ENERGY CONSUMERS AUSTRALIA

AEMC Consultation paper – Real-time data for consumers rule change

Submitted by: Melissa McAuliffe

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Access to real-time data benefits all consumers, and the needs of a successful energy transition.

As the national voice for residential and small business energy consumers, Energy Consumers Australia submitted the rule change proposal on Access to real-time data for consumers and their authorised representatives' to provide consumers and their authorised representatives the tools necessary to make informed energy decisions based on their needs and circumstances, and help deliver a lower cost energy transition for everyone.

The proposal has three fundamental components:

1) altered regulations that will enable consumers and their authorised agents to access 'customer power data.'
2) a requirement for these data to be real-time, with real-time to be defined in the NER.
3) a commitment that access comes with no additional cost to consumers and is delivered in a manner and form that enables them to understand their consumption and thus make informed decisions.

We appreciate the AEMC's swift response to ECA's proposal and its dedication to a thorough consultation process.

The AEMC consultation paper notes that since the Review of the regulatory framework for metering services there have been significant market developments, and therefore a need to retest the case for change.[1] It is unclear to us what material changes have occurred to inform this position. Rather, we consider recent developments only amplify the need for the real-time data proposal: e.g., the public interest in and concern over smart meter installations and their impact on consumer bills,[2] complementary rule change consultation processes either complete or underway,[3] as well as the acknowledged value of real-time data identified in the AEMC *Narrative*.[4]

Providing consumers access to their real-time data is a foundational step toward building trust (broadly and for the rollout of smart meters), helping to deliver the energy transition, and supporting consumers in potentially lowering their electricity costs, especially during times of financial strain and higher energy bills. ECA have long supported the acceleration of smart meters and see consumers being able to access their real-time data as the important and necessary next step.[5]

We thank the AEMC for both the opportunity to submit the rule change proposal and respond to the consultation paper questions below. For any queries regarding this submission, please feel free to contact me on melissa.m@energyconsumersaustralia.com.au.

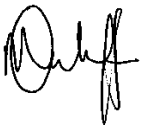
[1] AEMC Consultation paper – Real-time data2024 https://www.aemc.gov.au/sites/default/files/2024-10/Consultation%20paper%20-%20ERC0399%20Real-time%20data%20for%20consumers.pdf pi

[2] For example media articles; ABC April 2024 https://www.abc.net.au/news/2024-04-09/energy-companies-under-fire-over-time-of-use-rates/103655324 Your Life Choices (50+ publication) May 2024 https://www.yourlifechoices.com.au/finance/energy-retailers-exploit-legal-loophole-to-change-power-prices-without-warning/ Choice, June 2024 https://www.choice.com.au/shopping/shopping-for-services/utilities/articles/agl-demand-tariffs

[3] As identified in the AEMC Consultation paper 2024 https://www.aemc.gov.au/sites/default/files/2024-10/Consultation%20paper%20-%20ERC0399%20Real-time%20data%20for%20consumers.pdf p3

[4] AEMC *Narrative* https://www.aemc.gov.au/sites/default/files/2024-10/AEMC_narrative_150824_v6%20%28002%29%20as%20of%2010%20October%202024.pdf p24

Kind regards



Melissa McAuliffe
Executive Manager, Advocacy and Policy
Energy Consumers Australia

Response to consultation questions

Q.1 – What are the benefits of improving access to real-time data?

The widespread roll-out of smart meters will enable the capture of more granular data on the unique energy use profile of each household and small business. Providing consumers and their authorised representatives with access to real-time data in a format that can be easily used will help:

- overcome historical disengagement by consumers with their consumption
- improve domestic / small business demand management
- reduce consumption and thus lower bills
- enable better appliance choice and utilisation
- improve load profile by encouraging consumption to shift to less utilised bands
- provide consumers a value proposition for the smart meter rollout (which otherwise may well be entirely lacking) therefore helping to build to social licence for the rollout and the energy transition more broadly.
- support better integration of CER into the grid, reducing the need for more infrastructure investment.

1) Helping consumers lower their energy bills

1.1) Access to real-time data provides consumers agency to make optimal energy decisions.

