



# Real-Time Data Procedures & B2M Development Consultation (Package 1)

Consultation paper -  
Standard consultation for the  
National Electricity Market

**4 May 2026**

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

Australian Energy Market Operator Ltd ABN 94 072 010 327

## Explanatory statement and consultation notice

This issues paper commences the first stage of the standard rules consultation procedure conducted by AEMO (**Consultation**) to consider the changes (**Changes**) which are proposed (**Proposal**) to the Retail Electricity Market Procedures (**Procedures**) to implement the National Electricity Amendment (Real-time data for consumers) Rule 2025 (**RTD Rule**). This consultation is being conducted under clause 7.16.7 of the National Electricity Rules (NER), in accordance standard rules consultation procedure is described in NER 8.9.2.

The RTD rule:

- Requires AEMO to publish real-time data procedures that specify relevant RTD standards, protocols and technical requirements
- Changes the meter minimum services specification, so that *small customer metering installations* from 30 November 2028 will be able to communicate real-time data wirelessly
- Requires metering coordinators (MCs) to facilitate access to RTD in accordance with a retailer's request
- Requires retailers to facilitate access to RTD
- Allows customers to request their retailers to facilitate access to real-time data from *small customer metering installations* from 30 November 2028
- Enables representatives appointed by customers (RTD Authorised Recipients) to be accredited by AEMO to access RTD, subject to the relevant customer's consent

The RTD Rule also introduces *energy ombudsman* requests for information or assistance from MCs, MDPs and MPBs, which is not specific to the provision of RTD.

This consultation considers three areas and their impacts on the Procedures:

### 1. Energy Ombudsman

- Update the Guide to the Role of the Metering Coordinator requiring MC to respond to Retailer concerning energy ombudsmen requests for information or assistance.

### 2. RTDAR Accreditation, Registration and Deregistration

- Introduction of RTDAR into AEMO Procedures and accompanying artefacts.
- Publish a list of Accredited Real Time Data authorised recipients on AEMO website.
- Update to AEMO Standing Data Quality (SDQ) Reporting to communicate RTDAR De-registration.

### 3. Real-Time Data

- Publish Real-Time Data Procedure to enable RTD access from a *small customer metering installation*.
- Update the MSATS system and MSATS Procedures with new Real-Time Data standing data fields.
- Update the Guide to the Role of the Metering Coordinator with Real-Time Data NER and NERR references.

To help stakeholders and other interested parties respond to this Issues Paper, AEMO has published initial drafts of proposals available at: <https://aemo.com.au/en/consultations/current-and-closed-consultations>

## Consultation notice

AEMO is now consulting on this proposal and invites written submissions from interested persons on the issues identified in this paper to [nem.retailprocedureconsultations@aemo.com.au](mailto:nem.retailprocedureconsultations@aemo.com.au) by 5:00pm (Melbourne time) on **16 June 2026**.

Submissions may make alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective in section 7 of the National Electricity Law. Please include supporting reasons.

Before making a submission, please read and take note of AEMO's consultation submission guidelines, which can be found at <https://aemo.com.au/consultations>. Subject to those guidelines, submissions will be published on AEMO's website.

Please identify any parts of your submission that you wish to remain confidential and explain why. AEMO may still publish that information if it does not consider it to be confidential but will consult with you before doing so. Material identified as confidential may be given less weight in the decision-making process than material that is published.

Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Interested persons can request a meeting with AEMO to discuss any particularly complex, sensitive or confidential matters relating to the proposal. Please refer to NER 8.9.1(k). Meeting requests must be received by the end of the submission period and include reasons for the request. We will try to accommodate reasonable meeting requests but, where appropriate, we may hold joint meetings with other stakeholders or convene a meeting with a broader industry group. Subject to confidentiality restrictions, AEMO will publish a summary of matters discussed at stakeholder meetings.

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# 1. Stakeholder consultation process

As required by the National Electricity Rules (**NER**), AEMO is consulting on the implementation of the AEMC Real-Time Consumer Data rule in accordance with the standard rules consultation procedure in NER 8.9.2.

Note that this document uses terms defined in the NER, which are intended to have the same meanings.

AEMO's indicative process and timeline for this consultation is outlined below. Future dates may be adjusted, and additional steps may be included, if necessary, as the consultation progresses.

Consultation steps	Dates
Consultation paper published	4 May 2026
Submissions due on consultation paper	16 June 2026
Draft report published	11 August 2026
Submissions due on draft report	9 September 2026
Final report published	4 November 2026

## 1.1.1. Pre-consultation

AEMO has conducted several pre-consultation activities prior to commencing this formal process, which included:

### High Level Implementation Assessments (HLIA)

AEMO provided stakeholders a 'point-in-time' preliminary implementation assessment of the AEMC Real-Time Consumer Data Rule.

- Draft HLIA – Published October 2025, including a webinar session
- Final HLIA - Published March 2025

### Real-Time Data Working Group (RTDWG)

AEMO proposed, supported and facilitated the establishment of a bespoke Industry Real Time Data Working Group (RTDWG), to collaboratively identify potential impacts to:

- AEMO's Retail Electricity Market Procedures (REMP)
- The Information Exchange Committee (IEC) B2B Procedures
- AEMO's supporting systems (including MSATS and the B2B eHub)

The RTDWG comprises members of the Electricity Retail Consultative Forum (ERCF) subgroup and the Business-to-Business Working Group.

Engagement with the RTDWG has been very valuable in informing AEMO's considerations in this Issues Paper.

### Metering Coordinators (MC) and Meter Manufacturer Technical Discussions

AEMO met with MCs, Meter Manufacturers and technology providers on a one-on-one basis to consider the AEMC's Real-Time Consumer Data Rule from a physical metering and cyber perspective. Feedback from these sessions has also been an important input into the development of this Issues Paper.

