

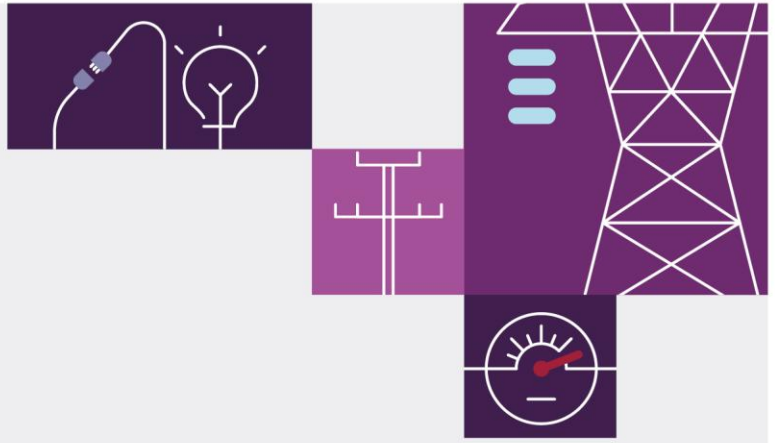
Real-time Data for Consumers

October 2025

High Level Implementation
Assessment (HLIA)

Preliminary view





AEMO acknowledges the Traditional Owners of country throughout Australia and recognises their continuing connection to land, waters and culture. We pay respect to Elders past and present.

Important notice

Purpose

AEMO and the Information Exchange Committee (IEC) have prepared this document to provide preliminary information about the implementation approach for supporting the Real-time data for consumers Draft Rule and determination.

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Version control

Version	Release date	Changes
0.1	October 2025	Initial Draft

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Definitions

Definition	Description
BUT	Blind Update Tool
IDAM	Identity and Access Management
IDX	Industry Data Exchange
MITE	Market Interface Technology Enhancements
RTD	<i>real-time data</i> . Measurements of voltage (in volts), current (in amperes) and phase angle made available by one or more measurement elements in a type 4 or type 4A metering installation at a resolution of no less than once per second in accordance with the requirements of the <i>real-time data procedures</i> .
RTDAR	<i>real-time data authorised recipient</i> . A person accredited by AEMO under clause 7.4.5 of the NER

1 Introduction

1.1 Real-time data for consumers – Rule Change

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

The AEMC consider that all consumers should have access to RTD as part of their electricity service. They have proposed a draft rule that would see the fleet of meters progressively upgraded to enable access to RTD at no charge.

The AEMC's draft determination is to:

- enable all consumers to request access to RTD 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 (min specs) so that all new meters installed from 1 January 2028 would be capable of communicating RTD
- introduce an enabling framework to define the service and associated roles and responsibilities including:
 - a definition of RTD in the National Electricity Rules (NER)
 - AEMO-specified Real-Time Data Procedures
 - a requirement on retailers to facilitate access to RTD
 - a requirement on metering coordinators (MCs) to facilitate access to RTD in accordance with a retailer's request and any requirements specified in AEMO's Real-Time Data Procedures.

The draft rule does not apply to embedded networks or in Victoria.

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

1.2 Document background and purpose

The purpose of this document is to provide a preliminary view to participants on how the Rule change may be implemented by AEMO and the IEC. This is intended to assist and inform participants in developing their own implementation timelines and impact assessments.

This document provides an indicative and preliminary overview of:

- Likely impacted AEMO Procedures and B2B Procedures.
- High level system and data exchange impacts.
- Indicative timelines showing potential consultation periods, industry testing, market trial and go-live timings.

Please note: AEMO's and the IEC's HLIA assessment, based on AEMC Draft Determination, may vary subject to AEMC Final Rule and Pre Consultation.



1.3 HLIA Consultation process and key dates

Timetable for the Rule change and points of stakeholder consultation.

Stage	Timeline
AEMC Draft Rule Determination	11 September 2025
AEMO and the IEC publish HLIA v0.1	16 October 2025
AEMO draft HLIA Webinar	17 October 2025
AEMC Draft Rule Determination submissions close	23 October 2025
Participant feedback to AEMO and the IEC on the draft HLIA	31 October 2025
AEMC Final Rule and Determination	4 December 2025
AEMO publish final HLIA (incl. IEC approved B2B Procedure timelines)	Early 2026

2 Market Design Overview

2.1 Summary

The following section provides a market design overview of the reform which will impact AEMO's and the IEC's Procedures and systems.

