



23 October 2025

Ms Anna Collyer
Chair, Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Submitted electronically

FROM THE OFFICE
OF THE CHAIR

Level 12
171 Collins Street
Melbourne VIC 3000

Postal Address:
GPO Box 2008
Melbourne VIC 3001

Dear Ms Collyer,

**Consultation Paper – National Electricity and National Energy Retail Amendment -
Real-time data for consumers Rule 2025**

The Information Exchange Committee (IEC) is a statutory body established under the National Electricity Rules responsible for developing and making recommendations on changing electricity business-to-business (B2B) Procedures. The IEC includes representatives from the Australian Energy Market Operator (AEMO), electricity industry retailers and distributors, competitive metering companies, embedded networks and Energy Consumers Australia. The IEC has a statutory role as set out in the National Electricity Rules (NER) (Attachment A).

The IEC recognises the implications for B2B processes and refers to AEMO's and the IEC's recent draft High Level Impact Assessment (HLIA), which indicates that more time is required for AEMO and the IEC to implement updates to industry systems and processes. As a result, the IEC considers November 2028 as a more appropriate go-live date for B2B processes that enable access to real-time data.

The proposed Rule change will require changes to B2B transactions and participant systems and processes to support:

- o Requests for RTD capable meters being installed or reconfigured.
- o Faults and investigations into the failure of RTD delivery.
- o The ability to enable, disable, reset and administer access to RTD.
- o Retailers enabling access to real time data services to customers and customer appointed representatives.
- o Customers or customer appointed representatives enquiring about the failure of a security key or data accessibility issues.
- o The communication of the security key between B2B participants.
- o Ombudsman related enquiries.

Any changes to the B2B transaction would require consultation under NER 7.17 with appropriate timeframes as required by NER 8.9, approximately 180 business days, followed by appropriate development and implementation time for industry of a further 180 business days.

The implementation will also need to consider the other initiatives in progress in both the gas and electricity industries and consequently, we recommend that the Commission nominate the stepped effective dates mentioned above, to allow for consultation, development and integration of the changes into the existing schedule of work that industry is undertaking.

The IEC welcomes continued collaboration with the Commission at any stage of its consultations to assist it to understand any potential B2B changes.

Should you wish to discuss this further, please contact the IEC secretariat at iec@aemo.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Kee Wong", is positioned above the printed name.

Kee Wong
Chair Information Exchange Committee

Attachment A

List of Current Information Exchange Committee Members

Member category	IEC members nominated
Chair	Kee Wong - AEMO director
Distributor	Luke Jenner (Essential Energy)
Retailer	Sean Jennings (Red Energy and Lumo Energy)
Metering	Paul Greenwood (Bluecurrent)
Energy Consumer	Jill Cainey (Energy Consumers Australia)
Discretionary (retailer)	Christophe Bechia (Zen Energy)
Discretionary (Embedded networks)	Marco Bogaers (Executive Director, Metropolis)
Discretionary (distributor)	Vacant

IEC Statutory Role

In fulfilling its statutory role in relation to managing the ongoing development of B2B Procedures and any changes to them, the IEC works collaborative across the different stakeholder groups in the energy sector to:

- Make recommendations on B2B Procedure changes and oversee the consultation process. In conjunction with AEMO, consider implications of potential policy changes which may affect B2B Procedures and contribute to B2B Procedure delivery management and prioritisation.
- Identify B2B Procedure continuous improvement opportunities
- In conjunction with AEMO, monitors and contributes to B2B Procedure delivery management and prioritisation.