

Ms Anna Collyer
Chair Australian Energy Market Commission
Via AEMC website

Dear Ms Collyer,

Improving metering and metrology arrangements Consultation Paper

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) Consultation Paper on Improving metering and metrology arrangements Consultation Paper.

PLUS ES is a registered Metering Co-ordinator (MC) and an accredited Metering Provider (MP) and Metering Data Provider (MDP) in the National Electricity Market (NEM). Our skilled workforce provides metering services across Australia and supports Consumer Energy Resources (CER) deployment. We provide metering services through Retailers and directly to customers ranging from small residential customers through to Australia's largest manufacturers and mining operators.

PLUS ES supports the AEMC's objective to improve metering and metrology arrangements to ensure a sustainable, cost-effective and equitable implementation that is beneficial for industry participants. An overview of our feedback has been provided to indicate where we have alignment on key areas of support and areas requiring further consideration:

- ERC0414, Flexible communication requirements for SAPS generation connection points
We broadly support the initiative; however note the following considerations:
 - Manual meter reading obligations should be aligned to settlement relevance and operational feasibility for remote and regional locations. Assumptions made regarding cost and practicality need to be validated; and
 - The remote communications limitations is not unique to SAPS supporting one customer. Impacts to SAPS, with similar topography should be considered irrespective of the configuration;
- ERC0413, Refining the eligibility requirements for Secondary Settlement Points (SSPs):
We support the objective of the proposed change to refine the eligibility to enable customers across the NEM, including Victoria, to benefit from SSPs and the amendment to 8D and 9D in NER Table S7.3.2.1. However, we do not support an inclusion of Class 1.5 kWh and the competency approach for Table S7.2.2;
- ERC0409, Consultation requirements for the Metrology Procedures:
We do not support the removal of the mandatory 3 month period between publication and commencement of any amendments under the Metrology Procedures. While aligning effective dates across all AEMO procedures may appear reasonable, there are important distinctions to consider:
 - Metrology Procedures establish the legal basis for measuring and settling electricity across the NEM. As a result, essential changes, even minor, may potentially have technical, market, and/or compliance impacts, and typically affect a defined subset of participants (primarily metering parties); and
 - Other AEMO procedures (and IEC documentation) are largely process driven. Changes to these generally do not affect settlement data or the traceability of measurement and tend to involve multiple stakeholders, making impacts more visible and easier to manage; and
- Rule change effective date - Supporting an appropriate rule change effective date that allows sufficient time for any associated procedural consultation and implementation activities.

Further detail and information on each of the above points can be found in the accompanying appendices.

- Appendix A – ERC0414 Flexible communication requirements for saps generation connection points
- Appendix B – ERC0413 Refine the eligibility requirements for secondary settlement points
- Appendix C – ERC0409 Reviewing consultation requirements for the metrology procedures

In addition to the detail provided above and, in the appendices, below, PLUS ES would welcome further discussions in relation to this submission or any other item relating to the consulted items.

If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Divitaris', with a long horizontal flourish extending to the right.

Andrew Divitaris

PLUS ES – Director of Metering Business Development & Strategy

APPENDIX A – ERC0414 FLEXIBLE COMMUNICATION REQUIREMENTS FOR SAPS GENERATION CONNECTION POINTS

PLUS ES supports the overarching objective of the rule change regarding remote communications particularly as they apply to Stand-Alone Power Systems (SAPS), regional and remote locations. We are concerned that several of AEMO's assumptions and assessments are not proportionate to the operational realities of regional and remote environments, and risk imposing unnecessary cost and resourcing burdens. Without corresponding changes to manual read requirements, the proposed framework risks undermining efficient, safe and sustainable SAPS metering service delivery in regional and remote Australia.

Operational Reality in Remote and SAPS Locations –

In many locations we service, reliable telecommunications infrastructure is unavailable on an enduring basis. Cellular coverage is absent or unreliable, fixed networks do not exist, and satellite solutions are often cost-prohibitive and unsuitable for continuous meter communications. These limitations are structural, rather than temporary, and cannot be resolved through commercial effort by MCs or MDPs.