2.1.1 Real-time data procedures

- 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.
- **Key challenges:**
 - o Complex requirements will require time for consultation preparation.
 - o The 1 July 2026 timeframe (assuming a Final Rule in December 2025) will not allow for sufficient procedure development and stakeholder consultation.
 - o 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.

2.1.2 RTDAR Accreditation guidelines

- 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.
- **Key challenges:**
 - o Timeframe for delivery of the guidelines should be reflective of the capacity to develop and publish the Real-time Data Procedures, described above.
 - o AEMO considers development of the procedures described in 2.1.2 to be the highest priority deliverable and proposes an adjusted schedule for the publication of this guideline within this HLIA, with formal consultation commencing following the publication of those procedures.

2.1.3 New accredited role – Real-Time Data Authorised Recipient

- Defined in NERR 59D, accredited under NER 7.4.5. The RTDAR role is currently scoped narrowly to RTD access only.
- 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.



2.1.4 Retailer / MC facilitation

- Retailers and MCs must facilitate customer access to RTD (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 RTD – noting that 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)); not only as those queries might relate to RTD, but in general.
- The IEC will need to consider whether changes are required to assist in facilitating these matters within the scope of the B2B Procedures.

3 Summary of key impacts

This section provides an assessment of the key impacts to AEMO’s systems and processes for this rule change.

Focus Area	Impact Description
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 packages: <ul style="list-style-type: none"> AEMO Package 1: <ul style="list-style-type: none"> AEMO Real-Time Data Procedure and associated RTD 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. B2B Communications: <ul style="list-style-type: none"> B2B Procedures and eHub system changes
Changes span the 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.
MSATS and visibility of Real Time Data <i>metering installation</i> capabilities	<ul style="list-style-type: none"> AEMO expects that MSATS will identify the following at a NMI level for the <i>metering installation</i>: <ul style="list-style-type: none"> A <i>metering installation</i> is real time capable (wireless and hard wired) – in order to inform the FRMP of Real time capability

Focus Area	Impact Description
	<ul style="list-style-type: none"> • A <i>metering installation</i> is currently enabled (configured and RTD) – in order 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 <i>metering installation</i> 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 Data Authorised Recipients</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 <i>small customer metering installations</i>). 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

4 AEMO and IEC Procedure Impacts Review

The following provides initial assessment of Procedures and Documents impacted.

This section is based on the AEMC’s Draft Rule and Determination and will be updated upon publication of a Final Rule.

4.1 AEMO Procedures (and other impacted AEMO artefacts)

Procedure Name	Potential Impact
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 Authorised Recipient Accreditation (RTDAR) 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
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
MSATS Procedures - Principles and	<ul style="list-style-type: none"> Insert reference to new Real-Time Data Procedure Insert MSATS identification <i>metering installation</i> is RTD capable at a NMI Level

Procedure Name	Potential Impact
Obligations for all Connection Points	<ul style="list-style-type: none"> Insert MSATS identification <i>metering installation</i> is currently RTD enabled at a NMI Level
Standing Data for MSATS	<ul style="list-style-type: none"> Insert reference to new Real-Time Data Procedure Insert MSATS identification <i>metering installation</i> is RTD capable at a NMI Level Insert MSATS identification <i>metering installation</i> is currently RTD enabled at a NMI Level
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
Service Level Procedure - Metering Provider	<ul style="list-style-type: none"> Insert reference to MPB assisting MC with RTD 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 RTD energy ombudsman queries - NER 7.3.2(q) Insert reference to new Real-Time Data Procedure
Qualification Procedure (MP, MDP and ENM)	<ul style="list-style-type: none"> Create new section related to accreditation of 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 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 RTDARs Rename document to Application Form (MP, MDP, ENM and RTDAR)
Audit Metering Coordinator Auditing Questions Template	<ul style="list-style-type: none"> Include MC obligations referenced in New Real-Time Data Procedure Include MC obligations relating to access to and security controls for RTD Include MC obligations referring to resolution of RTD energy ombudsman enquiries
Default and Deregistration Procedure	<ul style="list-style-type: none"> Update to include provisions related to RTDAR
Section 1.3 Related Document across all AEMO artefacts	<ul style="list-style-type: none"> Modify Section 1.3 across all AEMO artefacts impacted by RTD Reform including document name changes. e.g. Application Form (MP, MDP, ENM and RTDAR)