Early findings from ECA's upcoming survey indicate that consumers want information that could be provided by real-time data, which they believe will help them understand their energy use and allow them to change their behaviour.

- 83% of consumers are either extremely or quite interested in technology that could help them run appliances at times when it's cheaper.
- 81% of consumers are either extremely or quite interested in being able to track their energy usage whenever they want to.
- 79% of consumers are either extremely or quite interested in technology that allows them to track how much energy they use in real-time. (Only 4% were not interested at all.)

These findings are consistent with research conducted by ECA on household information needs in 2023.[6]

Studies have shown that real-time data supports consumers in better understanding their energy consumption, helping them to make optimal energy decisions. For example, over five years, Energy Think Tank VaasaETT conducted extensive international studies on Demand Response programs to understand how to best empower consumers to reduce consumption. It found that successful programs require providing a customer with feedback in real-time (through websites, apps or in home displays).[7]

[6] Energy Consumers Australia, Household Energy Consumer Information Research 2023 https://energyconsumersaustralia.com.au/wp-content/uploads/Household-Energy-Consumer-Information-Research-Nov-2023.pdf
[7] VaasaETT 'Empower Demand 2' p41 Microsoft Word - Final_Empower 2_Demand_Report_FINAL_Distr2.docx p1

Investments have been made by some retailers into demand response programs. However, enhancing them with real time feedback would unlock the currently unrealised benefits for consumers and the subsequent benefits to the system overall.

Research indicates that if done well these programs can also 'lead to year-on-year increases in savings and increased interest and participation in other programs that can help [consumers] lower their bills'.[8] In addition, studies have also shown that greater engagement by consumers with their energy use can act as a gateway to lasting savings by consumers investing in more energy efficient products and making home improvements.[9]

1.2) Access to real-time data can help drive equitable outcomes.

Real-time data access provides a way for all Australian households to see their energy use and reduce their bills. As a result, it can help to bridge the energy divide, in which some consumers, particularly those with limited or no access to CER, continue to face higher energy bills while those with ability to access new technologies reduce their bills to at or near zero.[10]

The AEMC's consultation paper states that some consumers already have access to real or near real-time data.[11] While true for some, these consumers often pay an additional cost for a separate metering device as part of their CER installation. We do not think this is a fair outcome for consumers, given there is a meter already at their premise (that they pay for) that could do the same job. Without the ability to exhibit this information at a consumer's home in a usable form the value of the data collected by smart meters is significantly eroded for consumers.

Moreover, while the data is collected in real time at the consumer's premise, it cannot be displayed there in real time. Current regulations and agreements require the data to be sent off premise, ingested, and then shared back with the consumer after a lag of 24 hours or longer. Given the consumer is paying for the smart meter and the meter collects real-time data, an equitable outcome would be to give the consumer real-time access to their data at their premise.

1.3) Access to real-time data is required for cost reflective pricing.

'With one in four Australian homes now having solar panels, and predictions of one in two by 2040, we need to ensure our pricing frameworks keep pace with how consumers want to use and interact with the energy system".[12]

Not all households have the capacity, ability or motivation to respond to time-of-use or demand tariffs. But all consumers should have the tools required to allow them to participate in such pricing options should they choose to opt in.

An Irish study of 4000+ participants looked to understand the potential of technology sharing smart meter data (an In-Home Display) combined with time-of-use tariffs. The study found that 84% of

[8] For example, In Massachusetts, programmes with National Grid and NSTAR in collaboration with Opower, which achieved savings from opt-out programs of between 1.25% to 3% per household across over 300,000 households, found that savings have persisted and grown by as much as 30% year-on-year. VaasaETT 'Empower Demand 2' p41 Microsoft Word - Final_Empower 2_Demand_Report_FINAL_Distr2.docx

[9] 'Written evidence by Smart Energy GB' SME0019 - Evidence on Smart meters, VaasaETT 'Empower Demand' 1 2012 p28 https://www.esmig.eu/wp-content/uploads/2021/11/ESMIG-Empower-Demand-report-phase-I.pdf

