



# **Electricity Rule Change Proposal**

**Non-market participant services and retail notices**



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## ABOUT PLUS ES

**Our Vision.** We are building and operating the infrastructure that underpins Australia's clean energy transition. From advanced metering and distributed energy services to EV charging, grid connections, and large-scale storage, we deliver innovative, reliable, and high-performance solutions. Our integrated capabilities and proven credentials ensure customers benefit from safe, scalable, and future-ready infrastructure that drives electrification and long-term sustainability.

### What we do?

PLUS ES is a nationally recognised provider of specialist electrical and infrastructure solutions. We work at the intersection of power networks, transport, and energy technology, delivering projects across:

- **Metering Services:** Advanced metering for residential, commercial, and industrial customers, including sub-metering, dynamic load management, and data insight services.
- **Energy Infrastructure:** Provides services to design, build, own and operate electrical infrastructure including battery storage and electric vehicle charging and electrical substation infrastructure.
- **Telco Infrastructure:** Design, build, own, and operate telecommunications infrastructure including small cells, macro towers, dark fibre, and wireless solutions.
- **High Voltage Services:** We specialise in comprehensive High Voltage (HV) metering solutions, including precision testing and reporting of Current Transformers (CT) and Voltage Transformers (VT), as well as the installation and ongoing maintenance of HV metering systems and their communications infrastructure.

### Metering Credentials

PLUS ES is one of Australia's most experienced and accredited metering providers, with unmatched scale and credentials across the full lifecycle of metering services. Our proven capability spans design, deployment, operations, and data services for residential, commercial, and government customers.

- Managing over 1.7 million meters nationally across the NEM, including 13,000+ NSW Government meters at critical infrastructure sites such as hospitals, schools, and utilities.
- Installed 320,000+ smart meters in FY25, leveraging NSW's largest accredited ASP and FSP workforce for large-scale rollouts.
- Accredited by AEMO as Metering Coordinator (MC), Metering Provider (MPB), Metering Data Provider (MDP), and Embedded Network Manager (ENM).
- Delivering high-quality, NEM12-compliant data at 5, 15, and 30-minute intervals, validated through advanced Business Process Exception Management (BPEM) and assurance systems.
- National Compliance & Training Team of 13 specialists with 300+ years' collective experience ensuring safety, governance, and compliance across all metering operations.

## 1. SUMMARY

PLUS ES proposes an amendment to the National Electricity Retail Rules (NERR), Clause 59A, to clarify the retailer's obligations in providing a retail notice for smart metering installations when the customer has engaged a non-market participant such as Accredited Service Provider (ASP) in NSW and appropriately accredited electricians in other states as per jurisdictional requirements.

Subject to jurisdictional regulations a customer can engage a qualified person to arrange a supply interruption at their premises for electrical work to be safely performed. Where a customer arranges a supply interruption to their premises then the obligations of the retailer and the distributor in relation to notifications for supply interruptions are not applicable because the supply interruption was not arranged by the retailer or distributor. Accordingly, the customer and the qualified person may mutually agree on the preferred date and time for the supply interruption and any associated electrical work to be performed without requiring an advance notice from the retailer or distributor.

PLUS ES' proposal seeks to exempt the retailer from the current obligations of NERR clause 59A(2)(a) and (b) for metering installations performed under a non-market service contract and is customer initiated. We also propose changes to NERR clause 59A(4) to ensure the customer receives the retailer notice for metering replacements, by requiring the retailer to issue a notice within 5 business days following the metering replacement.

The current rules do not make allowances where the customer has engaged directly with a non-market participant for electrical service work at their premises. Retailers' varied approaches to complying with NERR clauses 59A(2) and 59A(4) are commercially impacting these participants by creating scheduling and resource challenges, as well as customer frustration due to delays and rescheduling of agreed works.

These changes aim to reduce delays, improve customer experience, and enhance operational efficiency while maintaining compliance and transparency in the metering process.

PLUS ES undertook the following stakeholder engagements to test, quantify, and qualify the impacts of the proposed changes and to seek feedback. None of the stakeholders engaged raised concerns with the proposal:

- Contestable Metering Providers (MPs): discussions were held and the draft proposal was provided for review.
- Accredited Service Providers (ASPs): verbal discussions were conducted to understand impacts on their operations and customers since the Retail Notice requirement commenced in mid-2025.
- A select range of retailers: engaged through discussions and/or review of the draft proposal.

