

8 May 2025

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Essential Services Commission
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Dear Nathan

AusNet welcomes the opportunity to provide feedback to the Essential Services Commission (**the commission**) review *Revoking the Electricity Customer Transfer Code of Practice and the Electricity Customer Metering Code of Practice (the Metering Code)*. We fully support this initiative and believe it aligns with the evolving regulatory landscape and the needs of the energy market.

We acknowledge the commission's efforts in this review to streamline regulatory frameworks and reduce duplication. We agree with the commission's view the current codes are outdated and that the obligations relating to electricity customer transfers and metering are provided by other obligations and can be misaligned with the procedures administered by the Australian Energy Market Operator (**AEMO**).

Key issues on which the commission seeks feedback

The commission specifically asked for comments the impact of revoking:

- the National Meter Identifier Standing Data Schedule for Victoria;
- obligations regarding embedded networks in the Metering Code; and
- physical access to metering equipment to access data stored in it.

The commission also welcomed general feedback on its proposal to revoke the *Electricity Customer Transfer Code of Practice* and the *Metering Code*.

Feedback on revoking the Codes

AusNet supports the revocation of these three provisions. In revoking these provisions, the commission will eliminate unnecessary duplication, simplify compliance requirements and reduce administrative burden.

We suggest the commission also consider revoking clause 2.6 of the Metering Code without replicating those obligations in other Codes of Practice. This clause provides for customers to access written metering data from the responsible person when a meter is installed and upon request. Revocation is appropriate for three key reasons:

- The access to metering data requirement is already duplicated in the National Electricity Rules¹ and through the Consumer Data Right (as applicable to energy requirements). It is not entirely clear whether the purpose of the provision of the data through a distributor (as provided for in the Metering Code) is still needed or is suitable for delivering the current and future data needs of customers.

Since the establishment of clause 2.6 of the Metering Code, the regulatory framework for customer data access has evolved with the 2021 Consumer Data Right application to energy and the earlier 2014 customer access to information about their energy consumption Rule change. These reforms provided a means for customers to access and effectively use their energy data as well as provide this data to third parties (should they wish to). Importantly, the Consumer Data Right (energy) reflects modern consumer protections around

¹ See NER, Clause 7.10.3 - Provision of metering data to certain persons

data privacy, security and useability. This also reflects the significant investment by retailers and government to design and build this infrastructure. A requirement to duplicate this investment would be potentially very costly without necessarily providing any additional customer benefits.

- Currently, AEMC is undertaking a review to allow customer access to real time meter data in its directions paper, real-time data for consumers. AEMC's review is looking at how customers can access real time data directly from their smart meters over time and is seeking to propose obligations to provide real time data from meters. AEMO notes customers and third-party providers are currently installing separate digital meter readers on or around the meter to meet this need. In the future, the rule change proposes to allow for easier access to real time data.
- Finally, it is unclear what additional benefits to customers are provided for by retaining clause 2.6 of the Metering Code. Customer needs are already provided for under the remaining arrangements including understanding previous consumption patterns (for example to better respond to time-of-use pricing) or finding an energy deal that better suits that customer's needs. In addition, other requirements such as distributors needing to provide access to meter data via their portal in support of energy comparison sites are now superseded.²

If you have any enquiries, please do not hesitate to contact me.

Sincerely,



Justin Betlehem
Manager, Metering strategy and regulation
AusNet Electricity Services

² The Victorian Energy Compare portal allows customers to determine the least costly market offers available to them or analyse potential savings from installing solar generation based on their interval meter data provided by AEMO