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Draft Rule Determination – *Enhancing Distribution Network Planning and Reporting*

Introduction

1. Bluecurrent welcomes the opportunity to provide feedback on the AEMC's draft rule determination for *Enhancing Distribution Network Planning and Reporting* (EDNPR). As a leading data services and infrastructure partner managing more than 2.6 million advanced smart meters across Australia and New Zealand, Bluecurrent provides data infrastructure that supports efficient network and electricity market operation.

2. Bluecurrent supports the AEMC's objective of improving distribution network planning and reporting, including through the proposed Distribution Network Development Plan (DNDP). Better visibility of the historical, current and expected state of the low-voltage distribution network will be important to support the efficient integration of Consumer Energy Resources (CER) and better long-term planning outcomes.

3. However, the final framework should also preserve incentives for Metering Service Providers (MSPs) to continue developing new data products, analytics capability and network support tools. Advanced metering data services require ongoing investment in product development, systems, data processing, telecommunications, testing and ongoing service and support. Where those services deliver value for distribution networks, there should be a clear pathway for them to be commercially procured rather than progressively absorbed into baseline reporting obligations.

4. If emerging advanced services are treated as standard compliance obligations, MSPs will likely have less incentive to invest in the next generation of network visibility tools, outage detection capability, power quality analytics and other services that could support more efficient network operation over time. Preserving a clear distinction between baseline obligations and advanced services will therefore help ensure the framework supports both improved network visibility and continued market-led innovation.

A consumer-centric vision for strategic network planning

5. Bluecurrent supports the transition to a longer-term, 20-year strategic planning framework through the new DNDP. A modern, consumer-focused system requires stronger and more forward-looking visibility of the distribution network, particularly as CER uptake increases and network operating conditions become more dynamic.

6. Improved visibility of the low-voltage network can support more efficient planning, better identification of constraints and more targeted investment decisions. It can also help distribution networks understand where additional capability may be needed to manage changing demand patterns, improve utilisation of existing assets and support the efficient integration of CER.

7. As a data services innovator, Bluecurrent continues to invest in advanced capabilities, including high-frequency data, advanced power quality data and residential outage detection. These capabilities are aligned with Bluecurrent's purpose of enabling smarter energy outcomes and supporting consumer needs through the energy transition.

Practical data delivery and cost considerations

8. We note that the specific reporting fields, data requirements and levels of granularity under Rule 5.13A will be developed through subsequent consultation and guideline-setting led by the Australian Energy Regulator (AER). To support that process, Bluecurrent sets out the following implementation and cost considerations.

    - **Requirement for more advanced data:** To support the 20-year capacity and constraint forecasting envisaged by the DNDP, distribution networks may in some cases require access to granular, validated datasets that go beyond baseline monitoring. These services can provide important value where linked to clearly identified network planning or operational needs.

    - **Cost and investment requirements for advanced services:** While basic power quality data provides a standardised baseline for essential grid safety, more complex, high-frequency network data services require a different level of investment. These services are developed to support DNSP network planning and operational use cases, rather than retailer requirements. The associated costs are not shared with retailers. Extracting, validating and transmitting granular datasets, such as 5-minute interval metrics, requires upfront investment in backend processing and ongoing expenditure on cloud storage, systems architecture and secure telecommunications backhaul. A clear procurement pathway is therefore important to preserve MSP incentives to keep investing in new data capabilities.

    - **Need for proportionate obligations:** Reporting obligations should be proportionate to likely network and consumer benefit. Highly prescriptive requirements for complex datasets may create unnecessary cost if the same planning outcome can be achieved through lower-frequency or more targeted data. The guideline process should allow the AER to assess the value, cost and practicality of different data requirements.

Preserving incentives for innovation in advanced network data services

9. The EDNPR framework should recognise that advanced metering data services are continuing to evolve. MSPs invest in new products, system capability and data services that can help DNSPs understand and manage the low-voltage network more efficiently. These investments require confidence that, where new services deliver value, there will be a clear pathway for them to be commercially procured rather than absorbed into baseline reporting obligations.

10. This is important because the commercial case for innovation depends on MSPs being able to recover the cost of developing, testing and operating new data capabilities. Advanced services often require significant investment before they can be made available at scale, including in data validation, system integration, telecommunications capacity, cyber security controls, reporting interfaces and operational support.

11. If emerging services are treated as standard compliance obligations too early, this could weaken the incentive for MSPs to invest in the next generation of network visibility tools. Over time, this may reduce the range of data products and support services available to DNSPs and slow the development of capabilities that could support more efficient network operation, improved outage response, better power quality management and more effective CER integration.

12. Bluecurrent therefore considers that the EDNPR framework should operate consistently with the principles reflected in the AEMC's *Accelerating Smart Meter Deployment* rule change: basic data forms part of the compliance baseline, while more advanced data services remain subject to targeted procurement where they are needed and deliver net consumer benefit.

