

Real-Time Data for Consumers



Draft High Level Implementation Assessment (HLIA) Industry Briefing

17 October 2025

Please note that this session will be recording for minute-taking purposes only



1. Welcome



We acknowledge the Traditional Custodians of the land, seas and waters across Australia. We honour the wisdom of Aboriginal and Torres Strait Islander Elders past and present and embrace future generations.

We acknowledge that, wherever we work, we do so on Aboriginal and Torres Strait Islander lands. We pay respect to the world's oldest continuing culture and First Nations peoples' deep and continuing connection to Country, and hope that our work can benefit both people and Country.

'Journey of unity: AEMO's Reconciliation Path' by Lani Balzan

AEMO Group is proud to have launched its first Reconciliation Action Plan in May 2024. 'Journey of unity: AEMO's Reconciliation Path' was created by Wiradjuri artist Lani Balzan to visually narrate our ongoing journey towards reconciliation – a collaborative endeavour that honours First Nations cultures, fosters mutual understanding, and paves the way for a brighter, more inclusive future.

Read our
RAP



General Housekeeping

1. Please mute your microphone when you are not contributing directly to the call.
2. Use the 'Raise hand' Teams functionality should you wish to contribute directly to the call.
3. Use the 'Chat' Teams functionality for any other questions or comments you may have.
4. In attending this meeting, you are expected to:
 - Be familiar with relevant content, including:
 - Applicable Laws and Rules, the AEMC's Draft [Determination and Rule](#)
 - Contribute constructively
 - Be respectful, both on the call and in the chat

AEMO Competition Law Meeting Protocol

- AEMO is committed to complying with all applicable laws, including the Competition and Consumer Act 2010 (CCA). In any dealings with AEMO, all participants agree to adhere to the CCA at all times and to comply with appropriate protocols where required to do so.
- AEMO has developed meeting protocols to support compliance with the CCA in working groups and other forums with energy stakeholders
- The AEMO Competition Law Meeting Protocol can be viewed and downloaded from AEMO's website
 - https://aemo.com.au/-/media/files/stakeholder_consultation/working_groups/aemo-competition-law-meeting-protocol/aemo-competition-law-meeting-protocol---october-2022.pdf?la=en

Agenda

Topic #	Topic	Presenter
1	Welcome and introduction	Jen Marin (AEMO)
2	Purpose	Jen Marin (AEMO)
3	AEMC Real-Time Data for Consumers Draft Determination	Justin Stute (AEMO)
4	Draft Real-Time Data for Consumers HLIA <ul style="list-style-type: none">• Summary of key items• Potential AEMO and IEC Procedure impacts• Potential market system impacts• Indicative milestones	Justin Stute (AEMO) Louise Webb (AEMO) and Sean Jennings (IEC) Simon Tu (AEMO) Anna Boin (AEMO)
5	Next steps, General questions & Close	Jen Marin (AEMO)

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2. Purpose

Disclaimer

This document includes material outlining AEMO's and the IEC's (Information Exchange Committee) interpretation of indicative impacts of National Electricity Market (NEM) reforms to energy market systems and processes for energy industry participants, as of October 2025.

The interpretations expressed in this presentation are not binding on AEMO or the IEC. The interpretation of the impact of this reform may change at any time.

Anyone participating or intending to participate in the NEM should obtain detailed advice about the application of the National Electricity Rules (NER) and applicable laws, procedures and policies to their specific circumstances.

To the maximum extent permitted by law, AEMO, the IEC and its employees or consultants are not liable for any statements in, or omissions from, these materials, or for any use of or reliance on them

Purpose of this session

What is the purpose of the high-level implementation assessment (HLIA)?

The purpose of the HLIA is to provide a preliminary view to stakeholders on how Real-Time Data for Consumers may be implemented. This is intended to inform participants as they develop their own implementation timelines and impact assessments.