## 2. Background

### 2.1. Context for this consultation

On 18 December 2025, the Australian Energy Market Commission (AEMC) published its final determination and rule detailing a framework to enable access to RTD from smart meters.

The National Electricity Amendment (Real-time data for consumers) Rule 2025 (**Real-Time Consumer Data Rule**) commences over five dates.

- **From 26 November 2026**, MCs must respond to Retailer requests for information or assistance on an Energy Ombudsman requests
- **By 30 November 2026**, AEMO must establish, maintain and publish the real-time data procedures
- **By 1 May 2027**, AEMO must publish the RTDAR Accreditation Guidelines
- **From 2 May 2027**, any person may apply to AEMO for RTDAR Accreditation
- **From 30 November 2028**, *small customer metering installations* must be able to communicate real-time data wirelessly.

AEMO is proposing to consult on the Real-Time Consumer Data Rule across two consultations.

**Table 1: Overview of AEMO RTD Consultations**

Consultation Name	Real-Time Data Procedures and B2M Development (Package 1)	AEMO RTDAR Accreditation Guideline (Package 2)		
Consultation Scope	<b>Energy Ombudsman</b> <ul style="list-style-type: none"> <li>Update the Guide to the Role of the Metering Coordinator</li> </ul>	<u>Effective date</u> <b>26 Nov 2026</b>	Publish the Real-Time Data Authorised Recipient Accreditation (RTDAR) Guidelines	<u>Effective date</u> <b>No later than 1 May 2027</b>
	<b>RTDAR Accreditation, Registration and Deregistration</b> <ul style="list-style-type: none"> <li>Introduce RTDAR into AEMO Procedures and accompanying artefacts</li> <li>Publish list of Accredited Real Time Data authorised recipients on AEMO Website</li> <li>Update AEMO Standing Data Quality (SDQ) Reporting to communicate RTDAR De-registration</li> </ul>	<b>2 May 2027</b>		
	<b>Real-Time Data</b> <ul style="list-style-type: none"> <li>Publish Real-Time Data Procedure</li> <li>RTD in MSATS - Update MSATS system and MSATS Procedures</li> <li>Update the Guide to the Role of the Metering Coordinator with Real-Time Data NER and NERR references</li> </ul>	<b>30 Nov 2028</b>		
Consultation Dates	Final publication date by 26 November 2026 (aligning to Energy Ombudsman rule effective date)	Consultation commencement following publication of Package 1.		

This consultation is seeking stakeholder feedback regarding the AEMO Package 1 Real-Time Data Procedures and B2M Development.

## 2.2. NER requirements

AEMO is responsible for the establishment and maintenance of retail electricity market procedures specified in NER Chapter 7, except for procedures established and maintained under NER 7.17.

The procedures authorised by AEMO under NER Chapter 7 must be established and maintained by AEMO in accordance with the NER consultation procedures.

## 2.3. The national electricity objective

Within the specific requirements of the NER applicable to this proposal, AEMO will seek to make a determination that is consistent with the national electricity objective (NEO) and, where considering options, to select the one best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law as:

to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity with respect to:

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of the national electricity system; and
- (c) the achievement of targets set by a participating jurisdiction—
  - (i) for reducing Australia’s greenhouse gas emissions; or
  - (ii) that are likely to contribute to reducing Australia’s greenhouse gas emissions.

## 3. Energy Ombudsman request for information or assistance

### 3.1. Description and effect of proposal

Information held by MCs, MPs and MDPs can be important for the resolution of disputes and customer complaints; however, retailers and energy ombudsmen have no pathway to access this information.

The Real-Time Consumer Data Rule requires metering service providers (MCs, MDPs and MPs) to comply with information requests from retailers where the retailer has received a request for information or assistance from an energy ombudsman to resolve a complaint or dispute and specifically:

- provide any relevant information in their custody or control
- respond to any reasonable request for assistance

To enable the Energy Ombudsman to request information or assistance, AEMO propose to update the 'Guide to the Role of the MC' to include reference to new NER 7.3.2(p) which requires MCs to respond Retailer requests for information or assistance on an Energy Ombudsman request providing:

1. Provide any relevant information that is in its custody or control.
2. Respond to any reasonable request for assistance.
3. Where information or assistance needs to be provided by the Metering Data Provider or Metering Provider, request that the information or assistance be provided.'

### 3.2. Proposed effective date

In accordance with the Real-Time Consumer Data Rule, from 26 November 2026, MCs must respond Retailer requests for information or assistance on an Energy Ombudsman request. AEMO proposes to align the proposed changes to the 'Guide to the Role of the Metering Coordinator' to 26 November 2026.

### 3.3. Issues for consultation

#### Questions

- **Do you agree with AEMO's proposed changes to the 'Guide to the Role of the Metering Coordinator' in respect to energy ombudsman requests for information or assistance?**
- **Are there any additional changes to the 'Guide to the Role of the Metering Coordinator', or any other AEMO Procedure, you believe are necessary in respect to energy ombudsman requests for information or assistance? If yes, please provide your proposed changes to relevant clauses.**

## 4. RTDAR Accreditation, Registration and Deregistration Proposal discussion

### 4.1. Description and effect of proposal

The Real-Time Consumer Data Rule introduces a new accredited RTD Authorised Recipient (RTDAR) Role which allows RTD to be accessed by a third party on behalf of the customer.

To become an RTDAR, all parties who are not already registered participants, must be accredited by AEMO.<sup>1</sup> From 2 May 2027, any person may apply to AEMO for RTDAR accreditation, noting that a person's RTDAR accreditation will take effect from the RTD commencement date of 30 November 2028. Between the AEMO approval date of a successful application and the Rule commencement date, any RTDAR accreditation will be treated as prospective accreditation.