AEMO's rule change appears to be based on small-scale, one-to-one SAPS arrangements. In practice, SAPS may supply multiple customers, including non-residential loads, or that fall outside proposed thresholds despite experiencing identical connectivity constraints. Treating predictable and enduring configurations through exemptions, rather than embedding them in appropriate baseline obligations, shifts complexity from rule design to ongoing administration. This increases compliance risk and drives avoidable costs for metering parties, including repeat exemption applications, legal and regulatory interpretation costs, system configuration and monitoring overheads, and additional field service planning.

For example, Metering Coordinators may be required to:

- Prepare and manage site-specific exemption requests rather than apply a standard obligation;
- Maintain parallel compliance processes for exempt and non-exempt sites;
- Fund repeated manual site visits, long-distance travel, specialist vehicles and safety controls where read frequency is unchanged; and
- Absorb weather-related or third party access delays that necessitate multiple site visits to meet prescriptive read timeframes.

These are ongoing, non-trivial costs that ultimately flow through to consumers and cannot be justified where the settlement benefit of the additional data is low.

Manual Read Obligations and Disproportionate Costs

Mandated three-monthly manual meter reading obligations in remote locations impose significant operational burden on MCs and MDPs. Manual reads often involve extended travel, specialist equipment, site-specific safety planning and access constraints that are frequently weather-dependent. In several cases, the cost of complying with mandatory read frequencies exceeds the annual value of energy settled at the site.

Assumptions that SAPS generation meters can be read during the same visit as customer meters are not supported by operational experience. Customer meters and SAPS generation meters are frequently managed by different MCs, with separate access and commercial arrangements, meaning co-reading efficiencies cannot be relied upon in regulatory design.

AEMO have also indicated the majority of data collected through frequent manual reads in SAPS settings is not settlement-critical. MRSPs and Distribution Network Service Providers (DNSP) primarily require data for settlement reconciliation, which does not depend on high-frequency reads in these configurations. Allowing flexible manual meter reading intervals, calibrated to prevent the loss of actual metering data rather than prescribing a fixed three-monthly frequency, would materially reduce cost, safety exposure and access risk without compromising settlement integrity or data quality. This approach should be enabled through agreement between the MRSP or DNSP (acting as FRMP) and the MC, allowing the costs of manual meter reads to be assessed against the benefits, and read frequencies to be set on a proportionate and outcomes-based basis.

These challenges are not limited to SAPS or residential customers. Large non-residential customers in remote areas face the same connectivity constraints for their metering remote communication connectivity. Obligations should be based on connectivity and accessibility, not customer class or technology type.

Communications Exemptions Alone Are Insufficient

While PLUS ES supports the proposal to allow exemptions from remote communications requirements where appropriate, exemptions alone do not address the primary cost driver: frequent manual meter reads. Exemptions remove one compliance requirement but leave the manual read burden unchanged. Where remote communications are not feasible, manual read obligations must also be proportionately adjusted.

Relevant Existing Obligations

Current procedures impose prescriptive manual meter reading obligations on the metering service provider.

- AEMO – Metrology Part A v 8.0, Section 12.2 Metering Data Collection states -
 - (j) For metering installations that do not have remote acquisition, and where an MC is not a TNSP, the MC must use reasonable endeavours to ensure that each metering installation is read at least every three months, and the Meter Reading frequency is agreed with the FRMP; and
- AEMO MDP Service Level Procedure v 2.5, Section 3.6 - Specific collection process requirements for Manually Read metering installations, has reiterated some of the manual read obligations on the MDP.

By contrast, the National Electricity Retail Rules (NERR), clause 20(2)¹, allows retailers to meet billing obligations with actual reads at least once every 12 months, provided metering rules are satisfied. This demonstrates there is existing regulatory precedent for more flexible, outcome-based approaches for customers².