The HLIA document provides an indicative and preliminary overview of:

- Likely impacted Retail Electricity Market Procedures (AEMO and IEC).
- High level system and data exchange impacts.
- Indicative timelines showing consultation period/s, AEMO development and testing timeframes, industry development, testing, market trial and go-live timings.
- Procedural and system implementation challenges with the proposed timeframe of the effective date of the Draft Rule.

The document does not pre-empt the outcomes of the ongoing Rule Change process.

Key Dates

HLIA Process	Indicative Dates
AEMC Draft Rule Determination	11 September 2025
Draft HLIA v0.1	16 October 2025
Draft HLIA Webinar	17 October 2025 (TODAY)
AEMC Draft Rule Determination submissions close	23 October 2025
Stakeholder feedback to the Draft HLIA due	31 October 2025
AEMC Final Rule and Determination	4 December 2025
Final HLIA	Early 2026

[AEMC Real-time data for consumers – Rule Change](#)

3. AEMC Real-Time Data for Consumers Draft Determination

Introduction

On 11 September 2025, the Australian Energy Market Commission (AEMC) published a draft determination proposing a framework to enable access to real-time data from smart meters.

The AEMC's draft determination is to:

- enable all consumers to request access to real-time data from smart meters from 1 January 2028
- enable representatives appointed by customers and accredited by the Australian Energy Market Operator (AEMO) to also access the data, subject to the relevant customer's consent
- change the meter minimum service specifications so that all new meters installed from 1 January 2028 would be capable of communicating real-time data
- introduce an enabling framework to define the service and associated roles and responsibilities including:
 - a definition of real-time data in the National Electricity Rules (NER)
 - AEMO-specified real-time data procedures
 - a requirement on retailers to facilitate access to real-time data
 - a requirement on metering coordinators (MCs) to facilitate access to real-time data in accordance with a retailer's request and any requirements specified in AEMO's real-time data procedures.

4. Draft Real-Time Data HLIA

Summary of Key Items

Summary of Key Items

Topic	Requirement	Considerations/complexities
Real-time data procedures	<ul style="list-style-type: none"> AEMO must develop and publish initial “Real-time Data Procedures” in accordance with the Rule consultation procedures, by 1 July 2026 (NER 7.4.5(a)). These will define formats, service levels, security and encryption standards, roles, and responsibilities (MCs, MPs, retailers, accredited recipients), error handling, consent flows, audit trails, fallback modes, and monitoring. Participants must align systems and processes to these specifications. 	<ul style="list-style-type: none"> Complex requirements will require time for consultation preparation. The 1 July 2026 timeframe (assuming a Final Rule in December 2025) will not allow for sufficient procedure development and stakeholder consultation. AEMO proposes an adjusted schedule for the publication of these procedures and related necessary changes to other AEMO procedures that are required to support the Rule, to mitigate these challenges.
Accreditation guidelines	<ul style="list-style-type: none"> AEMO must publish accreditation guidelines by 1 November 2026 for “real-time data authorised recipients” (i.e. representatives appointed by customers to access real-time data, subject to consent). These will need to include criteria, application processes, compliance obligations, revocation, monitoring and enforcement. Systems will be required for accreditation tracking, role-based access management, and reporting. 	<ul style="list-style-type: none"> Timeframe for delivery of the guidelines should be reflective of the capacity to develop and publish the Real-time Data Procedures, described above. AEMO considers development of these procedures to be the highest priority deliverable and proposes an adjusted schedule with formal consultation commencing following the publication of those procedures.
Real-Time Data Authorised Recipient (RTDAR)	<p>Defined in NERR 59D, accredited under NER 7.4.5. The role is currently scoped narrowly to real-time data access only.</p>	<p>No reference to the role being able to interact physically with the metering installation other than access to a “port” external to the metrology seals.</p>
Retailer / MC facilitation	<p>Retailers and MCs must facilitate customer access to real-time data (NERR 59E-59F; NER 7.16). The minimum services specification in NER S7.5 requires that metering installations installed following the Rule commencement date (1 January 2028) must support real-time data</p>	<ul style="list-style-type: none"> There are no exemptions or grandfathering arrangements for inventory / stock-on-hand in the Draft Rule or provided for within the scope of AEMO procedures. MC’s must facilitate responses to ombudsman queries (7.3.2(o), (p) and (q); in general and not only as those queries might relate to Real-time Data.

