Landis+Gyr
Tower B, Level 3, 201 Coward Street
Mascot NSW 2020

23rd October 2025

Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

RE: Response to AEMC 'draft determination' – Real-time data for consumers

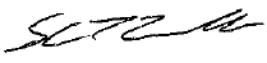
Dear Ms Collyer,

Thank you for the opportunity to provide feedback on the Australian Energy Market Commission (AEMC) draft determination regarding 'real-time data for consumers,' in response to the rule change request submitted by the Energy Consumers Association (ECA).

Landis+Gyr would be pleased to contribute further to the AEMC's consultation process. In summary, smart meters can be leveraged to provide real-time data for consumers, with consideration given to our responses herein.

Landis+Gyr is a global organisation that has been operating for over 120 years and has a local presence in more than 30 countries. It has deployed over 300 million meters worldwide, positioning itself as a leading provider of integrated energy management solutions for the utility sector. Landis+Gyr is recognised as a global industry leader in energy measurement solutions and advanced meter management, offering a broad portfolio in the market. The company delivers innovative and flexible solutions to help utilities address challenges in smart metering across electricity, gas, and water, as well as grid edge intelligence and smart infrastructure. With approximately 6,000 employees across five continents with annual sales of USD 1.9 billion, Landis+Gyr focuses on helping the world better manage energy. Landis+Gyr considers Australia as one of its key markets and aims to support future industry needs through innovation, value-add, and reliable products and services, with a focus on reducing costs. Landis+Gyr provides metering solutions into the Australian market, with a variety of technologies that are leveraged by customers today to manage flexible generation and loads that deliver cost savings to consumers. Landis+Gyr is working with its customers to support the challenges arising from the energy transition. They consider initiatives such as real-time data for consumers as paramount to ensuring changes in energy usage are managed appropriately to maintain the reliability and security of Australia's energy network. Landis+Gyr broadly supports an industry consultation along with relevant workshops to ensure an outcome that delivers the intended value to consumers, whilst leveraging existing standards and devices associated with CER and interoperability.

Yours sincerely,



Regards,
Opi Taumalolo
Head of Grid Intelligence & Industry
Landis+Gyr

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Response to draft determination questions

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?

Landis+Gyr supports the provision of local real-time data to Consumer Energy Resources (CER) via advanced technologies, particularly wireless communications. This approach offers scalable, secure, and cost-effective pathways to enable consumer access. However, further analysis is required to determine the feasibility of delivering real-time data through a wired port, especially in terms of safety, security, and consumer accessibility.

Upon reviewing the Draft Rule, Draft Determination, Draft Cost-Benefit Analysis (CBA), and stakeholder feedback, Scenarios 4 and 5 were identified as delivering the most favourable cost-benefit outcomes. This was confirmed by Oakley Greenwood, the consultants engaged by the AEMC to undertake the CBA. A key challenge is the accelerated implementation of the Power of Choice rule change, commencing 1 December 2025. Aligning real-time data access with the business-as-usual (BaU) smart meter rollout schedule significantly reduces economic costs, as outlined in the CBA.

The CBA also highlights that some CER Original Equipment Manufacturers (OEMs) may retain proprietary measurement approaches due to the additional cost of removing existing integrated metering. As they believe a shift to real-time data from the smart meter introduces third-party risks. Since CER providers would need to rely on data from meters they do not control—potentially limiting uptake of local real-time data. Australian Standards have historically ensured CER compatibility with the evolving energy landscape, particularly given Australia's high penetration of rooftop solar. Such as the DRED interface for air conditioners as defined in AS/NZS 4755.

The proposal to introduce a physical data port was added in the draft determination (Sep 2025). There has not been sufficient time to fully assess the implications of requiring a consumer-accessible port that meets safety and security standards. It is important to note that all meters deployed in the National Electricity Market (NEM) already comply with Australian Standards prescribed by AEMO, which include an optical port. This port is currently capable of energy data acquisition and meets existing safety and security requirements.

However, meter rule changes alone are insufficient. CER devices must also be updated to support open, standardised protocols and interfaces from smart meters. Without this, consumers may face additional costs without realising meaningful benefits. Further work is needed to ensure these well-intentioned reforms do not result in underutilised capabilities, as seen in other jurisdictions.