RTDARs will not be provided a MarketNet connection, as access to MSATS or the B2B eHub will not be required. RTDARs will however be assigned an 'RTDAR Participant ID' to enable the identification of RTDARs in MSATS.

Following successful RTDAR accreditation, AEMO will communicate details associated to the new RTDAR via AEMO market communications and update a list of accredited RTDARs on AEMO's website.

To implement AEMO's RTDAR Accreditation, Registration and Deregistration processes, AEMO will:

1. Update relevant AEMO Procedures and accompanying artefacts.
2. Publish a list of Accredited RTDARs on its website.
3. Communicate De-registration of an RTDAR via market communications and AEMO Standing Data Quality (SDQ) Reports.

#### 4.1.1. Update relevant AEMO Procedures and accompanying artefacts

To enable the implementation of the Real-Time Consumer Data Rule, specifically the Accreditation, Registration and Deregistration of an RTDAR, AEMO proposes to update the following procedures and accompanying AEMO artefacts.

- **Retail Electricity Market Glossary & Framework:**
  - Insert the following terms:
    - RTD
    - RTD Device
    - RTDAR
    - Real-Time Data Authorised Recipient (RTDAR) Accreditation Guidelines (effective from 2 May 2027)
    - Real-Time Data Procedure (effective from 30 November 2028)
  - Update the applicable illustrations and sections to include references to the Real-Time Data Procedure and Real-Time Data Authorised Recipient (RTDAR) Accreditation Guidelines.

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<sup>1</sup> NERR 59D (2)

- **Qualification Procedure:**
  - Any person applying for accreditation and registration must complete the qualification process described in the Qualification Procedure. AEMO considers updates to the Qualification Procedure is necessary to implement RTDAR Accreditation, Registration and Deregistration in accordance with the AEMC Real-Time Consumer Data rule clause 7.4.5.
- **Default and Deregistration Procedure:**
  - The Default and Deregistration Procedure details how AEMO will address failures in meeting the conditions of accreditation, be that in compliance with the NER or any applicable procedures under the NER. Updates to the Default and Deregistration Procedure is required to implement RTDAR Accreditation, Registration and Deregistration in accordance with the Real-Time Consumer Data rule clause 7.4.4(a1).
- **Application Form:**
  - The Application Form is required to be completed and submitted to AEMO to initiate accreditation and registration processes. AEMO considers updates to the Application Form is necessary for a prospective RTDAR to apply for RTDAR Accreditation in accordance with the Real-Time Consumer Data rule clause 11.189.3.
- **Accreditation Checklist:**
  - The Accreditation Checklist details questions applicants are required to complete as part of the qualification process set out in the Qualification Procedure. A new applicant must complete all the relevant Accreditation Checklist questions relating to the applicable categories of registration. Updates to the Accreditation Checklist are necessary to implement RTDAR Accreditation in accordance with the Real-Time Consumer Data rule.

#### 4.1.2. Publishing of Accredited RTDARs

AEMO recognises that prior knowledge and visibility of accredited RTDARs will be required by Retailers when performing validations on requests to access RTD.

In a similar manner as the list of Accredited MDPs, MPBs and ENMs, AEMO proposes to publish a list of Accredited RTDARs to the AEMO website, including general contact information and the RTDAR Participant ID. AEMO will publish list following first successful RTDAR accreditation.

#### 4.1.3. Communication of RTDAR Deregistration

Participants' preferred processes associated to the deregistration of a RTDAR was considered by the RTDWG. The RTDWG recommended that upon reception of an AEMO RTDAR De-registration market communication:

- MCs would proactively, i.e. without explicit direction from the applicable Retailer, revoke applicable RTD access(es).
- Retailers would manage any associated communication with the customer.

AEMO proposes to advise Participants of RTDAR Deregistration through the provision of:

- A market communication, included in AEMO's existing weekly industry communications newsletter.
- SDQ reports, provided to the current MC and the current FRMP. These reports would include:
  - The applicable RTDAR Participant ID.

- The associated list of impacted NMIs i.e. NMIs where the RTDAR Participant ID is current against a NMI in MSATS. Refer to Section 6 for further information.

## 4.2. Proposed effective date

As per the Real-Time Consumer Data Rule, from 2 May 2027, any person may apply to AEMO for RTDAR Accreditation. AEMO therefore proposes an effective date of 2 May 2027 for the associated changes to the:

- Retail Electricity Market Glossary & Framework
- Qualification Procedure
- Default and Deregistration Procedure
- Accreditation Checklist
- Application Form

AEMO proposes to align the communication of an RTDAR Deregistration, through market communications and SDQ reports, to the commencement of Schedule 2 of the Real-Time Consumer Data Rule of 30 November 2028.

AEMO will publish list of accredited RTDARs to the AEMO website following first successful RTDAR accreditation.

## 4.3. Issues for consultation

### Questions

- **Do you agree with AEMO's proposed changes supporting the inclusion of RTDARs into AEMO Procedures and accompanying artefacts. If no, please provide specify details.**
- **Do you agree with AEMO's proposal to publish and manage a list of accredited RTDARs on its website? If no, please provide details of your preferred alternative.**
- **Do you agree with AEMO's proposal that upon a RTDAR De-Registration, AEMO will communicate the RTDAR deregistration through a combination of SDQ reports and AEMO's weekly communications?? If no, please provide details of your preferred alternative.**

## 5. Real-Time Data Procedure

### 5.1. Context

The provision of RTD from *small customer metering installations* is intended to support improved consumer engagement with energy use, facilitate innovation in energy services, and enable more effective integration of Consumer Energy Resources into the NEM.