Key Considerations

Topics	Considerations/complexities/working assumptions
AEMC Draft Determination Dates	<ul style="list-style-type: none"> AEMO proposes an adjusted schedule for the publication of Procedures, Guidelines and associated market system changes, which it considers necessary to achieve the objectives of the Draft Rule. AEMO propose delivery of this reform in a series of packages: <ul style="list-style-type: none"> AEMO Package 1: <ul style="list-style-type: none"> AEMO Real-Time Data Procedure and associated RTD (real-time data) updates to existing AEMO Procedures MSATS system changes (timing aligned with scheduled AEMO system release) AEMO Package 2: <ul style="list-style-type: none"> AEMO RTDAR Accreditation Guideline
IEC B2B Procedure consideration	<ul style="list-style-type: none"> The IEC also consider that a revised delivery schedule is necessary to accommodate consideration of B2B procedures. <ul style="list-style-type: none"> B2B Communications: <ul style="list-style-type: none"> B2B Procedures and eHub system changes
NERR and NER	<ul style="list-style-type: none"> AEMO notes that this reform spans the NER and NERR, and cross referencing is necessary to understand the requirements of the Draft Rule.
Ombudsman Enquiries	<ul style="list-style-type: none"> AEMO notes that this reform includes handling of Ombudsman enquiries, not solely related to RTD, which will be reflected within AEMO Procedures.
Existing meters and Exemptions	<ul style="list-style-type: none"> AEMO notes that this reform has no “grandfathering” arrangements for existing stock on hand, refurbished stock removed from a connection point, nor stock on order. There are no provisions for AEMO to exempt any party from providing RTD, nor any other provision in the Draft Rule.

Key Considerations

Topics	Considerations/complexities/working assumptions
<p>MSATS and visibility of Real Time Data <i>metering installation</i> capabilities</p>	<ul style="list-style-type: none"> AEMO expects that MSATS will identify the following at a NMI level for the metering installation: <ul style="list-style-type: none"> A metering installation is real time capable (wireless and hard wired) – to inform the FRMP of Real time capability A metering installation is currently enabled (configured and RTD) – to inform a new MC of ongoing RTD provision AEMO expects that the MC will maintain a register of connected real time access parties in the provision of RTD for a given metering installation without reference to MSATS or other market systems. AEMO expects that an MP will understand capability of individual devices without reference to MSATS or other market systems.
<p>New Real Time Authorised Recipients (RTDARs)</p>	<ul style="list-style-type: none"> AEMO considers that a new list of RTDARs will be required, reflecting those lists that currently exist for roles subject to AEMO accreditation (e.g. MDPs, ENMs) No provisions have been made to enable RTDARs to have access to data beyond RTD – i.e. RTDARs will not have access to Power Quality Data, NMI Standing data and Metering data. Therefore, as the RTDAR role is a recipient of RTD local to the premises only, AEMO does not propose to create a new role in MSATS for the one or more RTDARs that could be active at a connection point, or for MSATS to be the system which confirms RTDAR status at a NMI (e.g. active or inactive). RTD access, including monitoring of number of parties accessing Real time data for a given NMI, is to be managed by the MC in their systems and via B2B communications with relevant participants.
<p>Meter Types required to be capable of, and needing to facilitate access to RTD.</p>	<ul style="list-style-type: none"> As the MC obligation to facilitate access to RTD applies only in respect of a <i>small customer metering installation</i>, clarity is required to determine whether 4A metering installations must enable RTD access (as 4A metering installations are not small customer metering installations). Note that the Draft Rule is clear that 4A metering installations must be capable of providing RTD, but that is separate to a requirement to provide for enabling RTD. As new type 8 and 9 metering installations are not <i>small customer metering installations</i>, they are not within scope of this HLIA