[10] Energy Consumers Australia, Understanding the energy divide Explainer 2023 https://energyconsumersaustralia.com.au/wp-content/uploads/Understanding-the-energy-divide-1.pdf

[11] AEMC Consultation paper – Real-time data2024 https://www.aemc.gov.au/sites/default/files/2024-10/Consultation%20paper%20-%20ERC0399%20Real-time%20data%20for%20consumers.pdf

[12] AEMC Consumer focused pricing review, Media Release 2024 https://www.aemc.gov.au/news-centre/media-releases/aemc-progresses-next-step-consumer-focused-pricing-review

participants stated that the real-time monitor feedback helped them to reduce the amount of electricity they used, with 74% becoming more aware of electricity used by appliances.[13]

This study also pre-surveyed participants and found that 'customers are not good at estimating the proportion of their usage during peak or translating between a tariff and the bill impact.'[14] Indeed, ECA's ECSS results show that 36% of consumers are not sure what tariff they are even on,[15] much less how they might best be able to shift their energy use to reduce their bill.

Imposing cost-reflective pricing on consumers without equipping them with the tools to respond is unfair and ineffective. Ensuring that all consumers have access to real-time data from their smart meters will provide interested consumers with the information they need to respond to time variant pricing, supporting a fairer, more affordable energy transition.

2) Real-time data can improve trust and social licence

The AEMC notes in their recent report, "*A Consumer-Focused Net Zero Energy System*," that 'confidence and trust have become enablers of the energy transition.'[16] Yet energy consumer confidence in the market remains under 40%.[17] Due care is therefore required to ensure social licence if the acceleration of smart meters is to be successful and contribute positively to broader consumer sentiment.

The Newgate metering research found the most valued benefit of a smart meter was the ability for a consumer to monitor usage in real-time. However, this benefit was often not known to participants, particularly those without a smart meter. Once this (and other benefits) became known, their sentiment shifted to be significantly more positive.[18] If a key consumer benefit cannot be realised at the time of installation or without clear plans for this to be made available, consumers will rightly question the necessity of the installation. They are likely to wonder why they are paying for a smart meter, and their trust and willingness to participate more broadly in the transition may be hindered.

Given the importance of trust and social licence to the acceleration of smart meters and the transition more broadly, we have recommended social licence as an additional assessment criterion under Question 12.

3) Real-time data can support the integration of CER into the grid, benefiting all consumers

The Integrated System Plan recognised that CER will likely be the largest component of generation capacity, storage and flexible load in the National Electricity Market (NEM) by 2050.[19] However, '*without co-optimisation between demand and supply, there may a risk of over-estimating how much large-scale*

[13] Vaasa Global Energy Think Tank 'Empower Demand Report Phase I 2012, https://www.esmig.eu/wp-content/uploads/2021/11/ESMIG-Empower-Demand-report-phase-I.pdf p51
[14] Ibid
[15] Energy Consumers Behaviour Survey, October 2023 https://energyconsumersaustralia.com.au/publications/surveys-energy-consumer-sentiment-behaviour
[16] AEMC Narrative 2024 https://www.aemc.gov.au/sites/default/files/2024-10/AEMC_narrative_150824_v6%20%28002%29%20as%20of%2010%20October%202024.pdf
[17] Energy Consumers Australia ECSS https://energyconsumersaustralia.com.au/publications/surveys-energy-consumer-sentiment-behaviour
[18] Newgate Research -AEMC Metering Review Full Report 2021 https://www.aemc.gov.au/sites/default/files/documents/newgate_research_full_research_report_-_metering_review.pdf
[19] AEMO Integrated System Plan 2024 https://aemo.com.au/-/media/files/major-publications/isp/2024/2024-integrated-system-plan-isp.pdf?la=en

generation and new transmission will be necessary'.[20] This will come at a cost to consumers, rather than capitalising on the potential to lower network costs for consumers. Real-time data can help a Distribution Network Service Provider (DNSP) to more accurately reflect the condition of the network, enabling them to allow higher penetrations of consumer exports of solar into the system without fearing impacts on network operations/reliability.[21]

As part of Project EDGE, Deloitte Access Economics provided a Cost Benefit Analysis which found that '*greater coordination of active DER (CER) in the NEM will result in an incremental benefit of up to $5.15 - $6.04 billion over the next 20 years in reduced cost to all electricity consumers, as well as societal benefits of $3 billion in emission reductions.'*[22]Access to real-time energy data is critical for greater coordination of CER, because it allows consumer devices to respond (or account for) the real-time conditions of the network. Simultaneously, it enables DNSPs to better understand the real-time condition of their network at a more granular level than before.