The Real-Time Consumer Data Rule requires AEMO to develop a Real-Time Data Procedure under clause 7.16.6E. The Procedure must specify the minimum technical, operational and security requirements for facilitating access to RTD.

In accordance with the AEMC Real-Time Consumer Data rule clause 7.16.6E, the Procedure must include:

- Requirements for ensuring secure access to RTD by devices external to the *metering installation*.
- Minimum measurement requirements, including resolution and sampling frequency for RMS voltage, current, and phase angle.
- Open standards-based communications protocols for the provision of RTD.
- Circumstances where:
  - The timeframe for facilitating access to RTD may be extended.
  - A retailer is not required to facilitate access to RTD.

The Rule also permits AEMO to include additional matters, where reasonably necessary, including:

- Minimum security controls.
- A standard format for RTD.
- Processes for managing challenging or constrained deployment scenarios.
- Communication mechanisms to support delivery of RTD.

### 5.2. Regulatory Approach and Design Principles

In developing the draft Procedure, AEMO has adopted the following principles:

#### **Outcomes-based, not technology-prescriptive**

The NER does not prescribe specific technologies for delivering RTD. Consistent with the competitive nature of the NEM metering framework, AEMO has adopted an outcomes-based approach which:

- Supports interoperability through open standards.
- Avoids mandating specific communications technologies or protocols.
- Enables innovation and evolution of technical standards over time.

Through pre-consultation, AEMO observed a high degree of convergence in potential technical solutions, including the use of specific short-range wireless technologies and a relatively limited set of application layer protocols. This indicates that relevant industry participants are already progressing interoperable and standards-based approaches.

In this context, AEMO considers that prescribing specific communications technologies or protocols would introduce unnecessary regulatory risk, including:

- Technology obsolescence risk, where mandated solutions may become outdated over time.
- Reduced innovation, by constraining alternative or improved technical approaches.
- Distortion of risk allocation, by transferring technology selection risk from MCs and metering equipment vendors to consumers.

AEMO considers that in a contestable metering market, MCs and technology providers, working with their clients, are best placed to select and evolve technical solutions and manage associated technology and obsolescence risks.

Accordingly, the Procedure adopts a principles-based framework that enables interoperability and security while preserving flexibility for market-led innovation.

#### **Alignment with existing regulatory obligations**

The Procedure is not intended to restate obligations already defined in the NER or the National Energy Retail Rules (NERR), except where it is necessary to:

- Operationalise those obligations.
- Provide clarity on their application in the context of RTD within the scope of AEMO's authority.

Participants remain responsible for interpreting and complying with their obligations under the NER and NERR.

#### **Proportionate security uplift**

The introduction of RTD creates a new communications pathway to the metering installation, increasing the potential scope for attack. AEMO considers it necessary to introduce minimum security expectations, while avoiding overly prescriptive requirements that may not be feasible or would impose disproportionate costs.

### **5.3. RTD Communications (Procedure Section 3)**

The Real-Time Consumer Data Rule requires RTD to be delivered via a wireless, unidirectional communication pathway and to support access by multiple parties. However, it does not describe how this is to be implemented.

Through pre-consultation, AEMO observed a range of potential architectures, including direct device-to-metering installation communications, and gateway-based solutions (e.g. through customer routers).

AEMO proposes an architecture-neutral framework, under which:

- The MC is responsible for enabling RTD at the metering installation interface.
- The specific method of delivery is not prescribed.
- Multiple implementation models are permitted, provided they meet the requirements of the Procedure.

This approach recognises that:

- MCs and manufacturers are best placed to determine appropriate technical solutions.
- Different premises and device ecosystems may require different approaches.
- Mandating a single architecture would create unnecessary constraints.

### **Communication Protocols**

The Procedure (Section 3.2) requires the use of open standards-based protocols at both the communication and application layers.

AEMO has not mandated specific protocols, but instead requires that protocols:

- Are publicly documented.
- Support authentication and encryption.
- Enable interoperable implementation.

This reflects the varying stakeholder views of standardisation observed by AEMO during pre-consultation. While some stakeholders supported mandated protocols to promote uniformity, others highlighted risks of locking in specific technologies and limiting the ability to adopt improved or emerging standards.

AEMO considers that specifying characteristics, rather than technologies, appropriately balances interoperability and innovation.

### **Security and Threat Assessment**

The introduction of RTD represents a material change to the security posture of metering installations, by enabling external connectivity and increasing the number of potential access points.

To address this, Section 3.3 introduces requirements for:

- Encryption and authentication.
- Prohibition of control functions via RTD.
- Isolation of RTD communications from metering functions.
- Documented security risk assessments.

The Procedure requires MCs to undertake and maintain a documented security risk assessment using recognised methodologies (e.g. STRIDE or equivalent), and to implement controls across prevention, detection, response, and recovery phases.

AEMO has adopted a risk-based and outcome-focused approach, rather than prescribing specific security controls or frameworks. This reflects the diversity of metering technologies that are available for use in the NEM, and the need to maintain flexibility while ensuring an appropriate minimum-security posture.

AEMO also proposes that MCs should have regard to recognised cybersecurity guidance, including that published by the Australian Signals Directorate, and that cryptographic implementations should align with contemporary industry best practice, avoiding prescriptive standards that may become outdated over time.

### **Protection of Metering Installation Integrity**

AEMO considers it critical that RTD access does not compromise the integrity or the operation of the metering installation.

The Procedure, Section 3.3, requires that RTD communications are effectively isolated from metrology and control functions; and that this isolation remains robust even where RTD communications functions are subject to compromise.

This requirement is aligned with section 2.2 of the Procedure and reflects the broader obligations of MCs under the NER to maintain metering installation integrity.