PLUS ES Recommendation

Having regard to the issues outlined above, PLUS ES recommends that any amendments to the existing framework explicitly recognise that:

- Limitations with remote communications connectivity at regional and remote SAPS locations are structural in nature and do not vary according to the number or type of customers supplied by a SAPS generator;
- Fit-for-purpose baseline obligations should be embedded for SAPS and remote configurations, rather than relying on site-specific exemptions that increase administrative complexity and compliance risk; and
- Mandated manual meter reading frequencies should be reduced where proportionate, particularly in circumstances where:
 - Remote communications are not technically or economically feasible;
 - Settlement data requirements are low-risk, or the metering installation is not settlement-relevant; and
 - Metering data can be reliably preserved within the storage capacity of the metering installation, ensuring that actual metering data is not lost.

At a minimum, manual meter reading obligations should be aligned to settlement relevance and operational feasibility. This alignment is necessary to ensure the rule change promotes efficient, safe and sustainable outcomes for SAPS and regional and remote customers, consistent with the long-term interests of consumers.

¹ The retailer must use its best endeavours to ensure that actual readings of the meter are carried out as frequently as is required to prepare its bills consistently with the metering rules and in any event at least once every 12 months.

² Standard and market retail contracts

APPENDIX B – ERC0413 REFINE THE ELIGIBILITY REQUIREMENTS FOR SECONDARY SETTLEMENT POINTS

Enable SSPs to be established in Victoria

PLUS ES supports the proposed refinements under ERC0413 to clarify the eligibility requirements for Secondary Settlement Points (SSPs). In particular, we support amendments that provide greater certainty and enable Victorian customers to access SSP arrangements where this delivers more efficient settlement outcomes.

It is also important that the final rule drafting does not inadvertently capture remaining manually read interval meters (MRIMs) outside Victoria which are capable of remote acquisition. The eligibility framework should therefore remain clearly scoped to Victorian SSP arrangements.

Category of Registration

PLUS ES supports AEMO's proposal to amend the category identifiers for registration from 8M and 9M to 8D and 9D. This change improves consistency with other Metering Provider Data category identifiers and removes duplication with metering provider identifiers in NER Table S7.2.2.2. We consider this amendment to enhance clarity and reduce regulatory ambiguity.

Competency - NER Schedule 7 table S7.2.2.2

PLUS ES submits that Table S7.2.2.2 does not currently articulate competency requirements in a clear or appropriate manner. In particular, the table conflates Metering Provider competency with meter accuracy and performance requirements, which are addressed elsewhere in the National Electricity Rules (NER) and supporting Metrology Procedures.

The table should instead specify, for each relevant category of registration, the capability required of a Metering Provider to install and maintain metering installations compliant with the applicable NER metering installation type, including the units of measurement for which the Metering Provider must be competent.

References to meter accuracy classes should be removed from Table S7.2.2.2. Accuracy class and performance requirements are already defined through clauses S7.4 and S7.5 of the NER and are further supported by the Metrology Procedures and the Australian Standards referenced therein. Retaining accuracy class references in Table S7.2.2.2 duplicates these existing obligations and introduces the potential for confusion between equipment performance requirements and Metering Provider competency requirements.

To reflect differences in competency requirements between Type 8A and Type 8B metering installations, PLUS ES submits that distinct registration categories should be adopted rather than combining these installation types under a single competency description. This would provide greater clarity and regulatory consistency by aligning competency requirements directly to the scope of work the Metering Provider is permitted to undertake.

Under this approach:

- Competency descriptions would focus on the ability to install and maintain metering installations compliant with the relevant NER metering installation type and applicable measurement quantities (e.g. kWh, kvarh); and
- The table would avoid restating accuracy or uncertainty requirements that are already prescribed elsewhere in the Rules and Metrology framework.

