential for the initial enablement of access to real-time data to be managed by retailers, subsequent consent arrangements should be managed by the customer themselves via an online platform. This approach reflects the limited facilitation role of retailers and the service order-based transaction approach which reflects the way market participants action requests. There is potential for alignment of the customer consent/verification process for real-time data with the process used for the Consumer Data Right (CDR). We envisage that all requests for access and the consent/verification process be entirely digital, possibly enabled via a mechanism hosted on the retailer's website or customer portal.

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	Customers could also manage the access they have enabled to third parties via this mechanism (similar to the CDR dashboard). Further, Energy Queensland provides the following comments in relation to the identified proposed provisions: • 59E(10) - it is our view that any requirement to provide information about how to access data should be limited to general advice on a website, similar to how to read a meter. • 59E(11) - it is not clear to us why an outgoing retailer needs to tell a new retailer of the customer access real-time data and why this is of relevance. For example, will the change of retailer impact access? Will change of MC impact access? How would this information be communicated - via market message?
Question 9: Would our draft rule introduce appropriate security measures to protect customer information from being accessed by unauthorised parties?	Energy Queensland recognises the importance of data security and the need to ensure that access to real-time data from smart meters is enabled and managed in the most cyber secure way. This guarantees security of customer data as well as security of the meter. However, we are of the view that the processes for DNSPs (as a real-time data authorised recipient) to access real-time data on behalf of customers should occur in a similar manner to the existing deemed consent provision for network devices (see clause 7.8.6(c) of the National Electricity Rules). This would align with the existing process for network devices, of which Energy Queensland has more than 50,000 installed at customer premises, which collect similar data already.
Other feedback	Energy Queensland would like to provide the below further comments: • we acknowledge that the draft determination indicates that the rule does not apply to an embedded network, however we are of the view that the final determination may benefit from providing additional certainty, for example, is there any intention that child connection points, within an embedded network, would be able to access to real-time data under the proposed rules?

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	• we would also appreciate additional clarity in the final determination as to whether real-time data access obligations would apply to Type 8 metering installations at a small customers installation. We have assumed this to be that case, as the changes to the minimum services specifications only relate to small customer metering installations – Type 4 (COMMS 4D and 4C meters) - and not Type 8 installations as these have a different minimum specification requirement. <u>Proposed amendments to the National Electricity Rules</u> • clause 7.15.7(g) – This clause requires that the amount that the MC charges be a reasonable estimate of the costs incurred for an upgrade or new meter. We suggest that this could benefit from further clarification as to whether this seeks to act as a cap on the profit margin an MC may apply and whether it is the AEMC's intent that MCs apply a fixed charge. • clause 7.16.6E(5) – The initial real-time data procedures may not be published until 1 July 2026. In the meantime, we believe additional clarity from the AEMC would be helpful to better understand what should happen in the scenario a customer has refused remote comms under clause 7.8.4(d) (type 4A meter) but then instructs the retailer that they require wireless access to real-time data. Would this be possible with comms disabled or would they have to choose to move to a type 4 meter or otherwise use the wired option to access the real-time data? Additionally, how would the costs of this be recovered? <u>Proposed amendments to National Energy Retail Rules</u> • subrule Rule 59F(1)(a)(ii) – Similar to National Electricity Rule 7.15.7(g), this subrule requires the retailer to only apply a charge that does not exceed a reasonable estimate of the costs incurred by the retailer to facilitate real-time data access. We suggest that this would benefit from further clarity in the same way the proposed National Electricity Rule would.