



30th May 2024

Julia Cassuben
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Submitted electronically via aemc.gov.au.

Clean Energy Council's Response to Accelerating Smart Meter Deployment, Draft Determination (ERC0378)

Dear Julia Cassuben,

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) Draft Determination: *Accelerating smart meter deployment*.

The CEC is the peak body for the clean energy industry in Australia. We represent and work with Australia's leading renewable energy and energy storage businesses, as well as a range of stakeholders in the National Electricity Market (NEM), to further the development of clean energy in Australia. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

Smart meters are essential for effective integration of consumer energy resources (CER) in Australian households and small businesses, providing increased visibility and control for consumers over their electricity consumption and energy bills. The CEC is supportive of the core and supporting reforms proposed in the draft determination, aimed at maximising consumer benefits and increasing data visibility for distribution businesses.

The intended fast-track rule change ensures the proposed 2030 universal smart meter deployment target is achievable and the CEC believes this change will provide increased benefits to both consumers and industry. The improved access for distribution businesses to basic power quality data will result in the better management of networks with increased hosting capacity and visibility of highly constrained regions.

We commend the provision that consumers will have their data available upon request. Yet, the most significant benefits of smart meters are realised for customers when access to real-time data is granted. As outlined in the AEMC's Review of the Regulatory Framework for Metering Services, the CEC looks forward to the upcoming rule change request to improve

meter data availability for consumers, including the availability of real-time data to both customers and their appointed agents. This provision will ensure that both supporting reforms 'new customer safeguards' and 'improving the customer experience' are well-represented within the final rule change. Customer access to real-time data will build social license for the acceleration program and ensure customers can realise the full suite of benefits of smart meters, as outlined in the reform design. This will significantly improve outcomes for customers seeking to maximise their CER assets through an authorised agent.

The CEC recommends that aggregators should have similar access to data as distribution businesses, to best service their customers. This should come without cost and be easily accessible. The AEMC should consider the inclusion of obligations regarding data sharing and availability within the framework for metering services, establishing clear responsibilities while protecting consumer privacy.

We commend the inclusion of customer safeguards to protect consumers from upfront charges or exit fees when undergoing metering installation. However, there remain unexpected costs when undergoing metering replacements. Customers, particularly within vulnerable households or those facing hardships, should receive clear information regarding site remediation costs and avenues for financial assistance.

The proposed customer safeguards should be well-communicated throughout the smart meter roll-out, alongside the expected benefits from smart meter upgrades. It is expected that consumers will seek information from trusted sources, such as electricians, community groups or financial advisors and these parties should be engaged during the communication of the program. This is expected to build social license and trust from consumers, reducing barriers to 100 per cent smart meter uptake by 2030.

The Clean Energy Council will continue to work collaboratively with the AEMC towards the effective communication of small meter deployment for customers and commend the work done to date. We are interested in ongoing consultation with the AEMC regarding the upcoming rule change request and view this an important step in securing the best outcomes for a modern, connected and efficient energy system.

If you have any queries or would like to discuss the submission in more detail, please contact Con Hristodoulidis at christodoulidis@cleanenergycouncil.org.au.

Kind regards,



Con Hristodoulidis
Director of Distributed Energy
Clean Energy Council