By way of example, Table S7.2.2.2 could be revised as follows:

Illustrative approach only

- 8M - Ability to install and maintain metering installations compliant with Type 8A and Type 8B requirements for kWh and kvarh measurement;
- 8B - Ability to install and maintain metering installations compliant with Type 8B requirements for kWh measurement only; and
- 9M - Ability to install and maintain electricity metering installations compliant with Type 9 requirements for kWh and kvarh measurement.

This principles-based approach should also be applied consistently across the remainder of Table S7.2.2.2 and other similar tables in clause S7.2.2.

PLUS ES also notes that the attempted reference to a 'Class 1.5 kWh' meter is incorrect. Current Australian Standards, including those referenced in Metrology Procedure Part A, do not recognise a 'Class 1.5' category for kWh meters. The closest historical reference is the obsolete AS 1284.1 Standard that references a 'General Purpose' accuracy band (error band of 1.5%). This Standard is for electromechanical meters and is not relevant to modern Type 8 and Type 9 metering installations.

The NER already define the required performance characteristics and accuracy outcomes of metering installation types (including Types 8 and 9) through clauses S7.4 and S7.5, supported by Metrology Procedure Part A and the referenced Australian Standards applicable to meters, current transformers and voltage transformers. These equipment performance requirements should not be conflated with, or replicated within, the competency requirements of the Metering Provider, which serve a distinct regulatory purpose.

APPENDIX C – ERC0409 REVIEWING CONSULTATION REQUIREMENTS FOR THE METROLOGY PROCEDURES

PLUS ES does not support the proposed removal of the three-month implementation buffer for amendments to the Metrology Procedures.

While PLUS ES acknowledges AEMO's objective of aligning effective dates across its procedural instruments, this approach does not adequately recognise the distinct role and regulatory function of the Metrology Procedures compared to other AEMO procedures.

Distinction Between Metrology Procedures and Other AEMO Procedures

The Metrology Procedures establish the legal and technical basis for the measurement and settlement of electricity across the National Electricity Market. Even changes characterised as minor may have material implications for settlement accuracy, traceability of measurement, compliance obligations, and the systems and processes of a defined subset of participants—primarily Metering Coordinators, Metering Data Providers and associated service providers.

By contrast, many other AEMO procedures and Information Exchange Committee documents are largely process-driven and operational in nature. Amendments to these instruments typically do not alter settlement data or measurement outcomes and tend to involve a broader group of stakeholders, making impacts more visible and more readily absorbed through business-as-usual change management.

These differences justify distinct approaches to implementation timing.

Lack of Demonstrated Market Benefit

To date, AEMO has not substantiated the proposed change with clear examples demonstrating that the removal of the three-month buffer would have delivered material efficiency gains to the market without adverse impacts on affected participants. In the absence of such evidence, PLUS ES considers the proposal disproportionate to the risks associated with changes to settlement-critical instruments.

Existing Procedural Safeguards Are Sufficient

The NER already provide multiple consultation and change pathways for AEMO procedures, including minor, expedited and full consultation processes. These pathways are well-understood by industry and appropriately calibrated to the materiality of change.

Where changes are genuinely minor, existing procedures already enable timely implementation. Where changes are essential or time-critical, PLUS ES does not consider it appropriate that Metering Service Providers be required to advocate for a minimum implementation period. Essential changes will, by their nature, require system changes and/or business process updates, and implementation timelines should continue to reflect the practical realities of delivery and compliance.

Conversely, where a change is more than minor, existing NER and procedural requirements already necessitate appropriate consultation, implementation periods, and change management obligations for affected metering parties. In this context, the current three-month buffer provides a clear and predictable baseline that supports compliance certainty without preventing expedited action where justified.

Conclusion

PLUS ES therefore submits that the current framework already provides sufficient flexibility to manage the qualifications identified by AEMO, while maintaining appropriate safeguards for settlement integrity and participant compliance. The removal of the three-month implementation buffer for Metrology Procedures introduces unnecessary risk without demonstrated market benefit and should not be progressed.