30 May 2024

GPO Box 2603
Sydney South NSW 2001

Submitted via AEMC website.

Dear Julia and team,

ERC0378 – Accelerating Smart Meter Deployment Draft Rule

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (**AEMC**) Draft Rule Determination - Accelerating Smart Meter Deployment Draft Rule – ERC0378.

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 and infrastructure within the energy landscape. Our customers range from small residential customers through to Australia's largest manufacturers and mining operators.

PLUS ES's key recommendations are:

- **Accelerating the smart meter deployment of smart meters across the NEM** - we support the acceleration program and the associated deployment target years 2025-2030, including the Legacy Meter Replacement Plan (**LMRP**) reforms which will help accelerate the deployment volume of smart meters across Australia. The legacy metering retirement approach by the Local Network Service Provider (**LNSP**) will achieve stakeholder buy in and deliver the most efficient deployment.
- **Enabling better access to Power Quality Data (PQD) -** we agree that the data recorded by the smart meter is essential to unlocking further benefits for customers and participants. Additionally, competitive market forces and bilateral negotiations will deliver the most equitable and efficient outcomes. Following the AEMC's Metering Review final determination for LNSPs to access Basic PQD for no direct cost to them, the Rules must ensure:
    - The effective date for Basic PQD to be amended to allow industry an additional twelve months from the proposed date 26 June 2025, to consult and implement a robust solution;
    - There is a clear definition of Basic PQD as previously analysed and agreed with industry during the Metering Review;
    - Basic PQD will apply to eligible metering points with enabled remote communications and technically capable of delivering the requirements;

- Other market participants, third parties and customer agents are not eligible for no direct cost access to PQD;
- The MC/metering party is enabled to establish commercial arrangements, terms and conditions including price, with LNSPs to deliver PQD and services in addition to the regulated Basic set; and
- The MC/metering party is enabled to establish commercial arrangements, terms and conditions including price, with other requesting parties such as market participants, third parties and customer agents with respect to PQD and services.

- **Reducing barriers to installing smart meters and improving industry co-ordination** - we support the initiative to reduce barriers, which create operational inefficiencies in the installation of a smart meter and have included some additional points for the AEMC's consideration within the body of this submission.
- **Improving the customer experience in metering upgrades** - we recognise that the consumer plays an integral role in achieving the targets and reforms of the Post 2025 Market design. It is important that the customer not only agrees to have a smart meter installed but is also educated on the benefits of this metering technology compared to the mechanical meters.
- **Proposed Effective Dates** - PLUS ES supports that some of the proposed effective dates for National Electricity Rules (**NER**) and National Retail Rules (**NERR**) schedules are reconsidered due to the ambitious timeline and constraints compounded by parallel industry activities, competing operational program of works and limited resources.

PLUS ES feedback for the AEMC's consideration has been provided in the accompanying appendices as follows:

- Appendix A – Detailed feedback on topics; and
- Appendix B – Feedback on specific NER/NERR clauses.

In addition to the detail provided in the appendices below, PLUS ES would welcome further discussions in relation to this submission or any other item relating to this draft rule consultation. 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.

Sincerely,

Rob Amphlett Lewis
Group Executive of Distributed Services and PLUS ES

APPENDIX A – DETAILED FEEDBACK ON TOPICS

PLUS ES provides the following for the AEMC's consideration.

1. Accelerating the smart meter deployment of smart meters across the NEM

PLUS ES supports the drafting of the rules to support the acceleration of smart meter deployment, including:

- The accelerated timeframe period of 1 Jul 2025 - 30 Jun 2030 – The proposed timeframe of 1 Jul 2025 to 30 Jun 2030 is sufficient to provide all customers with the opportunity to replace their old meters with smart meters, as well as deploy new smart meter installations alongside regular metering installations (**BAU**). It is important to note that there is a difference between making smart meters available to all customers and achieving a universal penetration rate of smart metering by the end of 2030. Factors such as lack of access, customer refusals, and site defects that require remediation will likely affect the successful installation of smart meters, resulting in a percentage of sites within the NEM still using legacy meters.

  We do recommend that the AEMC consider reducing the LMRP lower target for the last Interim Period (FY5)[1] from its current level to 10%. Typically towards the end of a program, resources tend to migrate to work programs which offer guaranteed work and employment stability. This reduction would allow for more efficient deployment of resources, enabling metering parties to redirect their resources to focus on reattending the sites where the replacement of a legacy meter was unsuccessful in previous attempts, compared to first time LMRP site visits.

