Landis+Gyr wishes to thank AEMC for the opportunity to respond to its draft determination entitled "Unlocking CER Benefits".

Our submission includes a general response to AEMC's draft determination. First, we have included a short background to Landis+Gyr.

Background to Landis+Gyr

Landis+Gyr is the global industry leader in energy measurement solutions and advanced meter management for electricity, gas, heat and water utilities. Focused on quality, reliability and innovation, Landis+Gyr offers a portfolio of energy meter solutions, network monitoring devices, Level 2 EVSEs and associated management platforms, all of which enables utilities and end-users to use scarce resources efficiently, save operating costs and protect the environment by managing energy better.

General Response to "Unlocking CER Benefits"

Landis+Gyr broadly supports AEMC's draft determination and associated rule changes. The AEMC has presented a series of changes that we believe will be successful in enabling both small and large customers to participate more easily in flexibility arrangements and for market participants to create commercial proposals.

As a manufacturer and supplier of metering solutions as well as devices that operate behind the meter, namely Level 2 EVSEs, Landis+Gyr eagerly anticipates playing an important role in providing the means for the market to achieve the desired outcomes.

In order to participate in this role, Landis+Gyr along with other suppliers, is likely to enter into product development specifically related to Type 8 and 9 metering. We note that the minimum requirements for Type 8 and 9 metering are still to be defined in the NER. In addition, and as noted by AEMC in the draft determination, NMI is concurrently conducting market consultation on the pattern approval of the measurements at the output of EVSEs. Accordingly, the market is moving towards a likely expectation for EVSEs installed in public locations to have two onboard pattern approved meters, one for the energy taken from the network and a second for energy delivered to the customer, neither of which is yet to be fully defined. Landis+Gyr respectfully questions whether the complexity and cost of two onboard pattern approved meters is in the best interest of the market and consumers, or whether AEMC may wish to investigate an alternative approach. As an example of an alternative approach, it may be feasible for Level 2 EVSEs to have their self-consumption defined as part of the pattern approval, similar to electricity meters.

Landis+Gyr would support a next step of finalising the minimum requirements for Type 8 and 9 metering as well as a further review into alternative approaches. We submit that this work should be completed carefully and shared with industry stakeholders prior to setting a date for adoption.

It is Landis+Gyr's position that the proposed adoption date of February 2026 is likely to be too soon for manufacturers to be ready with compliant product, even if the requirements were already fully defined. Landis+Gyr understands that the new Type 8 and 9 metering arrangements will be voluntary. However, we also submit that providing suppliers with sufficient time to make product changes is likely to be beneficial to the market, as a greater number of offerings will be ready. Introducing the new metering arrangements too rapidly may lead to a misalignment between market expectations and product readiness. It could also

reduce equality amongst vendors, creating an advantage for those with greater size, financial strength or by chance how easily their products are able to be adapted to the new requirements.

Landis+Gyr's view is that 24 months after the finalisation of the Type 8 and 9 metering requirements would be suitable as a phase-in date. Based on our extensive experience in development of metering equipment, Landis+Gyr submits that to implement new metering requirements into EVSEs would require significant changes to most existing products in the market. In order to execute on these changes would require thorough planning prior to a development phase and testing phase, followed by third party testing. Any parts of the specification that are not met during the testing phase would need re-design.

Landis+Gyr would be pleased to assist in further consultation with AEMC, NMI and other stakeholders.