AEMO has not identified impacts to the following AEMO Procedures, Guidelines and related materials:

- Hints and Tips: CATS and NMI Discovery
- MSATS Procedures – MDM Procedure
- Service Level Procedure – Embedded Network Manager Service
- Metering Data Provision Procedures
- Exemption Procedure Metering Installation Malfunctions
- Metering Exemption Small Customer Metering Installation
- Metering Installation Exemption Guideline
- Exemption Procedure - Data Storage Requirements
- Metering installation data storage requirements Application for Exemption form
- Metering Data Delivery Calendar
- MDM File Format and Load Process
- MDFF Specification NEM12 NEM13
- Meter Data Validation Matrix
- NMI Standing Data Schedule
- MSATS National Metering Identifier Procedure
- National Metering Allocation List
- NEM RoLR Processes Part A and Part B
- List of Special and Technology Related Sites
- Cross Boundary Supply Guideline
- AEMO Cross Boundary Connection Point Check List
- SAPS Participant Fact Sheets
- AEMO SAPS Connection Point Check List
- Metrology Procedures Part A, Part B and Part C
- NEM Load Tables for Unmetered Loads
- Unmetered Load Guideline
- Guideline for Clarification of the National Measurement Act
- Guide to Embedded Networks
- Allocation of Embedded Network Codes
- Audit Guideline Metering Coordinator Auditing
- Alternate Testing and Inspection Guidelines for Metering Installations in the NEM

4.2 IEC Procedures

Review of the Draft Rule by the B2B Working Group has identified the following likely changes to the B2B Procedures:

Procedure Name	Potential Impact
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?
One 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.

5 AEMO System and Schema Impacts

5.1 AEMO Systems Impacts

AEMO System	Summary
<p>MSATS CATS</p>	<ul style="list-style-type: none"> • Introduce new attributes within the CATS_NMI_DATA table to: <ul style="list-style-type: none"> ○ Record whether the metering installation is RTD-capable ○ Record whether the metering installation currently has RTD enabled • MPs to maintain NMI standing data indicating RTD capability and enablement via the Blind Update Tool (BUT) and/or MSATS CRs <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 • CR 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 • RTD attribute values to be made available to entitled participant roles via: <ul style="list-style-type: none"> ○ MSATS NMI Discovery ○ MSATS Reports: C1, C4, C7 ○ MSATS Snapshot Report ○ MSATS Browser • MSATS to support the following schema versions¹: <ul style="list-style-type: none"> ○ LATEST/CURRENT: B2M aseXML_r4(n) and CATS(n), NMID(n) IDX schemas ○ SUPERSEDED: B2M aseXML_r4(n-1) and CATS(n-1), NMID(n-1) IDX schemas
<p>B2B Integrations</p>	<ul style="list-style-type: none"> • Potential changes to B2B Service Orders (SORD) transactions and SORD SubType(s) to: <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 • Possible changes to B2B One Way Notification (OWN) transactions to: <ul style="list-style-type: none"> ○ Communicate security keys • The SMP eHub to support the following schema versions and interoperability: <ul style="list-style-type: none"> ○ LATEST/CURRENT: aseXML_r4(n) and SORD(n), OWN(n) IDX schema versions

¹ This assumes the IDX transition business case proceed in 2026. If the IDX transition for NEM B2M and B2B aligns with the RTD rule effective date, RTD schema changes will be incorporated into the IDX schemas and existing aseXML; otherwise, they will be delivered via existing aseXML only.

AEMO System	Summary
	<ul style="list-style-type: none"> ○ 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 Batcher – 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
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

5.2 Schema Impacts

Schema	Impact
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.

