

# Submission to the AEMC on Consultation requirements for the Metrology Procedures (ERC0409)

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Intellihub welcomes the opportunity to provide feedback on the AEMC's consultation paper on Consultation requirements for the Metrology Procedures (ERC0409).

Intellihub is an Australian and New Zealand based digital energy management specialist that is simplifying the transition to sustainable energy through our holistic ecosystem of smart devices and services. We deliver innovative metering, data and behind the meter solutions that maximise digital and new energy services. We are an experienced and leading provider of multi-utility services across electricity and water networks for residential, commercial & industrial, embedded network and solar metering customers. We specialise in asset management, installation, financing, and the day-to-day operations of smart meters, managing more than 3 million advanced smart meters.

Intellihub is registered as a Metering Coordinator, Metering Provider and Metering Data Provider in the Australian National Electricity Market and operate under participant names of Action, Acumen, Intellihub, Powermetric and Spotless.

**We suggest the 3-month minimum period be removed for the expedited consultation process and be maintained for the standard consultation process**

AEMO is proposing to delete clause 7.16.3(b) from the NER which effectively will remove a 3-month minimum period between the final determination on changes to the metrology procedure and when the changes become effective and allow AEMO to make the effective start date as early as the date when the final determination is published. AEMO contends that the 3-month minimum period creates unnecessary delays, reduces flexibility and responsiveness to changes in the electricity market.

Whilst we agree with AEMO about having flexibility to be responsive to changes we also believe the effective start date needs to be balanced with the time required for impacted market participants to make any necessary changes.

We note the NER recognises three types of consultation processes: standard, expedited and minor. Currently the 3-month minimum period is not applicable for the minor consultation process, therefore AEMO's rule change request is more applicable to the expedited and standard consultation process.

The expedited consultation process can only be used for a Non-material Proposal with this term defined in section 8.9 of the NER as 'a Proposal that, if implemented, will be unlikely to have a significant effect on the NEM or on the activities of the Registered Participants to which the Proposal relates'. We agree that the 3-month minimum period can be removed for the expedited consultation process since it can only be used when the proposed change is unlikely to have a significant effect on the NEM or market participants.

By definition, the standard consultation process must be used when the change is likely to have a significant effect on the NEM or market participants. We believe for the standard consultation process the 3-month minimum period is appropriate because this provides a minimum time period for impacted market participants to make any necessary changes.

We agree with AEMO's understanding that the 3-month minimum period is intended to safeguard market operations by allowing a transition period for participants to adapt to new requirements<sup>1</sup>

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<sup>1</sup> AEMO's rule change request on Metrology Procedures consultation process requirements, page 6

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however we disagree with AEMO that the 3-month minimum period no longer ‘... offer value in safeguarding market operations as might have originally been envisaged’. Metrology requirements are continually evolving and becoming more complex, for example in addition to providing metering data services to support market settlement and retailer billing, and services as defined in the minimum services specification there are now additional requirements to provide basic power quality data services and real time data services from the same hardware. This means new or amendments to metrology requirements will need a reasonable amount of time for market participants to assess the impact of AEMO’s final determination then design, test and roll out the necessary changes. We believe the 3-month minimum period is an appropriate safeguard, and is relatively conservative, given the growing complexity of metrology requirements and most changes require 12 months or more to implement.

From our experience any change that had a significant effect on the NEM or market participants required more than 3 months to implement therefore we do not see the 3-month minimum period to be a hindrance for the standard consultation process. Should there be a scenario where all impacted market participants agree to an earlier effective date than 3 months, noting it is unlikely when there are significant impacts, then we suggest AEMO utilise the expedited consultation process, which also allows for a shorter consultation period.

Accordingly, we suggest clause 7.16.3(b) be amended as follows (blue text indicates the amendment):

If AEMO amends the *metrology procedure*, there must be a minimum period of 3 months between the date AEMO publishes the amended *metrology procedure* and the date it commences, unless the change is made using the [expedited rules consultation procedure or minor rules consultation procedure](#) in which case the effective date may be the date of *publication*.

### **We suggest a clarification for jurisdictional metrology material in the metrology procedure**

AEMO highlighted a recent example where the 3-month minimum period prevented AEMO from completing the task in the timeframes requested by the Minister. Clause 7.16.4 of the NER is applicable for this example and we understand that AEMO must be afforded sufficient time to undertake the necessary consultation process and also factor in the known 3-month minimum period. We believe to avoid any doubt this should be clarified by amending clause 7.16.4(c)(2) as follows (blue text indicates the amendment):

be provided to AEMO within sufficient time for AEMO to meet its obligations under this clause 7.16.4 [and 7.16.3](#);

We would be happy to provide more detail on matters raised in this submission. If you have any questions please contact Dino Ou, Industry Development Lead on [dino.ou@intellihub.com.au](mailto:dino.ou@intellihub.com.au) or 02 8303 4033.

Regards,



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