In summary, Landis+Gyr recommends:

- Prioritising advanced technologies such as wireless communications for real-time data access
- Ensuring CER interoperability with open-standard communication protocols
- Recognising existing optical ports as compliant and secure access points
- Avoiding consumer cost burdens by aligning implementation with BaU rollout schedules

Only through a coordinated approach that includes both smart meter and CER standardisation can consumers be truly empowered to access and benefit from real-time data.

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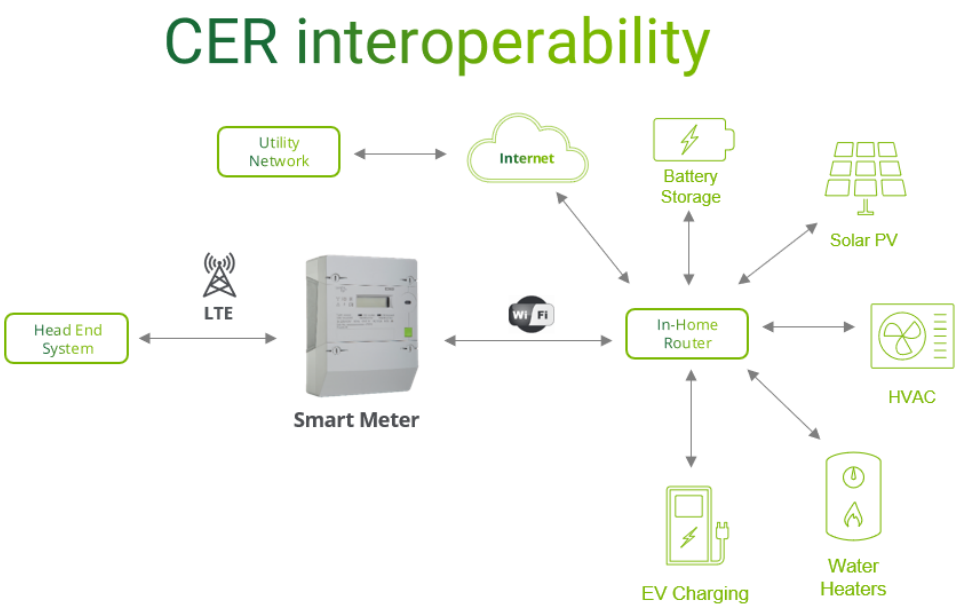
Question 2: Should the min specs be changed to require all new meters installed from 2028 to be able to communicate real-time data both wirelessly and through a wired connection? Would changing the min specs increase benefits whilst imposing low costs on all consumers?

Landis+Gyr supports the provision of local real-time data to Consumer Energy Resources (CER) via advanced technologies, particularly wireless communications. Wireless solutions offer a scalable, secure, and cost-effective pathway for enabling consumer access to real-time data.

While some CER OEMs have raised concerns about wireless enablement, we believe these will be addressed through AEMO's forthcoming technical specifications. The Cost-Benefit Analysis (CBA) references the Emergency Backstop Mechanism (and DOE), which are being implemented across multiple jurisdictions. This mechanism requires CER devices to maintain internet connectivity via the consumer's Wi-Fi network—the same network that smart meters would use for wireless data transmission. This alignment helps alleviate CER OEM concerns about connectivity and supports other regulatory initiatives such as Dynamic Operating Envelopes.

In contrast, a wired approach requires further analysis. Although some CER OEMs have expressed a preference for wired connections, this would necessitate a mandate that CER devices be installed adjacent to the metering installation. Since the cost of cabling—particularly labour—would likely outweigh the benefits of local real-time data access. Additionally, scaling a single physical port to support multiple CER devices presents technical and economic challenges, especially given the widespread availability of advanced wireless technologies such as Wi-Fi.

In summary, wireless communications present a more practical and cost-effective regulatory pathway to enable real-time data access for all consumers. This approach aligns with existing infrastructure, supports emerging regulatory mechanisms, and avoids the prohibitive costs associated with wired installations.



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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?

Landis+Gyr believes the CBA estimates only reflect part of the costs of implementation. We would need to know AEMO's technical specification in order to build valid estimate. The costs do not appear to account for systems and processes to manage the Wi-Fi provisioning process for example.

The administration of security for real-time data access will require a combination of credentials, including passwords, cryptographic keys, and/or digital certificates. These elements must be managed through software systems that carry a baseline cost and scale proportionally with the number of endpoints deployed across the network.