6 Implementation Pathway

6.1 Implementation Approach

This section outlines AEMO’s proposed high-level implementation pathway, subject to AEMC’s Final Rule. It provides an indicative view of the sequencing and timing of key activities required to update market systems and procedures to support industry readiness.

It is noted that participants may have additional activities, dependencies, and internal programs that affect their own implementation planning. Those matters are outside the scope of this HLIA.

Following publication of the AEMC’s Final Determination, currently scheduled for December 2025, AEMO will review the indicative timings and implementation approach outlined in this document. In consultation with the IEC, AEMO will update and republish the HLIA to reflect the Final Rule.

6.2 Key Implementation Considerations

Based on AEMO’s review of the Draft Rule, the publication timelines proposed by the AEMC do not appear to provide sufficient allowance for appropriate pre-consultation, formal consultation, and the design of complex technical and procedural frameworks.

Drawing on experience from recent procedural developments, such as the Basic Power Quality Data Procedures, which appears to be of comparable complexity, AEMO considers that compressed timelines may result in:

- Inadequate procedural design.
- limited opportunity for stakeholder engagement, and
- Insufficient time for participant implementation and testing.

To address these risks, AEMO proposes a revised sequencing and timeframe that would enable a more effective, coordinated, and lower-risk implementation.

6.3 Proposed Implementation Pathway

AEMO Package 1 – Real-Time Data Procedures and B2M Development

- Target final publication date: 30 November 2026
- Scope: Real-Time Data Procedures, consequential changes to AEMO’s Retail Market Procedures (details outlined in this paper), and associated B2M system changes.
- Follow-up activity: System development and testing to support functional deployment in the May 2028 system release

AEMO Package 2 – Accreditation Guidelines

- Consultation commencement: Following publication of Package 1

- Target final publication date: 1 May 2027
- Scope: Accreditation framework and guidelines to support authorisation of third parties accessing RTD.

This sequencing provides adequate time for consultation and design, aligns with established system release cycles, and supports a coordinated industry transition.

IEC Procedures

- The IEC have indicated a preference to consult on potential B2B Procedure changes following the completion of AEMO's Package 1 procedure publication (noting that IEC timelines are not specified by the Draft Rule)
- Target final publication date: August 2027
- System alignment: Implementation to occur following AEMO's B2M development, targeting a November 2028 release.

6.4 Commencement Timing

The Draft Rule currently proposes commencement on **1 January 2028**. AEMO notes that this timing presents operational risks, as it falls within a period of industry change freezes and heightened system support and operational focus on summer system reliability.

While it is essential to ensure sufficient time for AEMO's procedure development and system changes, AEMO emphasises that these activities are not expected to be the primary constraint on the implementation timing. With appropriate alignment to procedure consultations and system release cycles, AEMO anticipates being able to meet the proposed procedural and system delivery milestones outlined in this section 6.

However, commencement of the broader framework will also depend on factors beyond AEMO's direct control, including participant readiness, development of third-party systems, and the establishment of accreditation and data-access arrangements. These dependencies will be important in considering a practical and low-risk commencement date.

To reduce implementation risk and to support a smooth market transition, AEMO recommends that:

- **Where commencement is dependent on system changes**, timing should align with AEMO's bi-annual system release schedule (May and November);
- **Where commencement is not system-dependent**, seasonal holidays and industry change freezes (e.g. including 1 January) should be avoided where practicable; and
- **A phased or staggered commencement** may be appropriate to reflect the readiness across different framework components and participant response times, for example:
 - o **Metering installation capability**, as defined within Package 1, could progress independently of accreditation and data-access enablement, with metering installations deployed having latent capability to provide RTD and identified as such in market systems, and
 - o **Full operational commencement** would depend on completion of the accreditation and data-access framework (Package 2) and could therefore occur at a later date, allowing participants sufficient lead time to complete integration, accreditation, and testing.

This approach ensures that commencement reflects whole-of-industry readiness – including the time required for participants to operationalise the NER and AEMO’s frameworks.