## 5.4. RTD Access Lifecycle (Procedure Section 4)

### Establishment and Management of Access

Section 4.1 defines the process for establishing RTD access and requires MCs to:

- Facilitate access upon request from the retailer.
- Ensure access is limited to authorised devices and recipients.

To support transparency and auditability, Section 4 requires MCs to maintain a register of RTD connections, including relevant device and recipient information. This register is intended to provide traceability of access, support compliance monitoring and enable downstream processes, including retailer obligations.

### Information Sharing with FRMPs

Section 4.5 introduces an obligation for MCs to provide Retailers (aka Financially Responsible Market Participants (FRMPs)) with information on active RTD access arrangements. AEMO considers that this is necessary to support retailer obligations to manage consent and access, enable continuity during retailer churn, and improve visibility of third-party access at connection points.

### Timeframe Extensions and Infeasibility of RTD Access

Section 4.2 specifies circumstances where the timeframe for facilitating RTD may be extended, including:

- Metering installation malfunctions.
- Inability to access premises.

These provisions are intended to reflect temporary and resolvable constraints, while maintaining an expectation that RTD will be facilitated where practicable.

Section 4.3 defines circumstances where RTD access is not required to be facilitated, including:

- Lack of RTD capability.
- Inability to establish communications.
- Unresolved access constraints.

AEMO has proposed varying timeframe extensions for temporary delays versus enduring infeasibility.

### Revocation of Access

Section 4.4 defines circumstances where RTD access must be revoked, including:

- Withdrawal of customer consent.
- RTDAR deregistration.
- Invalid or expired credentials.

AEMO considers it appropriate that RTD access arrangements are reviewed and updated in response to participant churn events.

AEMO also considered whether RTD access related to a temporal role holder at a NMI (e.g. the entity in the FRMP role that is also an active RTDAR) should automatically be considered to have expired upon the cessation of their primary role at the NMI (in this example, where the entity is no longer appointed as FRMP by the customer). Feedback from stakeholders during pre-consultation, including the RTDWG, stated that this is not necessary, as it may create unnecessary complexity and unintended consequences.

## 5.5. RTD Quality and Performance (Procedure Section 5)

### Measurement Requirements

Section 5 specifies minimum requirements for measurement parameters (RMS voltage, current, phase angle), resolution, and sampling frequency.

These requirements are intended to ensure that RTD is meaningful and useable, and sufficiently consistent across implementations.

### Latency and Communications Performance

Section 5.2 introduces minimum expectations for RTD latency and communications performance. AEMO considers that timeliness is a key attribute of RTD and has therefore:

- Specified a latency expectation within a defined reference environment (e.g. 10 metres).
- Clarified that MC responsibility is limited to the metering installation interface.

This approach recognises that performance is influenced by factors beyond the MCs control, including customer premises and third-party devices.

## 5.6. RTD Standard Format (Procedure Section 6)

Section 6 introduces a minimum RTD data structure, including:

- Core measurement values.
- Measurement identifiers.
- Defined measurement codes.

The proposed format is intentionally minimal and protocol-agnostic, to:

- Support interoperability.
- Reduce integration complexity.
- Enable flexibility across different implementations.

## 5.7. RTDAR Obligations, Compliance, and Monitoring (Procedure Section 7)

Section 7 aligns RTDAR obligations with existing NERR requirements, including:

- Obtaining and managing customer consent.
- Limiting use of RTD to authorised purposes.
- Ceasing access and deleting data when authorisation ends.

The Procedure reinforces that RTD constitutes confidential information and must be handled accordingly.

Section 7 also includes provisions for:

- Compliance monitoring.
- Audit and information requests.

- Record-keeping obligations.

These provisions are intended to ensure that the requirements of the Procedures are enforceable and supported by appropriate evidence.

## 5.8. RTDAR Accreditation Management (Procedure Section 6)

Section 8 details process requirements of AEMO RTDAR Accreditation.

## 5.9. Proposed effective date

To align with the commencement date of Schedule 2 of the Real-Time Consumer Data Rule, AEMO proposes an effective date of 30 November 2028 for the Real-Time Data Procedure.

## 5.10. Issues for consultation

### Questions

- Do you agree with AEMO's proposed overall approach to the RTD Procedure?
- In general terms, when considering the initial Procedure draft:
  - What implementation challenges do you foresee in complying with the Procedure?
  - What aspects of the Procedure would benefit from further clarification or guidance?
  - What unintended consequences or risks should AEMO consider in finalising the Procedure?
- Do you agree with the proposed approach and content in Section 3 (RTD Communications) of the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What additional guidance, if any, would assist in implementing RTD communications architectures?
- Do you agree with the proposed approach and content in Section 3.2 (Communications Protocols) of the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What additional guidance, if any, would assist in supporting implementation of open standards-based protocols?
- Do you agree with the proposed approach and content in Section 3.3 (Security) of the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What challenges may arise in implementing controls across prevention, detection, response and recovery?
  - What additional guidance, if any, would support effective implementation of RTD security requirements?
- Do you agree with the proposed approach and content in Section 4 (RTD Access) in the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What additional information is necessary to include in the Procedure to effectively manage RTD access over its lifecycle?
  - What additional scenarios, if any, should be considered for extending facilitation timeframes?

**Questions**

– What risks, if any, may arise from application of infeasibility provisions, that should be considered for the Procedure?

• Do you agree with a periodic, e.g. 6 months, revalidation of RTD Accesses should be performed by current MC?

• Do you agree with the proposed approach and content in Section 5.1 of the Procedure, which specifies minimum requirements for measurement parameters (RMS voltage, current, phase angle), resolution, and sampling frequency? If no, please provide specific details of your proposed changes.