- The operational efficiency of having the LMRP detail transparent to participants in MSATS. Using the existing Blind Update Tool (**BUT**[2]), as discussed in industry forums, would deliver a seamless and efficient process (Figure 1). Participants would have to build for a new field in MSATS, but this cost would be a one-time cost compared to the ongoing operational costs for the alternative process. The cost to introduce this field in MSATS would also be incremental as there are other fields required to be developed for MSATS as a result of the proposed Rules.

  The alternative, as shown in Figure 2, would introduce a delay in the provisioning of relevant information, requiring additional administrative burden and consequently costs on participants and adding unnecessary dependencies on other parties to provision information which would otherwise be available to relevant parties directly via MSATS. See below comparative high-level flows. Both Figure 1 and 2 depict high-level process flows that illustrate the general

[1] Financial year ending June 2030
[2] A bulk update tool which was introduced for the MSDR industry project. This tool was successfully utilised by LNSPs to update approximately 400,000 MSATS records daily.

steps involved in a specific activity. While the specific activities and tasks may vary among participants, the non-MSATS option introduces additional effort, and by extension increased operational cost. This impact is consistent across all parties involved. For example, the incoming Retailer being provided with the LMRP date. In the MSATS option, Figure 1, the Retailer will use their current processes (their internal systems or MSATS browser) to receive the information directly from the market system. In the CSV option, Figure 2, the Retailer has a reliance on the LNSP to send the information to inform them of the LMRP date (automatically triggered or manually requested) or the MC to notify them of a LMRP date via bilaterally agreed processes.