6.5 Key Implementation Considerations

Draft Rule Commencement Milestones

Milestone	Timeline
AEMO must publish the initial Real-Time Data Procedures in accordance with the Rules consultation procedures.	No later than 1 July 2026
AEMO must publish the Accreditation guidelines required under new clause 7.4.5(b).	No later than 1 November 2026
Any person may apply to AEMO for accreditation as a RTDAR	From 1 November 2026.
Enable all consumers to request access to RTD from the smart meter	1 January 2028

AEMO Procedure Consultation Milestones

Milestone	Timeline (as per AEMC Draft Rule)	AEMO Package 1 Timeline (AEMO preferred)	AEMO Package 2 Timeline (AEMO preferred)
Pre consultation	Not applicable (as AEMC Final Rule not published)	As soon as practicable after AEMC Final Rule being published	As soon as practicable after AEMC Final Rule being published
Initial Notice	Start of December 2025	Start of April 2026	November 2026
Final Determination	By end of June 2026	By 30 November 2026	By 1 May 2027

IEC Procedure Consultation Milestones (IEC)

Milestone	Timeline
Initial Notice	As soon as practicable after the Package 1 AEMO Final Determination is published Early February 2027 under AEMO’s preferred timeline
Final Determination	August 2027 under AEMO’s preferred timeline