## 2. BACKGROUND

On 1 December 2017, the Power of Choice initiative came into effect, significantly transforming the landscape for small customer metering. Under this reform, all small customer metering installations in New South Wales (NSW), South Australia (SA), Queensland (QLD), the Australian Capital Territory (ACT), and Tasmania (TAS) were required to comply with the minimum service specifications outlined in National Electricity Rules (NER) Schedule 7.5. The Rules also introduced contestability for small customer metering, enabling Retailers to enter commercial arrangements with a MC, who in turn engages MP/s and other service providers to deliver metering services.

While the MC and MP hold regulatory and market responsibilities for the metering asset, installations must be performed by electricians with appropriate national and jurisdictional accreditations. These electrical contractors may operate as field resources for the MP or as independent service providers.

Metering installations are initiated under the following circumstances:

- New meter deployments – Initiated by the retailer and carried out by the MC’s appointed MP. These deployments may include:
  - The regulated Legacy Metering Replacement Plan (LMRP) under the NER, requiring Retailers to replace legacy meters in accordance with the LMRP developed by the Distribution Network Service Provider (DNSP); and
  - Retailer-led programs in addition to the LMRP to install new meters;
- Metering faults or malfunctions – Regardless of the existing metering type, replacement is required when a meter is defective or fails compliance testing. These service requests are typically driven by the retailer and their MC; and
- Customer-initiated requests – Two common triggers include:
  - Customers contacting their retailer to request a smart meter installation, often linked to new connections, upgrades, or the addition of Consumer Energy Resources (CER) such as solar, batteries, etc. In these cases, the retailer engages the MC’s appointed MP; or
  - Customers directly engaging authorised, accredited non-market participants (e.g. ASPs, electrical contractors) to quote and perform electrical works, which may include a metering installation. The customer negotiates price and timing directly with the contractor, with the retailer informed to complete the market processes and trigger system updates.

The NSW ASP scheme, for example, enables customers to engage an ASP directly to perform supply service works on their property, which may include a meter installation<sup>1</sup>. These services and costs are directly negotiated between the customer and the ASP.

The customer’s benefits from ASP services are:

- The ability to choose an ASP Level 2 provider instead of relying solely on their DNSP;
- Reduced complexity in coordinating multiple parties for meter installation; and
- Fewer supply outages during the process, as the ASP can complete the electrical supply works, often linked to LNSP works, and a metering installation during the same outage.

The customer may also be a strata/body corporation managing the administration and maintenance of common property in a multi-owner building or complex, ensuring compliance with regulations and facilitating shared responsibilities among owners. For example, a stratum may engage an electrical contractor to replace the electrical

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<sup>1</sup> ASP have different levels of accreditation; A level 2D accreditation is required for metering installations along with the appropriate MP accreditations, including minimum training requirements.

switchboard which may require replacement of metering installations to comply with regulations.

### 3. STATEMENT OF ISSUE

On 28 November 2024, the AEMC introduced rule changes to support Accelerated Smart Meter Deployment (ASMD), including a requirement for retailers to provide a retail notice for all Type 4 and Type 4A smart meter installations (except new connections). This obligation took effect on 1 June 2025.

Under NERR clause 59A(2), when a Type 4 or Type 4A meter is to be installed, the retailer must:

- Provide the customer with a notice no earlier than 60 business days and no later than 4 business days before the proposed installation date; or
- Obtain the customer's Explicit Informed Consent (EIC) for the installation to occur within a 5-business-day date range or on a specified date.  
Where EIC has been obtained, the retailer must issue the notice within 5 business days after the meter is replaced.

This subrule is classified as a Tier 2 civil penalty provision.

Due to limited clarification in the Rules and the ASMD Final Report, retailers have applied this requirement to all installations, including those initiated by customers through accredited electrical contractors. To comply, some retailers require customers to provide EIC acknowledging that the retail notice may be issued after installation. This has led to practices such as requiring customers to call the retailer or delaying market activities (e.g., MC nomination or service order release) until EIC is confirmed.

In extreme cases, retailers have proposed measures such as bypassing meters or leaving premises off supply—actions disproportionate to the intent of the retail notice requirement for customer-initiated works. These practices cause unnecessary delays, repeated outages, and customer frustration, undermining efficiencies when customers engage contractors for broader electrical works<sup>2</sup>. Key impacts include:

- Rescheduling agreed dates when EIC cannot be obtained in time;
- Additional customer interactions, such as signing separate EIC forms or calling the Retailer;
- Loss of contractor productivity due to restricted scheduling flexibility (e.g., electricians cannot fill gaps with opportunistic jobs);
- Customer frustration and aggressive behaviour from delays or multiple outages;
- Increased costs to serve when contractors require a second visit to complete installation; and
- Financial pressure on ASPs due to strata contracts that delay payment until all works, including smart meter installations, are completed.

