

26 March 2026

Ms Anna Collyer
Chair
Australian Energy Market Commission
Sydney South NSW 1235

By online submission:

Dear Ms Collyer

AEMO Response to AEMC Consultation Paper – Non-controversial metering rule changes

AEMO welcomes the opportunity to provide a submission in response to the Australian Energy Market Commission’s (AEMC) consultation paper on the *Non-controversial metering rule changes*, published on 26 February 2026.

The consultation paper considers three rule change requests submitted by AEMO:

- ERC0414 – *Flexible communication requirements for SAPS generation connection points*
- ERC0413 – *Refining the eligibility requirements for Secondary Settlement Points*
- ERC0409 – *Consultation requirements for the Metrology Procedures*

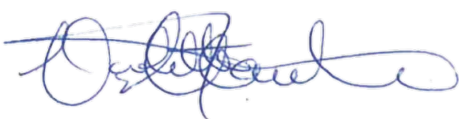
AEMO considers that the consultation paper accurately reflects the issues and implementation challenges identified in the respective rule change requests and appropriately describes the intent and scope of the proposed rule changes.

AEMO supports the consultation paper’s characterisation of the proposals as targeted refinements to the existing metering and metrology framework in Chapter 7 of the National Electricity Rules. The proposals are designed to address specific drafting limitations and operational constraints that have emerged through implementation of the current framework, while maintaining the integrity of existing metrology and settlement arrangements.

AEMO also supports the AEMC’s proposal to progress the rule change requests through an expedited rule change process. As outlined in the consultation paper, the proposed changes are narrow in scope, and are not expected to impose material costs on market participants or consumers.

AEMO looks forward to working with the AEMC and stakeholders as the consultation progresses. Should you wish to discuss any of the matters raised in this submission, please contact Hannah Heath, Group Manager – Strategic Market Reform, at hannah.heath@aemo.com.au.

Yours sincerely,



Violette Mouchaileh
Executive General Manager, Policy and Corporate Affairs