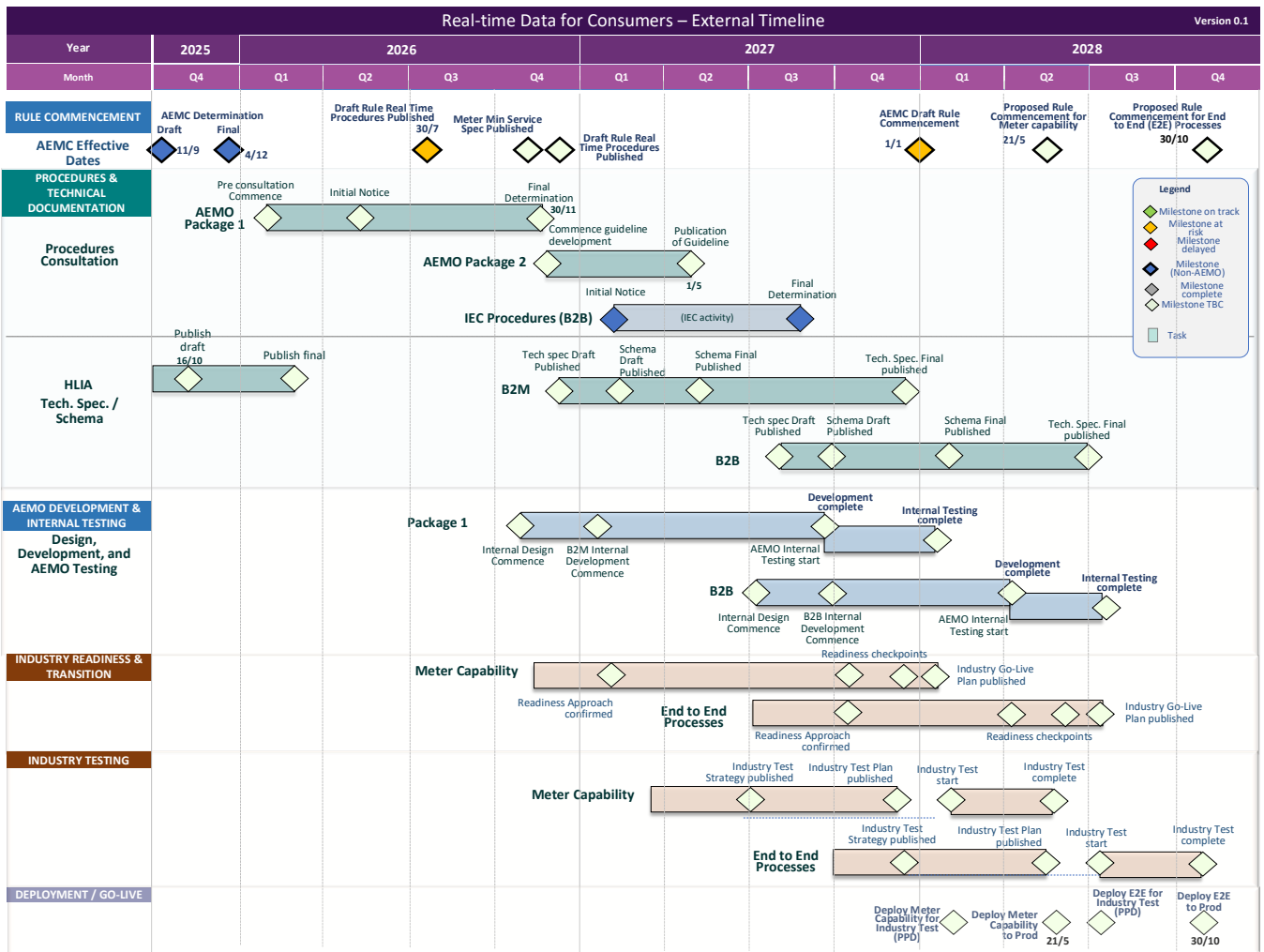
6.5.1 Industry Testing

Subject to industry feedback, AEMO believes that there may be value in enabling a longer testing window than usual to address the broader end-to-end process challenges associated with this reform. This would enable participants to multilaterally test these processes. AEMO would not manage or coordinate this testing but the timeline would facilitate this testing to occur.

Industry Testing Milestones

Scope	Dates for Meter Capability	Dates for End-to-End Processes
Industry Test Strategy published	Early July 2027	Early December 2027
Industry Test Plan published	End November 2027	Mid May 2028
Industry Testing commence	15 March 2028	Mid July 2028
Industry Testing complete	15 May 2028	Late October 2028

6.5.2 Indicative Draft Implementation Milestones



6.5.3 Relationships to other initiatives

Regarding other initiative specific relationships AEMO and the IEC considered:

- MITE project initiatives:
 - The RTD Rule is complementary but not contingent on the MITE project’s IDX or IDAM deliverables.

- IDX: The IDX Transition will migrate existing B2M and B2B business functions (e.g. CATS, NMID, SORD, OWN) onto the new IDX platform. While the RTD Rule does not introduce new business functions that depend on IDX, where the IDX Transition for NEM B2M and B2B aligns with the RTD rule effective date, the RTD data exchange requirements would be incorporated into the IDX schemas in addition to the existing aseXML schema.
- IDAM: The RTD Rule has no dependency on AEMO’s IDAM initiative. As a design principle, RTDAR parties will not leverage AEMO’s IDAM capabilities for authentication or authorisation.

For a ‘macro’ view of the NEM Reform Implementation Roadmap please refer to:

- <https://aemo.com.au/en/initiatives/major-programs/nem-reform-implementation-roadmap>