• Do you agree with the proposed approach and content in Section 5.2 of the Procedure, which proposes minimum expectations for RTD latency and communications performance? If no, please provide specific details of your proposed changes.

– How achievable are the proposed latency expectations within the defined reference environment?

– What challenges may arise in demonstrating compliance with the measurement, latency and performance requirements?

• Do you agree with the proposed approach and content in Section 6 of the RTD Procedure, which proposes a minimum RTD data structure? If no, please provide specific details of your proposed changes.

– How well does the proposed structure support the delivery of RTD across systems and devices?

– What, if anything, in relation to the format, would improve support for RTD operation?

• Do you agree with the proposed approach and content in Section 7 of the RTD Procedure, which proposes RTDAR Obligations, Compliance and Monitoring? If no, please provide specific details of your proposed changes.

– What material challenges may arise in meeting obligations relation to use, storage and deletion of RTD?

– What additional guidance would support RTDAR compliance with these requirements?

• Do you agree with the proposed approach and content in Section 8 of the RTD Procedure, which proposes RTDAR Accreditation Requirements?

## 6. RTD in MSATS

### 6.1. Description and Effect of Proposal

#### 6.1.1. RTD Roles in MSATS

During pre-consultation, the RTDWG considered what type of information could be maintained in MSATS to support the efficient provisioning of RTD<sup>2</sup>, including:

- Recording of at least four parties at the same time<sup>3</sup> for the following types of RTD access:
  - Consumer
  - Parties having RTD access where consumer consent is required
  - Parties having RTD access where consumer consent is not required
- Recording revoking/change of RTD access

Members noted that an MSATS solution was preferred because:

- It would support more efficient and effective consumer engagements.
- It would support more efficient and effective 'downstream' Industry processes.

The RTDWG proposed that the current MC would maintain the RTD accessing parties in MSATS, at a Meter level, for the following reasons:

- Alignment to the level of detail required to support accurate RTD access requests.
- Clarity of the relationships between the accessing party, the applicable meter and the associated devices.

AEMO advised the RTDWG that to enable a solution at the meter level, a new CATS table would need to be implemented. This new table would represent additional costs and effort for industry, to configure associated systems and processes, compared to a more efficient solution at the NMI level. Working group members had mixed opinions on whether introducing a new CATS table would represent sufficient value for industry and consumers.

#### 6.1.2. RTD Capability in MSATS

In accordance with the Real-Time Consumer Data Rule, a MC is obligated to confirm if a specific *metering installation* meets the applicable minimum services specification<sup>4</sup>. During pre-consultation, the RTDWG proposed that an installation's RTD capability should be maintained in MSATS.

The RTDWG's preference was for the current MC to maintain this information, at a meter level, to enable:

- Efficient Retailer engagements with consumers regarding next steps, and potential costs, associated with a RTD access request.

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<sup>2</sup> NER 7.15.7 (d)(2)

<sup>3</sup> The AEMC RTD Final Determination, Section 4.1.2 states 'it is appropriate for MSATS to include information about the metering installation in relation to real-time data services'

<sup>4</sup> NER 7.15.7(c)(2)

- The provision of meter level clarification associated to multi metered sites.
- Improved transparency and overall operational efficiency.

It is worth noting that the RTDWG also discussed other potential pieces of information which could be maintained in MSATS, however, the use cases and the required level of detail supporting these items were not sufficiently established.

### 6.1.3. Options: RTD in MSATS

AEMO maintains the Real-Time Consumer Data Rule obligation applies to a NMI i.e. a *small customer meter installation*.

In the following section, AEMO has detailed two options to record RTD information at an NMI level in MSATS.

#### Option 1 – Record RTD information in the CATS\_NMI\_PARTICIPANT\_RELATIONS (CNPR) & CATS\_NMI\_DATA (CND)

1. Enable the current MC to retrospectively populate the following in **CNPR** table:
  - x5 new roles to record parties where consumer consent was gained populated with Participant ID, RTDAR Participant ID or ‘NOPARTY’ Participant ID (where a party is no longer accessing RTD)
  - x2 new roles to record parties where consumer consent was not required populated with Participant ID or ‘NOPARTY’ Participant ID
2. Enable the current MC to retrospectively populate the following in **CND table**:
  - x1 new field identifying where a Consumer is the party accessing RTD populated with Y or null.
  - x1 new field identifying if NMI is RTD Capable populated with Y or null.

**Table 2: RTD in MSATS – Option 1**

CNPR	Description
RTD1	<b>Consumer Consent has been obtained to access RTD.</b> Populated with Participant ID, RTDAR Participant ID or NOPARTY Participant ID
RTD2	
RTD3	
RTD4	
RTD5	
RTN1	<b>Consumer Consent is not required to access RTD.</b> Populated with Participant ID or NOPARTY Participant ID
RTN2	

CND	Description
RTD Consumer	<b>Consumer is accessing RTD.</b> Populated with Y or null.
RTD Capable	<b>The metering installation is capable of providing RTD.</b> Populated with Y or null.

**Option 2 – Record RTD fields in the CATS\_NMI\_DATA (CND) only**

1. Enable the current MC to retrospectively populate the following new RTD MSATS fields stored in the CND table:
  - x5 new RTD Consent fields populated with Participant IDs, RTDAR Participant ID or null.
  - x2 new RTD No Consent fields with Participant IDs or null.
  - x1 new Consumer field identifying where a Consumer is the party accessing RTD populated with Y or null.
  - Identification if the NMI is RTD Capable populated with Y or null.

