23 October 2025

EnergyAustralia
LIGHT THE WAY

EnergyAustralia Pty Ltd
ABN 99 086 014 968

Level 19
Two Melbourne Quarter
697 Collins Street
Docklands Victoria 3008

Phone +61 3 9060 0000
Facsimile +61 3 9060 0006

enq@energyaustralia.com.au
energyaustralia.com.au

Ms Anna Collyer
Mr Tim Jordan
Ms Sally McMahon
Mr Rainer Korte
Ms Lana Stockman
Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2001

Submitted electronically: https://www.aemc.gov.au/contact-us/lodge-submission

Dear Commissioners

Real-time data for consumers — draft determination

EnergyAustralia is one of Australia's largest energy companies with around 2.2 million electricity and gas accounts across eastern Australia, of which around 22k customers are supported under our hardship program (EnergyAssist). EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind and solar assets, with control of over 5,000MW of generation capacity.

We appreciate the opportunity to provide feedback on the AEMC's draft determination on real-time data for consumers. EnergyAustralia supports providing customer's access to any metering data they would benefit from; however, we believe the draft determination would inequitably[1] allocate costs to all customers for the benefit of a smaller cohort of Consumer Energy Resource (CER) customers, of which the true beneficiary is the CER manufacturer or provider. We therefore do not support the current drafting and urge the AEMC to reconsider how access to real-time data should be facilitated in a more equitable manner.

The AEMC should consider the following when deciding if the draft determination truly minimises costs and delivers benefits to all customers[2]:

1. Customers won't personally be able to access real-time data this without an additional device, or software solution to provide this information. These are not considered in the draft determination. Access to real-time data is not envisaged for the end customer and, as described by the AEMC, is only expected to reduce the cost and increase the ease of CER manufacturers and providers in offering bespoke energy solutions to their customers.

[1] National Energy Objectives 4.1.6
[2] *'We consider this draft rule would better promote the national electricity objective (NEO) and the national energy retail objective (NERO) than ECA's proposal because it minimises costs to all customers whilst still delivering benefits to all customers'*

2. How these CER manufacturers and providers will use this information is also unclear, with the explanation of the need focusing on reduced costs by avoiding the entities requiring additional infrastructure at site.

   If these CER manufacturers and providers are intending to use this data to offer energy products and services to their customers, either demand management or via financial benefit from customer's energy use or export, it would seem perverse that this regulatory change is providing an avenue that avoids the existing framework for providing these offerings to customers.

   We strongly urge the AEMC to consider how the offerings these entities will provide are not more suitably (in terms of consumer protections) provided by requiring these CER manufacturers and providers to have retail and/or market accreditation and comply accordingly with the associated regulatory frameworks.

3. Moving the timeframe forward to 1 January 2028 for metering to be real-time capable will only benefit the ~15% of customers that are yet to have their meter exchanged, the beneficiaries become significantly smaller when considering how many of these customers will request and use real-time data.

4. Metering Coordinators have been planning and procuring for the Metering Acceleration, changing the production of the metering fleet will have financial implications above the speculated $15 per meter for enabling access to real-time data.

   Engineering, software, testing, certification and back-end system enhancements are key costs that have not been included, and there are many concerns on data/cyber security to be addressed, which will also incur additional costs to resolve.

   These combined will create a significant increase to the $15 cost discussed in the draft determination, and as these are easily identifiable additional expected costs it is disappointing that $15 was presented as the cost for providing access to real time data, as this is a misleading representation presenting that cost being more comparable to the benefit.

5. The draft determination enables customers without real-time capabilities to request their meter provide this information. This will either be retrofitting (where possible) or replacement. The cost of these two options needs to be established, as this will account for the remaining ~85% of customers.

   EnergyAustralia is particularly concerned about how costs will be recovered when providing real-time data will require a customer's meter to be replaced. This recovery is embedded in retail prices and Metering Coordinator agreements with retailers, replacing meters before their 'end-of-life' timeframe will create significant costs to be recovered.

   It would be prudent for the AEMC to consider how these costs compare to the installation of 'alternative devices' that CER manufacturers and providers currently employ to obtain this data.

6. AEMO will require significant changes to develop and resource the 'accreditation' or real-time data recipients, and in enabling the procedural changes required to facilitate these requests. These costs are not assigned on a 'user pays' basis and will also be incurred by all customers.

7. Dispute resolution was not discussed in the draft determination, and it is unclear how the AEMC expect this necessary interaction to be developed and required. Issues will occur in the request and providing of access to real-time data, the cause of the issue could sit anywhere between the customer, the customer's agent, their retailer, the Metering Coordinator/Provider, or AEMO (if the complaint relates to a delay in accrediting a real-time data recipient).

   Existing dispute resolution mechanisms (state based energy ombudsman schemes) will need changes to their scope to include any party not currently a scheme participant, and they would still be unable to include AEMO.

   State based energy ombudsman schemes have encountered difficulty in having embedded network providers join their schemes, it is therefore foreseeable that they would also struggle to have real-time data recipients join as scheme participants. Ultimately, the complexities involved in existing dispute resolution mechanisms being able to accommodate real-time data complaints will lead to dissatisfaction of customers and inefficient cost allocation, in delays in providing access and by assigning complaint costs inaccurately.

EnergyAustralia recommends that the AEMC consider **delaying the implementation of real-time access until the end of the metering acceleration**, with a subsequent requirement for replacing meters from that point (end-of-life, etc) required to be with a real-time capable meter. This would balance the risk of cost imposed upon all customers, with the likelihood that demand for this access will be greater at a later stage of the energy transition, and would provide a more reasonable timeframe for the above concerns to be adequately addressed.

If you would like to discuss this submission, please contact me on 03 9060 1361 or Travis.Worsteling@energyaustralia.com.au.

Regards

Travis Worsteling

Regulatory Policy Manager