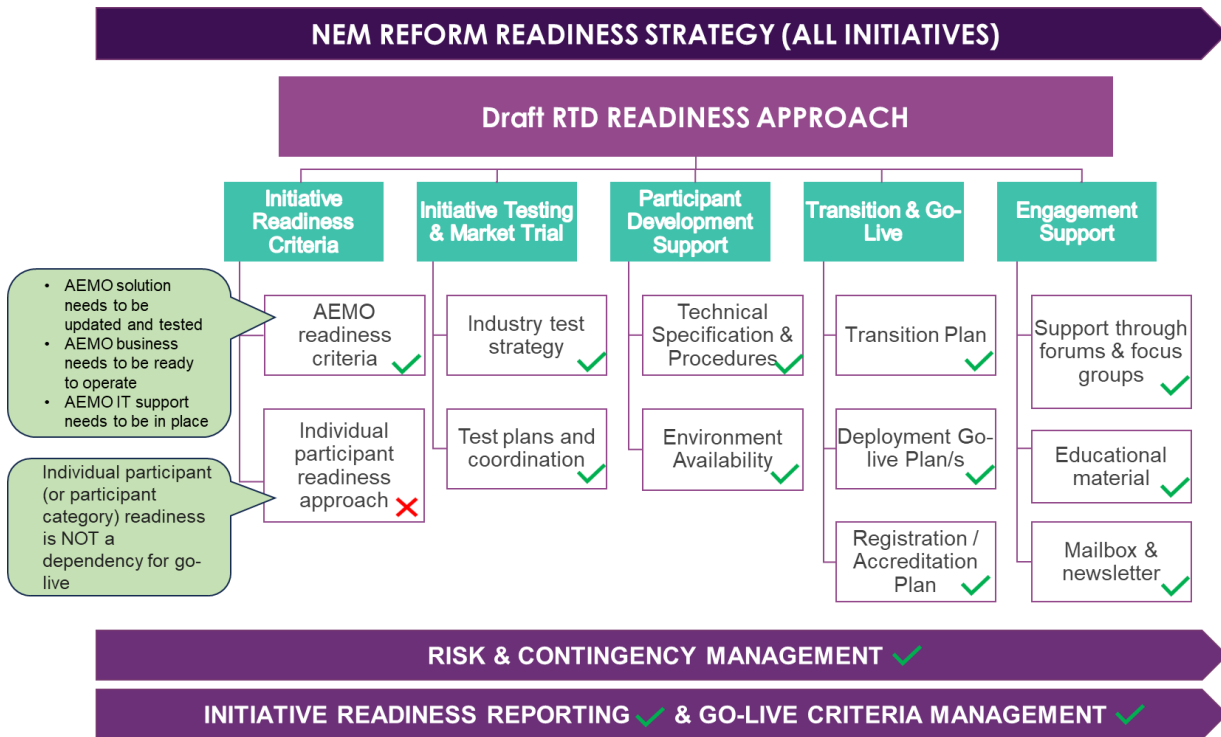
6.5.4 Risks and Issues

Initial Assessment of the risks

Risk ID	Identified Risk	Current Rating	Mitigation strategies	Residual Rating after mitigation
R_0001	AEMC Draft commencement date remains 1 January 2028 – during change freeze and limited resource period and misaligned with bi-annual system release timings.	High	AEMO’s AEMC Draft Report submission to indicate more appropriate dates and reasons	Medium
R_0002	The current timelines create a risk of inadequate design, limited stakeholder engagement, and insufficient participant preparation.	High	AEMO’s AEMC Draft Report submission to indicate more appropriate dates and reasons	Medium
R_0003	Material changes are made to the deliverables and scope of the final rule which require a substantial re-evaluation of the HLIA.	Medium	Submissions to, and engagement with, the AEMC consultation process	Low

6.6 Draft Industry Readiness Approach

This section shows AEMO’s early view of the RTD readiness approach. The following figure provides the indicative view of the RTD readiness approach, consistent with the NEM reform readiness strategy and the following table provides commentary on each of the readiness elements.



Draft RTD industry readiness approach

READINESS AREA		INITIAL VIEW OF INDUSTRY READINESS APPROACH
Initiative readiness criteria	Individual participant readiness approach	Individual Participant readiness is not considered a dependency for rule commencement. However, rule commencement may require individual participants to make changes to continue to comply with their NER and Procedural obligation Readiness criteria will be prepared and agreed for both releases supporting the RTD initiative
	AEMO readiness criteria	By the rule commencement date, AEMO’s: <ul style="list-style-type: none"> • Solution needs to be updated and tested to support updated AEMO and IEC procedures • Business needs to be ready to operate. • IT support needs to be in place.
Initiative testing and market trial	Market Trial strategy	<ul style="list-style-type: none"> • Scoping and planning will occur in collaboration with industry. • Market Trial approach along with detailed timings will be confirmed with the issue of the Test Strategy • Testing is expected to require co-ordinated AEMO and Participant activities to be confirmed during the industry test Strategy • AEMO has indicated 3 -month period to conduct the market trial prior to RTD commencement date running from mid-February to mid-May 2028 and the second release in November 2028 • Planning expectation is that this Industry test period will also support further initiatives (TBD) in line with a consolidated release strategy