Potential AEMO and IEC Procedure Impacts

Potential IEC (B2B) procedure impacts

B2B Procedure	Key considerations/questions
Service Order Process	<ul style="list-style-type: none"> • Amendments to service orders to support: <ul style="list-style-type: none"> • RTD capable metering being installed or reconfigured, possibly serviced through an amendment to Install/exchange Meter (for a whole new RT-capable meter) • Faults and investigations for failure of RTD delivery. • The ability to enable, disable, reset and administer access to RTD for type 4 and 4A meters, potentially through a new or amended Service Order SubType. • Matters for further consideration by the IEC <ul style="list-style-type: none"> • How do authorised recipients request retailers enable access to real time data services? • Given the AEMC proposed that Consumer Data Right protocols will not be used, how will proof of consent be provided between participants? <ul style="list-style-type: none"> • How do customers or accredited agents enquire about the failure of a key or data accessibility
Own Way Notification Process	<ul style="list-style-type: none"> • Matters for further consideration by the IEC <ul style="list-style-type: none"> • Is there a need for a transaction for conveying the security key between B2B participants?
General	<ul style="list-style-type: none"> • Matters for further consideration by the IEC <ul style="list-style-type: none"> • Ombudsman enquiries: <ul style="list-style-type: none"> • The Draft NER 7.3.2(o) through (q) requires MCs to support Retailers, and MDPs and MPs to support MCs in the resolution of enquiries. • The IEC is yet to determine whether B2B Procedure changes are necessary to facilitate this requirement.

Potential AEMO (B2M) procedure impacts

(New Artefacts)

Artefact Name	Key considerations
Real-Time Data Procedure (New)	<ul style="list-style-type: none"> • AEMO must develop and publish initial “Real-time Data Procedures” in accordance with the Rule consultation procedures, by 1 July 2026 (NER 7.4.5(a)). • These will define formats, service levels, security and encryption standards, roles, and responsibilities (MCs, MPs, retailers, accredited recipients), error handling, consent flows, audit trails, fallback modes, and monitoring. • Participants must align systems and processes to these specifications.
Real-Time Data Authorized Recipient Accreditation Guidelines (New)	<ul style="list-style-type: none"> • AEMO must publish accreditation guidelines by 1 November 2026 for RTDARs i.e. real-time data authorised recipients appointed by customers to access RTD, subject to consent. • These will need to include criteria, application processes, compliance obligations, revocation, monitoring and enforcement. Systems will be required for accreditation tracking, role-based access management, and reporting.
Accredited Real Time Data authorised recipients (New)	<ul style="list-style-type: none"> • Similar to lists of accredited MDPs, MPBs and ENMs published on AEMO website, AEMO to create a list of Accredited RTDARs

Potential **AEMO (B2M)** procedure impacts

(Accreditation and Registration)

