

23 October 2025

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

Dear Sir/Madam

Re: Real-time data for consumers, Draft rule determination

As the Distribution Network Service Provider (**DNSP**) in Tasmania, TasNetworks appreciates the opportunity to comment on the Australian Energy Market Commission's (**AEMC**) draft rule to enable access to real-time data (**RTD**) from smart meters.

TasNetworks agrees that the availability of RTD has the potential to help consumers make more informed energy choices and better manage their consumer energy resources (**CER**). RTD will also enable other services that deliver value for consumers, such as services that support the integration of CER into the grid and help lower overall system costs. TasNetworks is, therefore, supportive of efforts to make metering data available in real time.

However, some elements of the draft rule may reduce the customer benefits from the improvements in distribution network services that the widespread availability of RTD could enable. The areas of specific concern for TasNetworks relate to costs and benefits for customers, customer consent, and data security and reliability.

Costs and benefits

TasNetworks is concerned that while all retail customers will ultimately pay more for metering under the proposed changes to the specification of type 4 and type 4A meters, the benefits of RTD may only reach a small group of customers. These are likely to be those already interested in actively managing their electricity usage and/or CER. TasNetworks' research shows that fewer than 10 per cent of Tasmanian residential customers are both willing and able to manage their electricity consumption to reduce their bills or environmental impacts. This suggests most small customers in Tasmania are unlikely to seek real-time access to their metering data.

The smart meter rollout in Tasmania is more than 90 per cent complete and on track to finish before meters with RTD capabilities would become mandatory under the draft rule. This aligns with the Tasmanian Government's commitment that every Tasmanian home and business should have an advanced meter by the end of 2026. Most meters installed as part of the rollout will remain in service until the 2040s, which means that Tasmanian customers who want RTD access after 1 January 2028 may need to replace their meters early, at additional cost.

Customer consent

TasNetworks considers the proposed requirement for DNSPs to obtain consent from every customer to access their RTD is unnecessary, inefficient and likely to be cost prohibitive. Services such as network fault finding, fault response, neutral integrity fault detection and outage notifications would all benefit from the availability of RTD. However, these use cases rely on DNSPs being able to access RTD for most, if not all, customers. Requiring individual customer consent may prevent or discourage DNSPs from doing so, diminishing the customer experience, wider community safety and DNSPs' visibility of their low voltage networks. Alternatively, DNSPs may invest in alternative means of gathering similar information, resulting in additional costs and duplication of data.

In TasNetworks' view, there is a significant difference between operating the shared network and the provision of goods and services to individual customers, in terms of the nature of the relationship and the type of consent required. We consider that there is a strong case for DNSPs not to have to obtain customer consent before accessing RTD in relation to the provision of standard control services, noting that DNSPs already access customers' metering data and, from 1 July 2026, will be able to access their basic power quality data without needing explicit customer consent.

If consent is required, an approach may be to obtain it en masse through a retailer or metering coordinator (as the AEMC noted in its consultation paper regarding this rule change). Retailers could seek consent from the customer before initiating a request to a metering coordinator to provide RTD access, meaning that the retailer would have consent from the customer on record. Retailer would have an additional benefit of protecting rejecting vexatious requests to access RTD to protect customers who may be experiencing family violence.

If metering parties control RTD access, additional considerations should be made to ensure DNSPs can access RTD on fair and reasonable terms. If DNSPs must rely on commercial negotiation, their limited bargaining power may lead to higher than necessary costs for both DNSPs and customers.

Data and security

Metering data is considered confidential and must be treated as such in accordance with the National Electricity Rules. Metering Coordinators are responsible for ensuring that metering installations are secure and that associated links, information storage and processing are protected from unauthorised access. As authorised recipients, DNSPs must also apply appropriate data protections.

While accessing RTD from a smart meter via Wi-Fi may appear low-cost, it introduces security and reliability risks. Customer Wi-Fi networks are generally less secure and stable than the communication networks used by the electricity supply industry and potentially more vulnerable to consumer interference or cyber threats.

DNSPs could also lose connection visibility without the ability to restore it, limiting their ability to monitor or respond. While some devices have fail-safes, the instability and unknown security of customer Wi-Fi remain key concerns.

The AEMC has undertaken extensive work to improve customer access to smart meter data. TasNetworks supports this intent but considers the draft rule limits the broader, long-term benefits DNSPs could deliver through access to RTD. We encourage the AEMC to further consider DNSP access in light of potential benefits and costs to customers.

To discuss the views expressed in this submission please contact Alex Burk, Leader Regulation, at Alex.Burk@TasNetworks.com.au.

Yours faithfully



Sandra Thaow
Acting Head of Regulation