

26 March 2026

Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney, NSW 2000

Ref: ERC0414, ERC0413 and ERC0409

Submission on Improving metering and metrology arrangements:

**Flexible communication requirements for SAPS generation connection points,
Refining the eligibility requirements for Secondary Settlement Points,
Consultation requirements for the Metrology Procedures - Consultation Paper**

Introduction

1. Bluecurrent welcomes the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on the consultation paper on *Improving metering and metrology arrangements*, dated 26 February 2026.
2. This submission draws on Bluecurrent's experience operating within the National Electricity Market (NEM), including dealing with metering, settlement, and retail electricity market procedures under Chapter 7 of the *National Electricity Rules* (NER).
3. Bluecurrent is generally supportive of the three rule change proposals submitted by the Australian Energy Market Operator (AEMO). We consider the proposals to be targeted in scope, low risk, and directed at addressing identifiable inefficiencies and unintended outcomes in the current regulatory framework.
4. This submission does not respond to each consultation question individually. Instead, it focuses on key assumptions underpinning the rule change proposals, focussing on ERC0409 – *Consultation requirements for the Metrology Procedures*.

General position on the rule change proposals

5. Bluecurrent supports ERC0414 – *Flexible communication requirements for SAPS generation connection points*. The proposal appropriately recognises the disproportionate costs associated with remote telecommunications in rural and remote locations and the limited role that generation metering data plays in settlement for standalone power systems (SAPS) with a single generation source.
6. Bluecurrent also supports ERC0413 – *Refining the eligibility requirements for Secondary Settlement Points*, particularly the move to outcomes-focused drafting that removes an unintended exclusion of Victorian customers and better aligns the NER with the policy intent of the *Unlocking CER Benefits through Flexible Trading* reforms.
7. In our view, both proposals reduce unnecessary barriers and improve equity across jurisdictions without undermining settlement integrity, market transparency, or consumer protections.

Comments on ERC0409 – Consultation requirements for the Metrology Procedures

8. Bluecurrent supports the objective of ERC0409 to improve regulatory flexibility and responsiveness. However, we consider that the problem definition and justification advanced by AEMO overstate the extent to which the regulated minimum notice period constrains implementation of metrology changes.

Nature and complexity of metrology change

9. The Metrology Procedures now comprise multiple, distinct procedural components, including:
 - physical metrology requirements relating to the installation, inspection, testing and maintenance of metering assets;

- operational and compliance obligations affecting field practices, assurance frameworks and audit processes; and
 - back-office estimation and validation algorithms embedded within Meter Data Management Systems.
10. Changes in these areas impact field work and the operational and management of meters (those already deployed and those to be deployed in the future), and frequently require system design, software development, testing, accreditation updates and coordinated deployment across multiple service providers. For such changes, implementation timeframes routinely exceed three months, irrespective of any regulated minimum notice period.
11. We believe that the minimum three-month requirement is not, in practice, the binding constraint on implementation. Rather, timeframes are driven by technical complexity, operational risks, and the need for robust assurance.

Consistency with other Chapter 7 procedures

12. AEMO argues that the Metrology Procedures are anomalous relative to other Chapter 7 procedures that do not include a mandatory commencement delay.
13. We do not consider this differentiation to be inherently problematic. Metrology Procedures directly affect regulated physical assets, participant accreditation scopes, compliance obligations, and settlement-critical data validation.
14. In this context, the existence of a longer regulated notice period reflects a proportionate response to higher-consequence risk, rather than an inefficiency arising from inconsistent drafting.

Role of AEMO consultation discretion

15. AEMO notes that it already consults on commencement timing and considers participant readiness when amending procedures. We do not recall an instant where the regulated minimum notice period has prevented the appropriate implementation outcomes.

Ministerial request cited by AEMO

16. AEMO cites a recent ministerial request that could not be implemented within the requested timeframe due to the minimum notice period. Although Bluecurrent was not directly affected by this change, we understand that those parties that were impacted challenged AEMO's proposed solution requiring fleet-wide updates within the minimum timeframe¹. This demonstrated that it was operational considerations and not the regulated minimum timeframes that was the constraint.
17. Bluecurrent does not consider this to be a strong general justification for permanent rule change. Ministerial urgency does not alter the technical and operational requirements associated with metrology changes.
18. Circumstances that require minor administrative change can be addressed through existing mechanisms, including minor consultation pathways or bespoke transitional arrangements, without removing a standing safeguard designed to manage ongoing implementation risk.

¹ https://www.aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2024/removal-of-controlled-load-profile-nsw/submissions/ausgrid.pdf?rev=03f379f142ea4f8d9d2211c994c2819a&sc_lang=en

Overall assessment of ERC0409

19. In summary, while Bluecurrent does not oppose the removal of the minimum notice period in principle, we consider that:

- Its removal is unlikely to materially accelerate implementation of substantive metrology changes.
- Its presence provides clarity and risk signalling in a high-consequence regulatory domain.
- Care should be taken to avoid creating an implicit expectation of compressed implementation timelines where this would increase operational, compliance or settlement risk.

Concluding comments

20. Bluecurrent supports all three rule change proposals and agrees they are suitable for expedited consideration.

21. In relation to ERC0409, we support the intent to enhance flexibility but note that implementation timeframes for metrology changes are driven primarily by complexity rather than prescribed notice periods. It is important that any removal of the minimum notice period does not result in unrealistic expectations regarding implementation speed or weaken existing risk management disciplines.

22. We would welcome the opportunity to discuss any aspects of this submission with the AEMC.

23. This submission does not contain confidential information, and Bluecurrent is comfortable for it to be published in full.

Yours sincerely



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