Artefact Name	Key considerations
Guide to the Role of Metering Coordinator	<ul style="list-style-type: none"> • Insert reference to new Real-Time Data Procedure • Insert reference to MC obligations to assist Retailers to resolve RTD energy ombudsman queries - NER 7.3.2(p) • Insert reference to MC obligations to provide access to RTD to small customers and Real-Time data authorised recipients – NER 7.3.2(r) and 7.15.7
Qualification Procedure (MP, MDP and ENM)	<ul style="list-style-type: none"> • Create new section related to accreditation of Real-Time Data authorised recipients (RTDARs) • Rename document to Qualification Procedure (MP, MDP, ENM and RTDAR)
Accreditation Checklist (MP, MDP and ENM)	<ul style="list-style-type: none"> • Create new section related to accreditation of Real-Time Data authorised recipients (RTDARs) • Rename document to Accreditation Checklist (MP, MDP, ENM and RTDAR)
Application Form (MP, MDP and ENM)	<ul style="list-style-type: none"> • Create new section related to accreditation of Real-Time Data authorised recipients (RTDARs) • Rename document to Application Form (MP, MDP, ENM and RTDAR)
Audit Metering Coordinator Auditing Questions Template	<ul style="list-style-type: none"> • Inclusion of MC obligations referenced in New Real-Time Data Procedure • Inclusion of MC obligations relating to access to and security controls for Real-Time data • Inclusion of MC obligations referring to resolution of Real-Time energy ombudsman enquiries
Default and Deregistration Procedure	<ul style="list-style-type: none"> • Update to include provisions related to RTDAR

Potential AEMO (B2M) procedure impacts

(Metering Procedures, guidelines and processes)

Artefact Name	Key considerations
Service Level Procedure - Metering Provider	<ul style="list-style-type: none">• Insert reference to MPB assisting MC with Real-Time energy ombudsman queries - NER 7.3.2(q)• Insert reference to New Real-Time Data Procedure
Service Level Procedure - Metering Data Provider	<ul style="list-style-type: none">• Insert reference to MDP assisting MC with Real-Time energy ombudsman queries - NER 7.3.2(q)• Insert reference to new Real-Time Data Procedure

Potential AEMO (B2M) procedure impacts

(MSATS & Supporting documents)

Artefact Name	Key considerations
MSATS Procedures - Principles and Obligations for all Connection Points	<ul style="list-style-type: none"> • Insert reference to new Real-Time Data Procedure • Insert MSATS identification <i>metering installation</i> is Real-Time capable at a NMI Level • Insert MSATS identification <i>metering installation</i> is currently Real-Time enabled at a NMI Level
Retail Electricity Market Glossary & Framework	<ul style="list-style-type: none"> • Insert reference to new Real-Time Data Procedure • Insert reference to Real-Time Data Authorised Recipient Accreditation (RTDAR) Guideline • Modify Accreditation Checklist (MP, MDP and ENM) to reference RTDAR • Modify Qualification Procedure (MP, MDP, ENM) to include reference to RTDAR • Modify Application Form (MP, MDP, ENM) to include reference to RTDAR • Modify Default and Deregistration Procedure to include reference to RTDAR • Insert reference to new list of Accredited Real-Time Data authorised recipients • Creation of RTD terms
Standing Data for MSATS	<ul style="list-style-type: none"> • Insert reference to new Real-Time Data Procedure • Insert MSATS identification metering installation is RTD capable at a NMI Level • Insert MSATS identification metering installation is currently RTD enabled at a NMI Level

Potential **AEMO (B2M)** procedure impacts

(General)

Artefact Name	Key considerations
All AEMO artefacts	<ul style="list-style-type: none">• Modify Section 1.3 across all AEMO artefacts impacted by Real-time Data Reform including document name changes. e.g. Application Form (MP, MDP, ENM and RTDAR)

Potential Market System and Schema Impacts

Potential Market System impacts

AEMO System	Summary
MSATS CATS	<p>Introduce new attributes within the CATS_NMI_DATA table to:</p> <ul style="list-style-type: none"> Record whether the metering installation is RTD-capable Record whether the metering installation currently has RTD enabled <p>MPs to maintain NMI standing data indicating RTD capability and enablement via the Blind Update Tool (BUT) and/or MSATS CRs</p> <ul style="list-style-type: none"> BUT Enhancements: <ul style="list-style-type: none"> Support for MP maintenance of new RTD attributes Support for initial population of RTD attributes by MCs from the rule effective date Change Request Process Updates: <ul style="list-style-type: none"> Introduction of new 5XX0 and 5XX1 CR types for MP-initiated updates Continued use of existing 5100 and 5101 CRs for AEMO-initiated updates <p>RTD attribute values to be made available to entitled participant roles via:</p> <ul style="list-style-type: none"> MSATS NMI Discovery MSATS Reports: C1, C4, C7 MSATS Snapshot Report MSATS Browser <p>MSATS to support the following schema versions :</p> <ul style="list-style-type: none"> LATEST/CURRENT: B2M aseXML_r4(n) and CATS(n), NMID(n) IDX schema SUPERSEDED: B2M aseXML_r4(n-1) and CATS(n-1), NMID(n-1) IDX schema