**Table 2: RTD in MSATS – Option 2**

Proposed new CND Fields	Description
RTD Consent Role 1	<b>Consumer Consent has been obtained to access RTD.</b> Populated with Participant ID, RTDAR Participant ID or null.
RTD Consent Role 2	
RTD Consent Role 3	
RTD Consent Role 4	
RTD Consent Role 5	
RTD No Consent Role 1	<b>Consumer Consent has not been obtained to access RTD.</b> Populated with Participant ID or null.
RTD No Consent Role 2	
RTD Consumer	<b>Consumer is accessing RTD.</b> Populated with Y or null.
RTD Capable	<b>The metering installation is capable of providing RTD.</b> Populated with Y or null.

In both Option 1 and Option 2, RTD information in MSATS would be:

- Capable of being updated in one or more CATS change requests
- Provided in NMI Discovery Type 1 and Type 2 requests
- Provided in applicable CATS Reports e.g. the C1 and C4 reports
- Validated by MSATS:
  - Participant ID or RTDAR Participant ID is permitted in the appropriate type of RTD role (i.e. requires consent or does not require consent)
  - Apply to only CATS NMIClassificationCode = 'SMALL' (which does not necessarily mean this is a *small customer*)
  - Apply to current CATS MeterInstallationTypeCodes = 'COMMS4D', 'COMMS4C' and 'MRAM'
  - Does not apply in jurisdiction of Victoria or to embedded network children.
- Capable of being referenced in applicable SDQ reports e.g.
  - RTDAR Deregistration identifying impacted NMIs
  - Identify discrepancies between RTD Capable and RTD Roles, NMI Classification or Meter Installation Type Codes
  - Identical participant ID or RTDAR Participant ID nominated in more than one RTD role at once

- Without applying the above MSATS validations, RTD Capable (only) field could be updated using Blind Update Tool (BUT)

AEMO notes that one of the advantages of Option 1 is that the number of RTD roles in the CNPR table is extensible and does not require a schema change. However, AEMO notes that a disadvantage of Option 1 is once a new role in the CNPR table is populated, the role can never be removed and where a party accessing RTD is no longer accessing RTD, the Current MC will need to insert 'NOPARTY' as the participant ID (similar to NSP2 use of 'DUMMY').

AEMO notes that an advantage of Option 2 is that where a party no longer has access to RTD, the party can be set to null. However, AEMO notes that a disadvantage of Option 2 is that the CND table was not designed for the population of roles, so after the initial implementation change, any future addition of RTD roles would require further software and schema changes.

AEMO notes that both Option 1 and Option 2 will not prevent a party being nominated for a particular NMI in multiple RTD roles concurrently. Both options require an initial schema change to implement the proposed changes to CND.

## 6.2. Proposed effective date

AEMO proposes to align the effective date of the proposed changes to the commencement date of Schedule 2 of the Real-Time Consumer Data Rule, 30 November 2028 in the following:

- MSATS Procedures - Principles and Obligations for all Connection Points
- Standing Data for MSATS

AEMO proposes that MSATS system changes and schema changes would align to scheduled AEMO system releases.

## 6.3. Issues for consultation

### Questions

- **Does your organisation prefer Option 1 or Option 2, for the recording of RTD fields in MSATS? Please provide the reasoning supporting your preference.**
- **Regarding Option 1, does your organisation support having one CATS change request or separate CATS Change requests to populate the CATS\_NMI\_PARTICIPANT\_RELATIONS (CNPR) & CATS\_NMI\_DATA (CND) tables? Please provide the reasoning supporting your preference.**
- **Would your organisation likely wish to use AEMO's Blind Update Tool (BUT) to initially populate the RTD fields prior to rule commencement?**

## 7. Other RTD Matters

### 7.1. Update Guide to the Role of the Metering Coordinator

The Guide to the Role of the Metering Coordinator is made under NER 7.3.1(c) and provides information on the roles and responsibilities of MCs under the NER and procedures authorised under the NER.

AEMO proposes to include RTD NER & NERR clause references in the Guide to the Role of the Metering Coordinator.

### 7.2. Proposed effective date

AEMO proposes to align the effective date of the required changes to the commencement date of Schedule 2 of the Real-Time Consumer Data Rule, 30 November 2028.

### 7.3. Issues for consultation

#### Questions

- **Do you agree with AEMO's proposed changes to the Guide to the Role of Metering Coordinator to include RTD NER & NERR clause references?**

## 8. Drafting for proposed changes

To help interested parties respond to this consultation paper, AEMO has published initial drafts incorporating the changes AEMO proposes for consultation. Change-marked versions are available at:

<https://aemo.com.au/en/consultations/current-and-closed-consultations>

Due an overlapping **May 2026 Consolidation** consultation, this initial stage of RTD Consultation has tracked changed a number of artefacts based on current versions published on AEMO website. The draft determination stage of this consultation will apply RTD changes to the May 2026 Consolidation documents as identified in table below.

In this initial stage, AEMO has not provided tracked changed artefacts for MSATS Procedures - Principles and Obligations for all Connection Points nor Standing Data for MSATS.