Real-time data has the ability to improve the accuracy of dynamic operating envelope calculations, ensuring consumers with CER can benefit from the full use of the network, which in turn increases efficient use of the network, lowering network expenditure costs and benefiting everyone, regardless of their ability to actively participate in the transition.[23] Ensuring a robust system that supports CER integration and network optimisation clearly meets the National Electricity Objectives by benefiting the long-term interests of consumers and significantly helping to reduce emissions.

In addition, real-time data can support a more responsive outage and emergencies process.[24] This type of service has multiple benefits, including a better, potentially life-saving service for customers who use life support equipment. Across 4000 surveyed life support customers it was found that only 7% had access to back-up power, and that 68% of customers mistakenly expected priority power restoration within 2 hours.[25] As extreme weather conditions are predicted to become more likely, tools which improve the response time to outage and emergency services are critical.[26]

[20] G Kuiper and J Bowyer, Institute for Energy Economics and Financial Analysis 'Integrated System Plan needs greater ambition on DER to be a true whole-of-system plan 2024 https://ieefa.org/resources/integrated-system-plan-needs-greater-ambition-der-be-true-whole-system-plan

[21] Project EDGE 'Determining the impact of update frequency on operating envelope efficacy workstream' 2023 https://aemo.com.au/-/media/files/initiatives/der/2023/project-edge-determining-the-impact-of-update-frequency-on-operating-envelope-efficacy--workstream-3.pdf?la=en p44

[22] Deloitte 'Project EDGE Cost Benefit Analysis 2023 https://aemo.com.au/-/media/files/initiatives/der/2023/independent-cba-webinar-slides.pdf?la=en

[23] The Dept of Energy and Climate Change UK, additional smart meter benefits a "more responsive demand solutions (that) minimise the impact of significant penetrations of EVs and HP, for which DNO would require real-time data" https://assets.publishing.service.gov.uk/media/5a7c3dd5ed915d76e2ebc074/smart_meter_roll_out_for_the_domestic_and_small_and_medium_and_non_domestic_sectors.pdf p61

[24] As detailed in Essential Energy's submission to the 'Review of the regulatory framework for metering services – Draft report' https://www.aemc.gov.au/sites/default/files/2023-02/Essential%20Energy%20submission%20AEMC%20Metering%20Review%202023%20-%20Final.pdf p13

[25] The Australian Energy Foundation Report 'Better outcomes for energy consumers using life support equipment at home' 2022 accessed https://www.theenergycharter.com.au/life-support/

[26] Jill Cainey 'Approaches to network electricity resilience and consumer electricity resilience' 2024 report-consumer-electricity-resilience-jill-cainey.pdf

Q.2 – What are the costs of improving access to real-time data?

The benefits of improved access to real-time data will outweigh their costs when properly considered.

As noted in our rule change proposal, retailers and metering service providers would incur costs associated with facilitating access to real time data. The level of costs will depend on the nature of the obligation to facilitate access and whether the obligation is applied to the existing fleet of meters. However, we note that the cost of complying with any new obligations will likely:

- flow through to consumers in the form of indirect charges via customers' retail bills, and/or
- be recovered from third party service providers, subject to any constraints imposed under the rules.

In considering the costs of providing improved access to real-time data, the Commission should ensure they examine these incremental costs relative to the overall costs of the smart-meter rollout. Consumers are paying for the overall smart meter rollout. While some parties are concerned about the incremental costs of providing access to real-time data, these costs need to be considered within the context of the overall costs of the smart-meter rollout.

While there will be additional costs to improving access to real-time data, these costs should be minor relative to the cost of collecting and gathering the data in the first place. Consumers are paying the upfront cost for the meters themselves along with the additional hardware and software tools required to share that data among various energy parties.