13. The AER's recent five-year revenue determinations also show that DNSPs can obtain regulated allowances for smart meter data acquisition and associated capabilities to support improved low-voltage network visibility. This provides a practical precedent for preserving a distinction between baseline obligations and advanced services that should continue to be procured where they are needed and economically justified.

14. This approach also supports consumers. Competitive procurement helps DNSPs obtain the level of data granularity required for clearly identified network outcomes, while reducing the risk of unnecessary cost escalation. More importantly, it preserves the incentive for MSPs to keep developing better tools and services that can support future network needs.

15. For these reasons, Bluecurrent recommends that the AEMC recognise in its final determination that the framework should preserve a clear distinction between baseline reporting obligations and more advanced data services. That distinction is necessary not only to manage cost and proportionality, but also to support continued innovation in the metering data services market.

A collaborative commitment to early engagement

16. Given the lead times required to design, test and enable advanced data capabilities within metering infrastructure, Bluecurrent would welcome early engagement with both the AEMC and the AER ahead of formal guideline development.

17. Bluecurrent would value the opportunity to contribute through workshops and technical discussions to support a shared understanding of data architecture, delivery costs, implementation requirements and net consumer benefit. Early engagement will help ensure the guideline process is informed by the practical realities of developing and delivering advanced metering data services at scale.

Yours sincerely,

Richard Fink
Acting Chief Executive Officer

Attachment: Responses to Relevant Draft Determination Questions

Question 4: Does the purpose provide appropriate guidance on the scope of the framework?

1. Bluecurrent supports the framework's purpose of improving visibility of network constraints and available capacity to support efficient market decisions. Better distribution network planning and reporting will be important as CER uptake increases and distribution networks face more dynamic operating conditions.

2. However, because much of the operational detail will be developed through the AER's guideline process, the scope of the framework should be clearly defined. In particular, the framework should not unintentionally convert advanced metering data services into baseline reporting obligations. This would risk blurring the distinction between core compliance requirements and services that require additional investment, product development and commercial procurement.

3. That distinction matters because advanced data services are not simply existing datasets that can be provided at no additional cost. They often require new data processing, validation, telecommunications, storage, system integration and operational support capability. These services are generally developed to meet DNSP planning and operational needs, rather than retailer requirements, and the associated costs are not shared with retailers.

4. Preserving a clear procurement pathway is also important to maintain incentives for MSPs to continue investing in new capability. If emerging services are progressively absorbed into baseline obligations, MSPs will have less incentive to develop new data products and network support tools. This could reduce the future range of services available to DNSPs and slow innovation that may support more efficient network operation and CER integration.

Recommendation: The AEMC should make clear in the final determination that the EDNPR framework is intended to improve network planning and visibility, while preserving a clear distinction between baseline data obligations and more advanced data services. Advanced services should continue to be commercially procured where they are needed, justified and capable of delivering net consumer benefit.

Question 5: Does the draft rule provide appropriate guidance for the AER when preparing the guidelines?

Bluecurrent supports the draft rule requirement that the AER consider the net economic benefit of compliance with the guidelines. This is a critical safeguard for maintaining system efficiency and ensuring reporting obligations remain proportionate to the value they deliver.

In preparing the guidelines, the AER should take a whole-of-supply-chain view of the costs and benefits of more granular distribution network data. This should include the IT, data storage, validation, systems architecture and telecommunications backhaul costs incurred by the metering industry to deliver more advanced data services.

These costs arise because advanced network data services are developed to support DNSP planning and operational use cases. They are not generally retailer-driven services, and the associated costs are not generally shared with retailers. The AER's net economic benefit assessment should therefore avoid treating advanced network data services as if they were part of the standard retailer-funded metering service.

The guidelines should also preserve incentives for future innovation. The AER's assessment should consider not only the immediate cost of compliance, but also the dynamic benefits of continued MSP investment in new data services. Guidelines that require advanced services to be provided as baseline obligations, without a clear procurement pathway, may reduce incentives for MSPs to develop new products and capabilities that could support more efficient network operation over time.

The AER's guidelines should be guided by the following principles:

- **Whole-of-supply-chain cost assessment:** The AER should consider the full costs incurred across the metering data supply chain, including data extraction, validation, processing, telecommunications, storage, cyber security and operational support.

- **Recognition of network-specific use cases:** The AER should recognise that advanced data services are often developed for DNSP planning and operational needs, rather than retailer requirements.
- **Proportionality and consumer outcomes:** Reporting obligations should remain proportionate to likely consumer benefit. Highly prescriptive publication of complex datasets should not be required where lower-frequency planning metrics would be sufficient.
- **Preservation of innovation incentives:** The guidelines should avoid converting emerging advanced services into baseline obligations before their value, cost and use cases have been properly assessed.
- **Flexibility in data requirements:** The guidelines should allow for different levels of data granularity depending on the planning need, maturity of capability, cost of delivery and expected network or consumer benefit.

Recommendation: The AER's guidelines should apply a proportionate, whole-of-supply-chain assessment of the costs and benefits of any data requirements. They should also preserve a clear pathway for advanced metering data services to be commercially procured where they are needed and deliver net consumer benefit.