

27 March 2026

Ms Anna Collyer  
Chair, Australian Energy Market Commission  
Level 15, 60 Castlereagh St  
Sydney NSW, 2000

Reference code: ERC0413 and ERC0414

Dear Ms Collyer,

**Re: Improving metering and metrology arrangements – ERC0413 and ERC0414**

AusNet welcomes the opportunity to comment on the Australian Energy Market Commission's consultation paper on the proposed rule changes ERC0414 – Flexible communication requirements for SAPS generation connection points, ERC0413 – Refining the eligibility requirements for Secondary Settlement Points (**SSPs**), and ERC0409 – Consultation requirements for the Metrology Procedures.

AusNet supports the proposed rule changes in ERC0414, and supports, in principle, the proposed rule change in ERC0413. These are practical, targeted amendments that improve the workability of the National Electricity Rules by aligning with operational realities and the intent of recent metering reforms.

In relation to ERC0414, we support allowing type 4A meters (i.e., manual-read meters) to be used for SAPS generation connection points with a single generator connection. This change would promote more efficient outcomes for the most remote customers in remote areas with no wireless communications, where SAPS are likely to be most viable. We agree with the consultation paper in characterising that current requirement for remotely read type 4 metering can create significant challenges in remote areas where telecommunications coverage is limited or unavailable. In those circumstances, mandating remote communications can add unnecessary cost and complexity and may impede efficient SAPS deployment. The proposed amendment is a proportionate response that preserves fit-for-purpose metering while recognising the practical constraints faced in parts of the NEM.

In relation to ERC0413, we are, in principle, supportive of the proposal to replace the current list of eligible connection point metering types for SSPs with a more functional requirement based on remote acquisition capability and trading interval data. We agree this is a preferable drafting approach. It maintains the underlying policy intent of SSPs while removing an unintended barrier for premises with Victorian Advanced Metering Infrastructure (**AMI**) and other bespoke meter types. This amendment would better support nationally consistent access to SSP. However, it would need to be drafted in coordination with Victorian changes to the National Electricity (Victoria) Act 2005 orders that may have the same effect.

We appreciate the AEMC's consideration of these issues and would be pleased to discuss any aspect of this submission further.

If you have any enquiries, please do not hesitate to contact Justin Betlehem on 0433691111 or [justin.betlehem@ausnetservices.com.au](mailto:justin.betlehem@ausnetservices.com.au).

Yours sincerely,



Justin Betlehem  
Manager, Metering, Strategy & Regulation  
AusNet