**Table 4: Real-Time Data Consultation artefacts**

Consultation Artefact Name	1. Energy Ombudsman	2. RTDAR Acc, Reg & De-Reg	3. Real-Time Data, RTD in MSATS & Other RTD Matters
Real-Time Data Procedure			Yes (v1.0)
MSATS Procedures - Principles and Obligations for all Connection Points			Yes <sup>5</sup>
Standing Data for MSATS			Yes <sup>6</sup>
Guide to the Role of Metering Coordinator	Yes <sup>7</sup>		Yes <sup>8</sup>
Retail Electricity Market Glossary & Framework		Yes <sup>9</sup>	
Audit Metering Coordinator Auditing Questions Template			Yes <sup>10</sup>
Qualification Procedure		Yes (v1.4)	
Accreditation Checklists		Yes (v4.0)	
Application Form		Yes	
Default and Deregistration Procedure		Yes (v1.2)	
Accredited RTDARs list (to be published on AEMO website)		Yes <sup>11</sup>	
<b>Effective Date</b>	<b>26 November 2026</b>	<b>2 May 2027</b>	<b>30 November 2028</b>

<sup>5</sup> RTD tracked changes provided only in RTD Draft Determination stage and applied to May 2026 Consolidated document

<sup>6</sup> RTD tracked changes provided only in RTD Draft Determination stage and applied to May 2026 Consolidated document

<sup>7</sup> RTD tracked changes to be applied to May 2026 Consolidation document in RTD Draft Determination stage

<sup>8</sup> RTD tracked changes to be applied to May 2026 Consolidation document in RTD Draft Determination stage

<sup>9</sup> RTD tracked changes to be applied to May 2026 Consolidation document in RTD Draft Determination stage

<sup>10</sup> RTD tracked changes to be provided in Draft Determination stage on latest version published on AEMO website.

<sup>11</sup> AEMO will publish list of Accredited RTDARs to the AEMO website following first successful RTDAR Accreditation.

## 9. Summary of issues for consultation

Submissions may be made on any matter relating to the proposal discussion in this consultation paper. AEMO would welcome comment and feedback on the following matters:

### Energy Ombudsman

#### Questions

- Do you agree with AEMO’s proposed changes to the ‘Guide to the Role of the Metering Coordinator’ in respect to energy ombudsman requests for information or assistance?
- Are there any additional changes to the ‘Guide to the Role of the Metering Coordinator’, or any other AEMO Procedure, you believe are necessary in respect to energy ombudsman requests for information or assistance? If yes, please provide your proposed changes to relevant clauses.

### RTDAR Accreditation, Registration and Deregistration

#### Questions

- Do you agree with AEMO’s proposed changes supporting the inclusion of RTDARs into AEMO Procedures and accompanying artefacts. If no, please provide specify details.
- Do you agree with AEMO’s proposal to publish and manage a list of accredited RTDARs on its website? If no, please provide details of your preferred alternative.
- Do you agree with AEMO’s proposal that upon a RTDAR De-Registration, AEMO will communicate the RTDAR deregistration through a combination of SDQ reports and AEMO’s weekly communications?? If no, please provide details of your preferred alternative.

### Real-Time Data Procedure

#### Questions

- Do you agree with AEMO’s proposed overall approach to the RTD Procedure?
- In general terms, when considering the initial Procedure draft:
  - What implementation challenges do you foresee in complying with the Procedure?
  - What aspects of the Procedure would benefit from further clarification or guidance?
  - What unintended consequences or risks should AEMO consider in finalising the Procedure?
- Do you agree with the proposed approach and content in Section 3 (RTD Communications) of the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What additional guidance, if any, would assist in implementing RTD communications architectures?
- Do you agree with the proposed approach and content in Section 3.2 (Communications Protocols) of the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What additional guidance, if any, would assist in supporting implementation of open standards-based protocols?

Questions

- Do you agree with the proposed approach and content in Section 3.3 (Security) of the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What challenges may arise in implementing controls across prevention, detection, response and recovery?
  - What additional guidance, if any, would support effective implementation of RTD security requirements?
- Do you agree with the proposed approach and content in Section 4 (RTD Access) in the RTD Procedure? If no, please provide specific details of your proposed changes.
  - What additional information is necessary to include in the Procedure to effectively manage RTD access over its lifecycle?
  - What additional scenarios, if any, should be considered for extending facilitation timeframes?
  - What risks, if any, may arise from application of infeasibility provisions, that should be considered for the Procedure?
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- Do you agree with the proposed approach and content in Section 5.1 of the Procedure, which specifies minimum requirements for measurement parameters (RMS voltage, current, phase angle), resolution, and sampling frequency? If no, please provide specific details of your proposed changes.
- Do you agree with the proposed approach and content in Section 5.2 of the Procedure, which proposes minimum expectations for RTD latency and communications performance? If no, please provide specific details of your proposed changes.
  - How achievable are the proposed latency expectations within the defined reference environment?
  - What challenges may arise in demonstrating compliance with the measurement, latency and performance requirements?
- Do you agree with the proposed approach and content in Section 6 of the RTD Procedure, which proposes a minimum RTD data structure? If no, please provide specific details of your proposed changes.
  - How well does the proposed structure support the delivery of RTD across systems and devices?
  - What, if anything, in relation to the format, would improve support for RTD operation?
- Do you agree with the proposed approach and content in Section 7 of the RTD Procedure, which proposes RTDAR Obligations, Compliance and Monitoring? If no, please provide specific details of your proposed changes.
  - What material challenges may arise in meeting obligations relation to use, storage and deletion of RTD?
  - What additional guidance would support RTDAR compliance with these requirements?
- Do you agree with the proposed approach and content in Section 8 of the RTD Procedure, which proposes RTDAR Accreditation Requirements?

### **RTD in MSATS**

#### Questions

- Does your organisation prefer Option 1 or Option 2, for the recording of RTD fields in MSATS? Please provide the reasoning supporting your preference.
- Regarding Option 1, does your organisation support having one CATS change request or separate CATS Change requests to populate the CATS\_NMI\_PARTICIPANT\_RELATIONS (CNPR) & CATS\_NMI\_DATA (CND) tables? Please provide the reasoning supporting your preference.
- Would your organisation likely wish to use AEMO's Blind Update Tool (BUT) to initially populate the RTD fields prior to rule commencement?

### **Other RTD Matters**

#### Questions

- Do you agree with AEMO's proposed changes to the Guide to the Role of Metering Coordinator to include RTD NER & NERR clause references?