### 4. PROPOSED RULE CHANGE

To address the unintended consequences outlined in Section 3, PLUS ES proposes amendments to NERR clause 59A to remove the requirement for retailers to provide a retail notice prior to the metering installation or gain EIC where the meter replacement is customer-initiated and performed by a non-market participant.

The proposed subclause clarifies the distinction between retailer-initiated and customer-initiated services and sets out the retail notice obligations accordingly.

Proposed new sub clause for NERR 59A(2)(c):

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<sup>2</sup> Bilateral agreements between market participants allow scheduling compliance for retailer initiated requests.

(c) A retailer is not required to comply with clause 59A(2)(a) or 59A(2)(b), where the meter replacement:

- (i) is initiated at the customer's request; and
- (ii) performed under a non-market participant service agreement; and in which case, subrule (4) applies.

The retail notice obligation should remain, requiring retailers to issue the notice within five business days of becoming aware of the installation.<sup>3</sup> We propose the following amendment to NERR clause 59A(4):

(4) Where **subrules (2)(b) or (2)(c) apply: a retailer has obtained a small customer's explicit informed consent in accordance with subrule 2(b):**

- (a) the retailer must issue a notice within 5 business days after **being made aware that the meter** is replaced, or the *new meter deployment* is undertaken; and
- (b) that notice must include the information in subrule (3), with the exception of subrules (3)(b) and (3)(i).

An alternative option considered was to fully exempt retailers from issuing any Retailer Notices for these customer-initiated metering installations. However, we consider that retaining the post-installation Retailer Notice provides meaningful value to customers by ensuring they receive timely and transparent information about changes to their metering installation or retail products. While issuing this notice does impose a small administrative cost, currently incurred, the consumer benefits of clarity, transparency, and consistent communication are assessed to outweigh this cost, making the post-installation notice an appropriate and proportionate obligation.

## 5. BENEFITS AND IMPACT ASSESSMENT

### BENEFITS

- **Improved Customer Experience**
  - Customers who engage accredited non-market participants (e.g., ASPs) will experience fewer delays and rescheduling issues; and
  - Greater flexibility and choice for customers in managing electrical works and metering installations.
- **Operational Efficiency**
  - Eliminates duplicate coordination processes between retailers and non-market participants; and
  - Reduces administrative burden on retailers by removing unnecessary EIC steps for customer-initiated installations.
- **Alignment with Policy Objectives**
  - Supports the intent of the Power of Choice reforms by promoting competition and customer empowerment; and
  - Maintains transparency through post-installation retail notice obligations.
- **Market Integrity**
  - Ensures timely updates to market systems following meter replacement; and
  - Preserves accountability for accredited participants under jurisdictional schemes.

### IMPACT ASSESSMENT

- **Retailers**
  - Reduced compliance complexity and operational costs - The current application of

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<sup>3</sup> Due to the engagement nature of the works, the notice-based obligation should start from the point a party becomes aware of the action, not from when the action occurs. This keeps obligations practical and enforceable.

NERR 59A requires retailers to undertake unnecessary administrative steps—such as obtaining EIC for customer-initiated work, holding service orders, and managing duplicate customer interactions—which increases back-office workload, call-centre time, and exception handling activities. Removing these steps reduces processing costs, streamlines workflow for service order release, and lowers internal labour expenditure; and