Potential Market System impacts

AEMO System	Summary
B2B Integrations	<p>Potential changes to B2B Service Orders (SORD) transactions and SORD SubType(s) to:</p> <ul style="list-style-type: none"> • Request the installation and reconfiguration of RTD capable meters • Enable, disable, reset and administer access to RTD • Manage RTD related delivery faults and investigations. • Manage or reset meter security credentials (e.g. secure passkey) • Share customer consent information • Facilitate the communication and resolution of Ombudsman enquiries <p>Possible changes to B2B One Way Notification (OWN) transactions to:</p> <ul style="list-style-type: none"> • Communicate security keys <p>The SMP eHub to support the following schema versions and interoperability:</p> <ul style="list-style-type: none"> • LATEST: aseXML_r4(n) and SORD(n), OWN(n) IDX schema versions • SUPERSEDED: aseXML_r4(n-1) and SORD(n-1), OWN(n-1) IDX schema versions • Support for schema interoperability between (n) and (n-1) versions
AEMO Provided Software	<ul style="list-style-type: none"> • Participant Batchter – New aseXML schema for B2M • B2B Validation Module – New aseXML schema for B2B • AEMO Gateway Software – Where IDX transition aligns with the RTD rule effective date, new transforms may be supported between aseXML to IDX schemas for B2B and B2M