Our understanding is that a fair amount of what some see as "cost" is the administrative burden of sharing data that has already been collected between multiple entities, including retailers, networks, market operators, metering providers and consumers. The cost of sharing consumer data among these entities just so consumers benefit fully from that data should not be a material cost in an efficient market and should not be borne by consumers.

When assessing the costs raised by stakeholders, the AEMC should also consider the potential downstream benefits that impacted parties (such as retailers) may gain from any additional investment required to enable the full rule change. Enhanced service and app functionality, for instance, has the potential to deliver advantages, that can balance out costs such as:

- **Unique Value Propositions**: Additional features and services (that utilises real-time data), may help set retailers apart, making them more appealing to consumers.
- **Reducing overall cost to serve**: When consumers have easy access to self-service options, they may be more inclined to engage directly with the app or portal for tasks like data access, self-meter reads (for Gas), or setting up payment plans—which may reduce calls in the call centre, complaints and overall cost to serve.[27]

The benefits that real-time data can provide consumers, and the overall energy transition, outweigh the likely costs.

[27] LECG, Advanced Metering Infrastructure and related services in NZ 2008 https://www.aemc.gov.au/sites/default/files/content/48cc3378-db32-4c23-8af5-21df33a8d625/LECG-Report-On-Developments-In-The-New-Zealand-Market-For-Advanced-Metering-Infrastructure-And-Related-Services-16-July-2008.pdf p16

Q.3 – Do metering parties currently have a competitive advantage?

As noted in our rule change proposal, we have heard concerns from some third-party providers that some metering service providers are developing proprietary hardware and software to offer services to consumers that leverage the metering platform. This additional functionality can only be used by the metering service provider and makes it difficult for third parties to compete on a level play field, even if they have access to real time data.

While our rule change request did not propose a solution to this issue, the AEMC should consider which amendments to the NER are required to facilitate a competitive market that will deliver innovative and low-cost services to consumers. For consumers to trust service providers that are controlling appliances and CER in their homes and businesses, consumers must be confident that the market is working for them. Services need to be innovative and low cost, and consumers must not be locked in or limited to a small number of providers – they should be able to shop around in a competitive market with real choice.

Unlike the supply of electricity, flexibility services are not an essential service and so if consumers do not have a positive experience, they may not participate. This would reduce opportunities for individual consumers to manage their bills and would have a wider negative impact of reducing potential sources of flexible capacity for the system. Access to consumers' real time data by authorised third party service providers on reasonable terms and conditions is a necessary element of a competitive market.[28]

Q.4 - Do DNSPs need more than PQD [power quality data] to improve network planning and operation?

DNSPs need more data to better plan and operate their low-voltage networks.

Yes, DNSPs need access to better power quality data to improve their planning and operations, and better planning and operations should reduce the overall costs of the distribution network, which is the most expensive part of the household bill.[29]

The need for greater visibility into the distribution system has long been identified as a gap in energy sector planning and reporting. Several reports, most notably the Energy Security Board's 2021 Data Strategy,[30] have highlighted this need. A report by the RACE for 2030 Cooperative Research Centre focuses on the need for greater low-voltage network visibility and notes that greater visibility enables low-cost improvements in networks' ability to host consumers solar, batteries, and electric cars, stating that "even a 2% increase in hosting capacity providing consumer benefit of $50M/annum." [31]

[29] AEMC, Residential Electricity Price Trends Report, 2021. Available at: https://www.aemc.gov.au/sites/default/files/2021-11/2021_residential_electricity_price_trends_report.pdf
[30] Energy Security Board, Data Strategy, 2021. Available at: https://esb-post2025-market-design.aemc.gov.au/data-strategy#esb-data-strategy
[31] RACE for 2030, "Low-voltage network visibility and optimizing DER hosting capacity," 2021. Available at: https://issuu.com/racefor2030/docs/n2_oa_project_final_report_2021

Q.5 - Who should have a right to real-time data in the NER?

Consumers should be given a clear right to access their real-time data. This access should extend to authorised representatives.