READINESS AREA		INITIAL VIEW OF INDUSTRY READINESS APPROACH
	Test plans and coordination	<ul style="list-style-type: none"> • AEMO will provide a test plan outlining the proposed Test Scenarios and schedule. • Participant test plans are to be developed independently by impacted participants appropriate to own requirements. • Industry Test Working Group (ITWG) Q&A sessions available for updates on testing progress and for additional support. Sign up here.
Participant development support	Procedures	<ul style="list-style-type: none"> • Procedure consultations are required for both AEMO (B2M) retail procedures and IEC (B2B) procedures a per section 4
	Technical specifications	<ul style="list-style-type: none"> • Technical Specifications and schema updates will be developed to support participant scoping, and delivery in line with each scheduled release • Implementation approach is to provide initial versions of specification and schema as early as practical in the Implementation timeframe to support Participant delivery assessment • Updates to specification will be provided under change management in line with an agreed schedule • Final published versions of Schemas will be tracked directly as industry milestones
	Environment availability	<ul style="list-style-type: none"> • AEMO’s Preproduction environment will be available to support industry testing • No additional development support environment has been deemed necessary for early testing.
	IT development support	<ul style="list-style-type: none"> • As required, AEMO will provide industry support via NEM Reform forums, information sessions, focus groups and regular stand-ups for affected participants. These engagements will be scheduled as the IT design and approach is formalised to support participants development.
Transition and go-live	Transition plans	<ul style="list-style-type: none"> • Currently no requirement for a formalised industry Transition plan has been identified for this initiative
	Go-live plan	<ul style="list-style-type: none"> • Go-live plan for the production release covering key cutover timeframes, communications and participant co-ordinated activity (where required) will be needed for: <ul style="list-style-type: none"> • Schema releases • Alignment of participant and AEMO system deployments. • Post go-live support.
	Registration or accreditation plans	<ul style="list-style-type: none"> • Guidelines for Accreditation requirements are included in the scope of the procedures consultation
Risk & contingency management		<ul style="list-style-type: none"> • Will be developed in consultation with industry.

7 Market Systems Impact Assessment

AEMO and the IEC recognises the significant system and process changes needed by participants to meet the obligations of the Rule, including developing interfaces for B2M and B2B data exchanges with the Market (B2M) and other participants (B2B). This section focuses solely on the latter and does not address the updates participants must make within their systems to support their business processes. Given the diverse levels of system maturity and automation across participants, AEMO and the IEC cannot predict the exact scale or nature of these impacts for each participant. However, AEMO and the IEC can highlight common areas likely to be involved in most participants’ impact analyses to achieve the Rule outcomes.

7.1 NMI Data and Change Request Process

Focus Area	Impact Description
NMI data and Change Request Process	<ul style="list-style-type: none"> Introduction of new NMI Standing Data attributes to record whether a metering installation is RTD-capable and/or RTD-enabled Extension of the CR process to allow MPs to manage these RTD attributes

Participant Impacts

- MP will need to maintain new RTD data fields through MSATS
- Participants to adjust their B2M market systems to recognise RTD attributes in MSATS responses and reports
- Minor updates expected to CR handling and market system standing data repositories

7.2 Retail B2B Processes

Focus Area	Impact Description
Retail B2B Processes	<ul style="list-style-type: none"> Updates to B2B Service Orders and Notifications to include RTD-related enumerations or attributes Possible new Service Order SubType for enabling/disabling RTD and managing meter security credentials

Participant Impacts

- Participants will need to update B2B integration logic and B2B market systems
- B2B Validation and transaction management systems to be refreshed once AEMO publishes updated schemas

7.3 Tools and Data Interfaces

Focus Area	Impact Description
Tools and Data Interfaces	<ul style="list-style-type: none"> Updates to AEMO-supplied applications (Gateway Software, B2B Validation Module, Participant Batchter) to align with RTD schema changes

Participant Impacts

- Participants using AEMO-provided tools must upgrade to new releases



7.4 Data Exchange and Schema

Focus Area	Impact Description
Data Exchange	<ul style="list-style-type: none">• New aseXML and IDX schema versions for both B2M and B2B to incorporate RTD enumerations and attributes• Transitional support for prior (superseded) schema versions to maintain interoperability

Participant Impacts

- All Participants exchanging B2M or B2B data will need to assess schema version readiness and upgrade timing
 - Where IDX transition is in place for NEM B2M and B2B, effort to ensure compatibility across aseXML and IDX
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