Figure 1 – LMRP Date available via MSATS

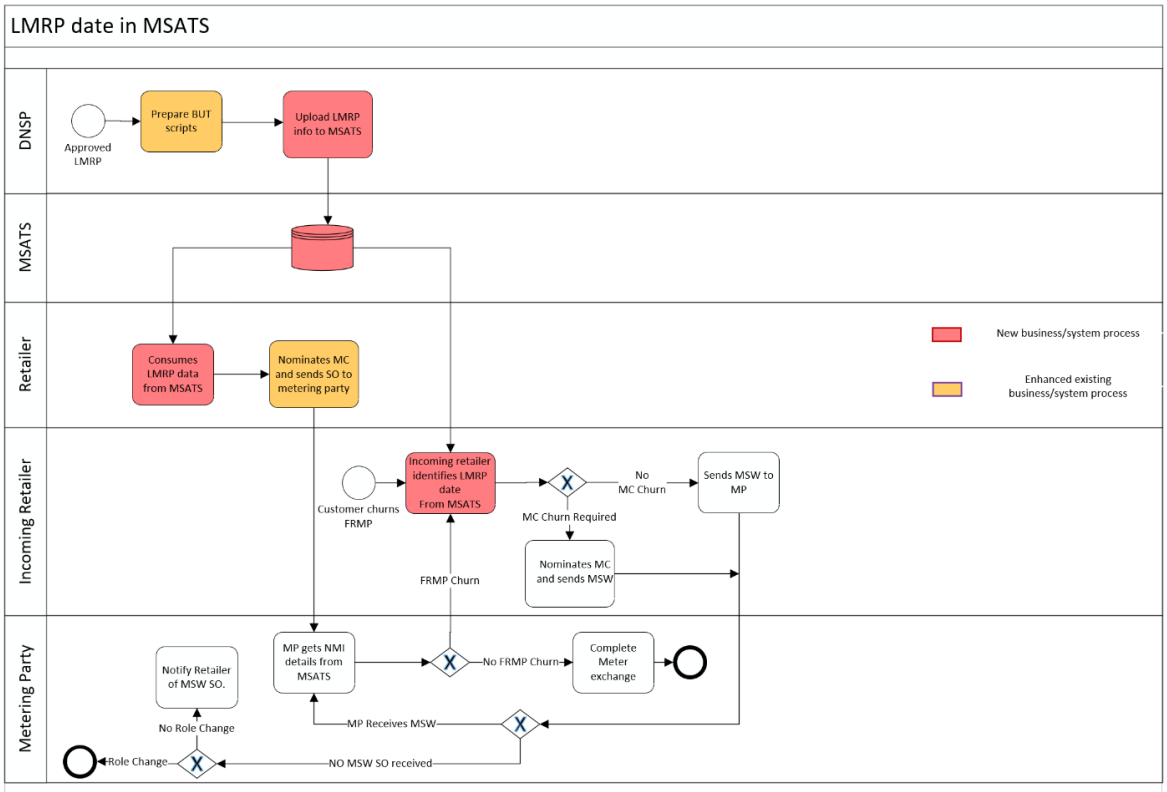
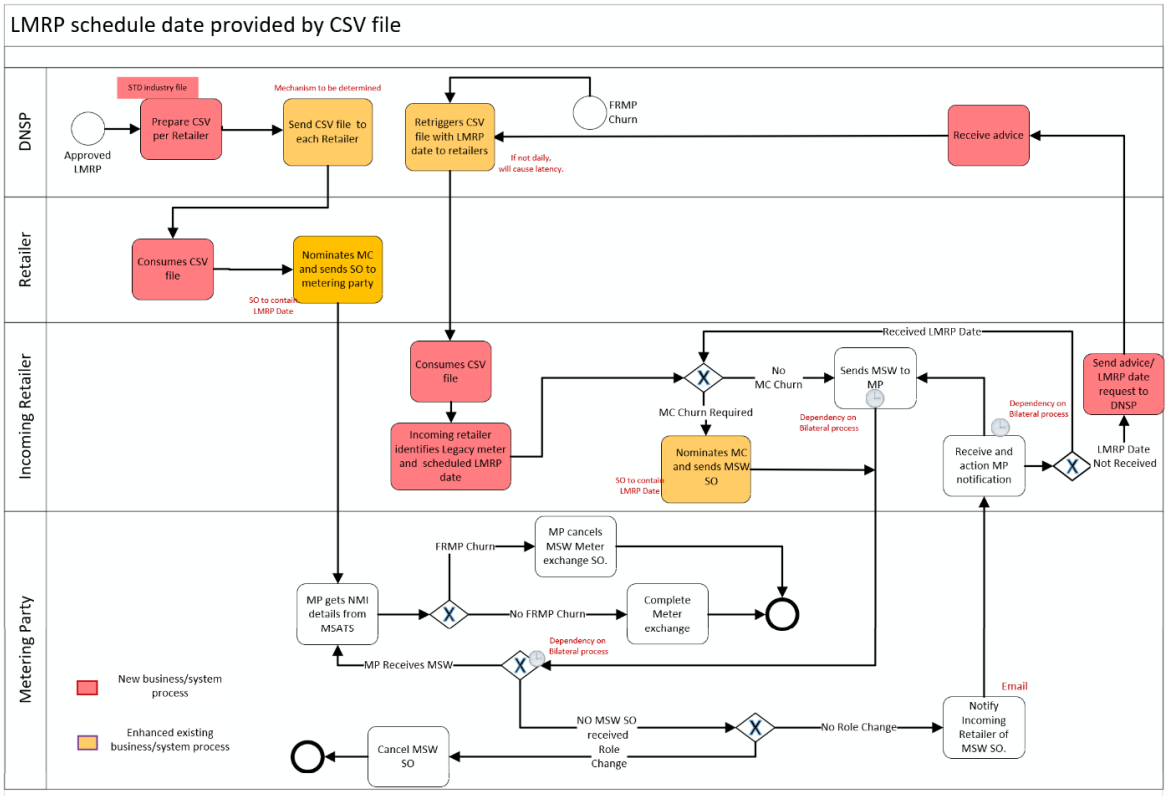


Figure 2 – LMRP date available via B2B Communications



- Due to the importance and complexity associated with managing metering installations of life support customers, we recommend that these sites are scheduled evenly across the LMRP timeline, and the rules prevent them from being concentrated within a one or two year period.
- We also note for AEMC's consideration, that the current rule drafting and determination report do not propose an enabling measure for an even distribution of multi occupancy sites within the LMRP interim target. Without such a measure the individual Retailer's and/or MC's metering deployment scheduling could potentially lead to a front loading of multi occupancy sites within a particular LMRP year. The majority of multi occupancies require the LNSP to isolate and front loading these sites will creating a 'feast' or 'famine' approach, placing pressure on LNSP resources to meet their timeframe obligations and consequently creating multiple downstream field deployment impacts.
- Whilst not an immediate consideration, we note that AEMC determinations to date have remained silent on managing the expected residual legacy meters post 2030. This will require a coordinated effort from market participants, regulators, and customers to ensure a smooth transition to a more efficient and modern electricity grid. It is our recommendation that the AEMC, incorporates a requirement for an industry impact assessment post 2030 to review and consider residual legacy meters.