A right should be established that ensures small customers and their authorised representatives have access to all customer power data measured by or recorded in their smart meter. We have defined customer power data as:

"*Power quality data and any other category of data specified in the relevant AEMO procedures as customer power data*"[32]

Q.6 – How should real-time data be defined

"**Real-time" data is instantaneous data, or data received no later than five minutes**

In the five-minute settlement final determination, it notes that, 'five-minute settlement will better ensure that demand response occurs within the dispatch interval when it is needed (with) consumers being appropriately rewarded for their ability and willingness to provide the service'.[33] While the investment has been made in improving accuracy, responsiveness and efficiency in the supply side, limited attention has been given to the demand side. We consider instantaneous data to be what we should aim to achieve, however, note, within five minutes will still significantly improve the outcome for consumers, and the system.

With this in mind, ECA proposed that 'real-time' be defined as time *which is sufficiently fast to allow for consumers' authorised representatives to access the information, they need in the time they require to provide the service they are offering, or to inform consumers' energy consumption decisions*. In any event, we noted, this definition should not exceed 5 minutes (to coincide with market settlement) and that the delivery period is based on receiving the data, not when it needs to be sent by.[34]

We also recommend there be an easy pathway for reviewing the definition, so to respond to any technological advancements and that it remains fit for purpose.

Q.7 – How should real-time data be accessed and shared?

Data access should be easy, accessible and delivered in a meaningful way to consumers.

Accessing and sharing the data must be done in a way that meets the intent of the rule change in providing consumer benefit and improving the ability to easily understand and manage energy consumption. To achieve this, the proposal provides several changes that may be required to enable access to customer power data:[35]

- Changes to the NER 7.15.5 to enable a right to access.

[32] ECA Rule Change Proposal 2024 https://www.aemc.gov.au/rule-changes/real-time-data-consumers p11
[33] AEMC Five Minute Settlement Final Determination https://www.aemc.gov.au/sites/default/files/content/97d09813-a07c-49c3-9c55-288baf8936af/ERC0201-Five-Minute-Settlement-Final-Determination.PDF p15
[34] ECA Rule Change Proposal 2024 https://www.aemc.gov.au/rule-changes/real-time-data-consumers p10
[35] ECA Rule Change Proposal 2024 https://www.aemc.gov.au/rule-changes/real-time-data-consumers p6

- Customer power data to be defined as personal information.
- Amendments to the minimum service specifications schedule 7.5 of the NER with small customers and their authorised representatives defined as access seekers.
- Amendments to the NER to unlock barriers to local assess to customer power data. For example:
    - all new meters to have communications ports that are physically capable of being accessed, and locally, and
    - communications ports on new smart meters to be unsealed and available for access by approved parties.

Enabling local access will likely be the best way for data to be received in true real-time. In either remote or local access, facilitation of the data to the consumer needs to be seamless, and the final rule change should eliminate any complexity, not add to it. For this reason, we argued that the AEMC's proposed 'opt-in' approach only marginally better than current state.[36]

Enabling access may place an onus on stakeholders such as energy retailers to provide interface solutions. However, many retailers already offer such platforms that could then be enhanced (and perhaps more appealing to the market) to meet new access requirements.

Q.8 – Who should bear the costs of accessing real-time data?

Consumers should be able to access their real-time data at no cost.

Customer power data is data created by a customer, who already pays for, or contributes to the costs of metering installations through their energy bill. No additional costs should be incurred by a consumer in accessing their own data.

It may be reasonable to charge a small fee for authorised parties to access data; however, the cost should not be for the data itself. Given the potential power imbalance between authorised third parties and metering service providers, a detailed access framework must be developed and set out in the NER. This framework should include dispute resolution pathways, and compliance mechanisms to ensure relevant parties adhere to the terms and conditions of access. Any framework, however, should not place onus on the consumer to ensure they are receiving a compliant and adequate service.

Q.9 – What changes would be required to ensure interoperability?

The smart meter must enable customer power data to be communicated in a secure environment and in "language" that can be read by other devices.