In addition to these foundational systems, further tools and support mechanisms will be necessary to ensure secure and reliable operation. These mechanisms are not yet fully defined and will require future development and standardisation to support broad deployment and interoperability.

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?

As outlined in our response to Question 1, Scenarios 4 and 5 were identified as delivering the most favourable cost-benefit outcomes, as confirmed by Oakley Greenwood in the Cost-Benefit Analysis (CBA). A key challenge remains the accelerated implementation of the Power of Choice rule change, commencing 1 December 2025. Aligning real-time data access with the business-as-usual (BaU) smart meter rollout schedule significantly reduces economic costs and avoids unnecessary disruption, as outlined in the CBA.

Should the existing optical port on smart meters not be accepted as a compliant wired interface for real-time data access, we recommend that the wired approach be omitted from the final rule requirements. Introducing a new physical port would not expedite consumer access to real-time data and likely trigger external modifications to meters and require potential changes to AEMO's prescribed standards. This would require defining a second physical port that meets consumer safety and security requirements—adding complexity, cost, and delay.

Landis+Gyr recommends that Type 4A meters be excluded from the real-time data access requirement. Since remote authorisation of local access is via the existing communications backhaul, which is vital in meeting the rule's objective of providing real-time data access to consumers free of charge. Requiring Type 4A meters to provide real-time data would introduce unnecessary complexity and cost that would need to be recovered due to site visits.

In summary, we understand that development of wireless solutions for local real-time data access is already underway among leading meter manufacturers. To fully enable consumer access to real-time data, CER OEMs must also adopt and implement interoperable standards, such as defined through Australian Standards, to ensure compatibility and functionality at the device level. This coordinated

approach is essential to delivering the intended benefits of the rule change without imposing unnecessary costs on consumers or the market.

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?

We will defer to other stakeholders to respond to this question.

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?

One effective regulatory mechanism would be to leverage and expand existing Australian Standards to support real-time data access in a secure, interoperable, and low-cost manner. The Cost-Benefit Analysis (CBA) highlights that some CER OEMs may retain proprietary measurement approaches due to the additonal cost of removing integrated metering.
To mitigate these risks and reduce market-wide costs, standardising real-time data interfaces through Australian Standards—similar to the approach taken with the DRED interface for air conditioners under AS/NZS 4755—could provide a consistent, vendor-neutral framework. This would:

- Encourage OEM alignment with open protocols
- Reduce integration costs for CER providers
- Minimise consumer burden
- Improve interoperability across the energy ecosystem

Such a standards-based approach would complement existing regulatory efforts and ensure that real-time data access is both technically feasible and economically sustainable, particularly considering Australia's high rooftop solar penetration and evolving energy landscape.

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?

Landis+Gyr considers the current definition of real-time data in the draft rule to be broadly sufficient and fit for purpose. However, we recommend that the AEMC avoid prescribing overly granular technical specifications—such as mandating specific data transfer methods (e.g. push vs pull), phase angle definition or minimum sampling frequencies—within the rule itself.

Instead, we advocate for an outcomes-based approach, which allows flexibility for industry stakeholders, in collaboration with AEMO, to develop a technical specification that meets the intended policy objectives. This approach enables innovation, accommodates diverse technology

platforms, and avoids locking in solutions that may become obsolete or incompatible with future developments.

By focusing on the desired outcomes—such as timely, secure, and reliable access to real-time data—rather than rigid technical parameters, the AEMC can foster a more adaptive and cost-effective implementation across the market.

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 support a good customer experience for customers requesting access?

We will defer to other stakeholders to respond to this question.

Question 9: Would our draft rule introduce appropriate security measures to protect customer information from being accessed by unauthorised parties?

We will defer to other stakeholders to respond to this question.

Our focus is on providing leading technology and energy management solutions with advanced features, aligned with a vision to support future industry requirements. We always welcome the opportunity to collaborate with participants and stakeholders to understand their long-term needs, which inform our product roadmap. Accordingly, we are excited to contribute to this consultation.

Landis+Gyr is keen to support this process to help achieve the best possible outcomes for customers. Thank you for the opportunity to provide this information. We look forward to assisting you with any further questions you may have. In the meantime, please do not hesitate to contact Opi Taumalolo opi.taumalolo@landisgyr.com