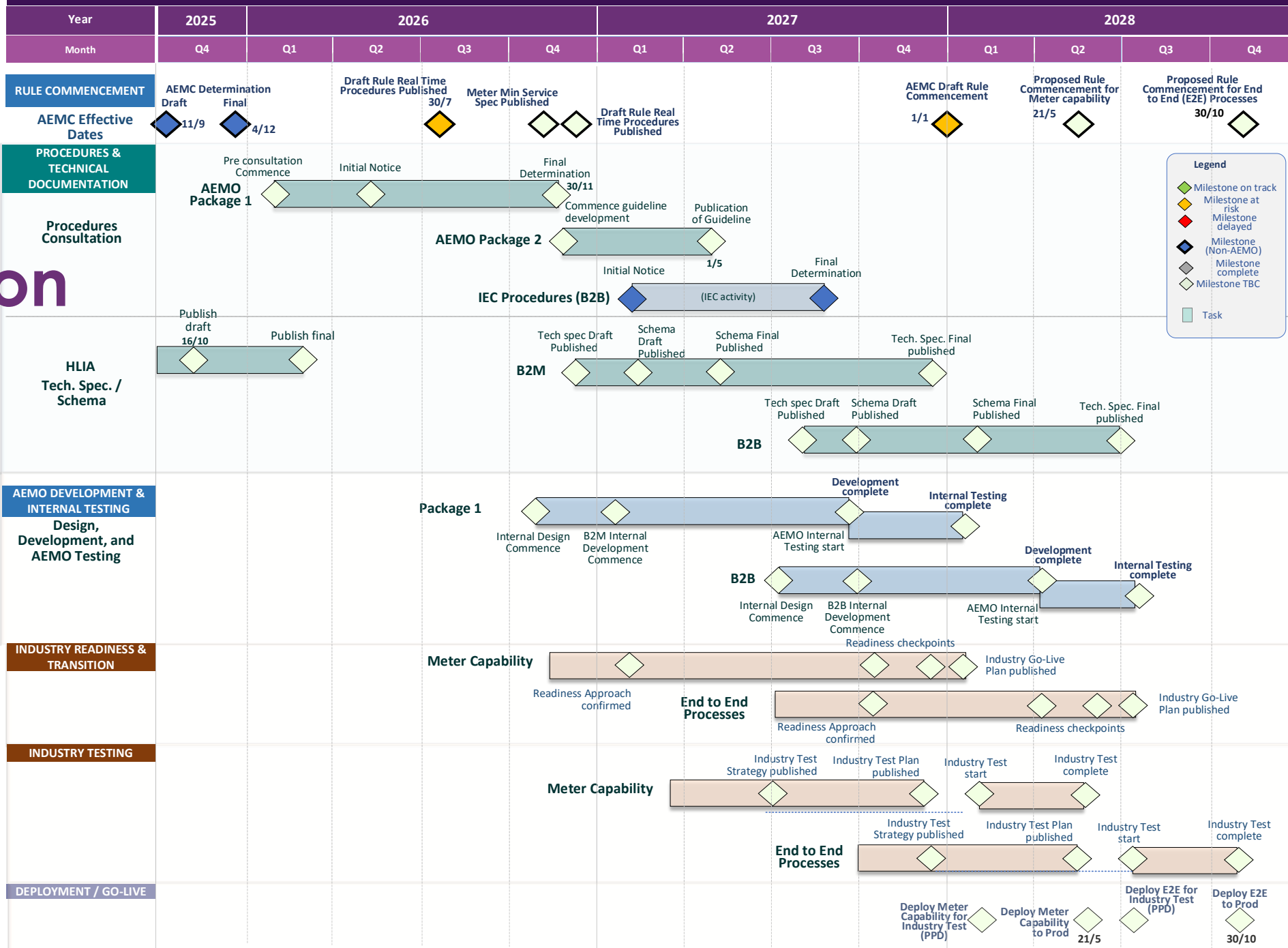
Potential Market System impacts

AEMO System	Summary
IDX interface	<ul style="list-style-type: none"> • AEMO assumes RTDAR parties will not require an IDX provisioned data exchange framework to interact with Registered Participants • During the implementation of this initiative, the MITE Project may deploy new interfaces to facilitate exchange of NEM Retail B2B and B2M business functions through the IDX Platform • AEMO will provide new protocols, patterns, schemas, channels, Gateway software, and IDX Web Application to support this exchange, alongside existing “as-is” methods during the IDX sunset period
Capacity	<ul style="list-style-type: none"> • Capacity uplifts may be required to manage additional volumes of data flow, and the details will be covered when the detailed requirements and volumetrics are available

Potential Schema Impacts

AEMO System	Summary
B2M	<ul style="list-style-type: none"> • aseXML - Changes to add new RTD schema elements against NMI master data for aseXML_r(n). • IDX Schema - Changes to add new RTD schema elements against NMI master data for CATS(n), NMID(n) IDX schemas.
B2B	<ul style="list-style-type: none"> • aseXML - Changes to aseXML_r(n) to reflect RTD-related B2B integration updates. • IDX Schema - Changes to SORD(n) and OWN(n) IDX schemas to reflect required B2B integration changes.

Indicative Milestones



Legend

- Milestone on track
- Milestone at risk
- Milestone delayed
- Milestone (Non-AEMO)
- Milestone complete
- Milestone TBC
- Task

Indicative Implementation milestones

5. Next Steps & Close



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Next Steps & Close

AEMC Draft Determination Submissions Close 23rd October 2025

- AEMC Final Determination and Rules to be published by 4 December 2025

AEMO is seeking feedback on its draft HLIA

- Following this session, please provide your feedback on the HLIA using the provided template.
- Feedback on the draft HLIA is to be sent to NEMReform@aemo.com.au by 31 October 2025



For more information visit

aemo.com.au