Current minimum service specifications under the NER do not require smart meters to have open standards-based protocols, standards-based communication interfaces and a defined security

[36] ECA Rule Change Proposal 2024 https://www.aemc.gov.au/rule-changes/real-time-data-consumers p11

environment. Amendments to schedule 7.5 of the NER is therefore required to facilitate a seamless, interoperable and protected process for real-time data communication.[37]

Anecdotally we heard from energy start-up companies that the ability to utilise an open-source standards-based application programming interface would enable delivery of a more comprehensive user experience and service for consumers.[38] This aligns with conversations the AEMC note in the consultation paper with Climate Salad.[39]

To best enable competition and innovative services for consumers (and which will enable system benefits and support small business), a customer's power data should not sit behind a proprietary 'wall' nor require third parties to make additional investments to be able to access and adequately read the data to provide a service / benefit to the consumer or initiate that service.

Q.10 Do existing arrangements sufficiently protect consumer privacy and maintain cyber security for any real-time data framework?

A detailed analysis of the current privacy protections is required.

In the first instance, ECA proposed that customer power data (or 'real-time data) should be defined as personal information, ensuring a level of protection under the Privacy Act 1988 (Cth).

Further work focused on cyber security and protecting consumer privacy is required. The Newgate metering research found access to personal data and how data would be used was the second highest concern with smart meters (after cost).[40] This concern resonates with the much broader research conducted by Consumer Policy Research Centre, which that found 94% of participants surveyed were uncomfortable with how their data are used. [41]

The roadmap for CER Cyber Security will be working through relevant and robust protections or standards that could be relevant in this context. In assessing any current or potential privacy protections, we recommend the AEMC consider the breadth of their reach, ensuring that all relevant parties are or can be captured.

Q.11 – What other changes would be required to enable a real-time data framework?

We do not have any additional comments at this stage.

[37] ECA Rule Change Proposal 2024 https://www.aemc.gov.au/rule-changes/real-time-data-consumers p12
[38] As one example, we spoke with one of the founders of www.topproperty.eco whose mission states 'to provide a service that supports homeowners on their journey to create energy and water-efficient sustainable homes, that are cheaper to run and more comfortable to live in.
[39] AEMC Consultation paper – Real-time data 2024 https://www.aemc.gov.au/rule-changes/real-time-data-consumers P26
[40] Newgate Research -AEMC Metering Review Full Report 2021 https://www.aemc.gov.au/sites/default/files/documents/newgate_research_full_research_report_-_metering_review.pdf p62
[41] Consumer Policy Research Centre 'Data and Technology Consumer Survey' 2020 CPRC 2020 Data and Technology Consumer Survey - CPRC

Q.12 – Do you agree with the proposed assessment criteria?

The criteria outlined seem reasonable. We do, however, have three recommendations:

a) The AEMC should assess how enabling consumers with access to their real-time data supports the building of social licence and trust. This aligns with earlier discussions on social licence being critical to the success of the acceleration of smart meters and the success of the energy transition.
b) The AEMC as part of the cost-benefit analysis should undertake an independent assessment of costs. We believe this will ensure a more robust and transparent consultation process.
c) The AEMC assess business-as-usual scenarios applied under each criterion and with a future lens.

Final remarks

"*The collection of metering data once per day (the "day after" data used in the NEM) is an outdated model developed at the time of dial-up modems and has been rendered obsolete by technological developments since that time*." [42]

This quote was taken from a report released in 2021. The AEMC has been consulting on metering advancement since at least 2020 – in a rapid transition this demonstrates action can take considerable time. If the opportunity to provide consumers access to their real-time data is effectively shelved, to be considered again at a later date the industry could be heading into a possible 'Kodak moment,'[43] which consumers and the transition cannot afford. We therefore ask the AEMC to not lose sight of this bigger picture and ensure consumers have the necessary tools for an equitable, consumer-focused net zero energy system.

[42] AGL NSW Demand Response – Final ARENA Knowledge Sharing Report 2021 https://arena.gov.au/assets/2021/06/agl-nsw-demand-response-final-report.pdf
[43] AEMC Chair Anna Collyer, Keynote Speech – Energy Week 2024 Keynote: Supporting consumers' journey to net zero: no hero walks alone | AEMC

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