- Continued responsibility for issuing retail notices post-installation and updating market systems.
- **Customers**
  - Faster service delivery and improved satisfaction - Customers avoid delays associated with EIC processes and retailer scheduling constraints, which can otherwise result in extended outages, rescheduled contractor visits, or prolonged periods without upgraded services. Faster completion reduces out of pocket and opportunity costs—such as time off work, extended site access arrangements, or paying contractors for additional attendance; and
  - Ability to negotiate timeframes directly with accredited providers for bundled electrical works - Customers can package metering installations with switchboard upgrades or CER-related electrical works in a single outage. This lowers total job costs by eliminating duplicate call-outs, reducing total outage windows, and improving contractor efficiency.
- **Non-Market Participants (ASPs/Electricians)**
  - Greater certainty in scheduling and reduced risk of delays caused by retailer-driven processes - Under current arrangements, ASPs often face cancellations because retailers cannot issue notices or obtain EIC within required timeframes. This leads to unproductive travel, idle labour hours, and re-visits—costs borne by contractors or passed on to customers. The proposed change eliminates these inefficiencies and stabilises workflow; and
  - Reduced cost to serve by driving operational efficiencies - Contractors avoid performing repeated site visits, avoid duplicated arrangements with retailers, and maintain predictable daily scheduling. This results in lower overheads, improved utilisation of field staff, and better capacity to respond to customer demand, lowering total business operating costs.
- **Market Participants (MCs/MPs)**
  - No adverse impact; existing obligations remain unchanged for installations coordinated through market participants.
  - Greater clarity reduces the administrative burden in supporting non-market participants where metering installations are involved - MPs are frequently required to assist in navigating retailer requirements for customer-initiated work, including additional data clarifications, scheduling adjustments, and supporting EIC compliance. Removing unnecessary retailer-driven notice requirements reduces MP administrative overhead and time spent coordinating avoidable exceptions.
- **Regulatory Framework**
  - Minimal rule change with significant practical benefits; and
  - No impact on safety and an increase of technical compliance, as jurisdictional accreditation requirements remain in place.

## 6. HOW THE PROPOSED RULE CONTRIBUTES TO THE NEO AND THE NERO

### 6.1 CONTRIBUTION TO THE NATIONAL ELECTRICITY RETAIL OBJECTIVE (NERO)

PLUS ES considers the proposed rule change promotes the long-term interests of consumers with respect to price, quality, reliability, and customer experience by:

- **Improving service delivery and reducing customer disruption**  
The change eliminates unnecessary delays, repeated outages, and rescheduling that arise when retailers apply notice requirements to customer-initiated work.
- **Reducing administrative and operational costs**  
Retailers will no longer be required to obtain EIC, issue pre-installation notices for installations they do not schedule or explain the regulations and the downstream impacts to customer works. This reduces cost-to-serve and supports efficient service delivery.
- **Supporting Power of Choice and consumer empowerment**  
Customers retain the ability to engage accredited contractors for integrated electrical works without retailer-driven delays—strengthening competition and choice.
- **Maintaining transparency**  
Retailers continue to issue post-installation notices, ensuring consumers remain informed without imposing unnecessary process burdens.

## 6.2 CONTRIBUTION TO THE NATIONAL ELECTRICITY OBJECTIVE(NEO)

The NEO is referenced alongside the NERO because, although the proposed amendments are to the retail rules, the changes go beyond retail customer communications and directly influence the efficiency, coordination, and delivery of metering services across the electricity system, related market processes, and other affected operational functions governed under the NER.

PLUS ES considers the proposed rule change promotes the efficient operation, use, and investment in electricity services by:

- **Reducing inefficiencies and improving workforce utilisation**  
The current wording of the Rule causes repeated site visits wasted labour time, and duplicated coordination. The proposed exemption directly addresses these inefficiencies.
- **Lowering market wide operational costs**  
Streamlined processes reduce administrative overhead for retailers, Metering Providers, and non-market participants. These savings contribute to lower long-term costs for consumers.
- **Supporting a competitive and innovative metering services environment**  
Customers are better able to engage ASPs/electricians for bundled work (e.g., switchboard upgrades and metering) in a single outage, enhancing service efficiency and market competition.
- **Maintaining safety, reliability and market integrity**  
The proposal does not alter technical or safety obligations. Jurisdictional accreditation (e.g., ASP scheme) remains in full effect, and retailers retain responsibility for market updates and post-installation notices.

## 6.3 DO THE PROPOSED CHANGES MEET THE CONSUMER PROTECTION TEST?

PLUS ES considers the proposed changes meet the consumer protection test because they remove unintended harms created by the current application of NERR 59A to customer-initiated metering work—such as delays, repeated outages, administrative obstacles, and customer frustration—while fully retaining essential protections, including safety requirements, jurisdictional accreditation controls, and post-installation retail notice obligations.

By eliminating unnecessary pre-installation notices and EIC steps for work not scheduled by the retailer, the amendments reduce avoidable costs, support customer choice and flexibility consistent with Power of Choice reforms, and improve the timeliness and quality of service delivery, thereby enhancing rather than diminishing consumer protections.