2. Enabling better access to Power Quality Data (PQD)

The benefits and provisioning requirements for PQD was discussed and analysed extensively during the AEMC Metering Review. The discussions and feedback were facilitated by the AEMC team predominantly via individual discussions with relevant parties and a subgroup mostly involving MCs and LNSPs.

The LNSPs were asked to provide use case where the provisioning of PQD would be beneficial to the stability and safety of the network. Meanwhile the MCs were asked to provide confidential feedback on the PQD supported by their metering assets including information on infrastructure and operational costs to enable the provisioning of PQD to the LNSPs. The Commission in the final Report determined that LNSP could access Basic PQD at zero cost.

To mitigate the cost impact[3] on the MC and support the majority of the LNSP use cases including the neutral integrity test (primary use case for receipt of PQD for all NMIs), industry discussions concluded that there would be a Basic PQD set. Any additional services or greater delivery frequency of the PQD would be considered as Advanced PQD; requiring commercial agreement between the MC and the LNSP. The Basic PQD set was to be based on the following principles:

- Will only include voltage, current and phase angle, per phase;
- To include instantaneous value as this would support most if not all use cases provided to the AEMC;
- Frequency to be a daily batch and delivered outside market settlement data delivery timeframes. The data remained historical and six hourly batches increased operational costs and could impact the delivery of market settlement metering data;
- To be provided for all NMIs with eligible metering and as they become available – any requirement for NMI selection to be classed as Advanced PQD services;
- To be provided for small customer NMIs with enabled remote communications and technical capable of delivering 5 min trading intervals – no manual reading would be required or a program of works to update meters which have been previously grandfathered from programs such as 5 Minute Settlements etc.;
- Processing not required - No benefits in validating or substituting PQD; and
- Storage requirements would not exceed 7 days.

Following the Metering Review final determination report and industry discussions to date, PLUS ES has the following feedback for the AEMC's consideration:

[3] Any additional data channel/element or operational activity, increased frequency would increase the cost to the MC to provide PQD.

Effective Date

In addition to the feedback of NER/NERR schedule effective dates below, PLUS ES supports that the effective date of PQD be deferred for a minimum of 12 months to 1 Jul 2026. The primary supporting factors for the recommendation:

- Allow metering acceleration business and system changes to be deployed and stabilised;
- A small number of the PQD requirements are defined by the draft rules. Instead there is a dependency on AEMO to engage, consult and update their procedures before the requirements are completed and the downstream impacts identified;
- Industry readiness –
  - Resourcing to provide due diligence during the procedure consultation within a timeframe which would enable 1 Jul 2025 compliance date will be challenging;
  - Increased risk that participants will not be ready and/or inefficient outcomes will be delivered; and
  - Accreditation/registration amendments will be required for metering parties - generally accreditation or registration has a dependency on the metering party's systems and/or processes.
- Enabling an alignment with AEMO's Foundational and Strategic Initiatives (**FaSI**) to ensure the solution implemented avoiding the need for a costly transition to a new platform in the near future. This approach will help minimise duplicated costs and reduced the complexity of implementing the solution.

Defining Basic Power Quality data

'The characteristics of the power supply as measured by the meter, which includes measurements of voltage (in volts), current (in amperes), and power factor (expressed as the ratio of the active power kW to the apparent power kVA or as a phase angle).'

The current proposed definition of PQD (above), is quite broad if it is intended to define Basic PQD. We have reservations regarding two aspects of the definition which could increase the scope:

- The use of the term '*which includes*' – this can be interpreted as at a minimum it must include voltage, current and power factor but other power quality channels could be included. As previously indicated any deviation to the above determined requirements will increase the MC costs to provide PQD without a confirmed cost recovery pathway.
- The inclusion of *'power factor (expressed as the ratio of the active power kW to the apparent power kVA)'* – the use of the word '*ratio*[4]' automatically conveys this value is a calculated

[4] The quantitative relation between two amounts showing the number of times one value contains or is contained within the other.

value, not a characteristic of power supply as measured by the meter.

- Power Factor can also be estimated using the voltage, current and phase angle information that is part of the Basic PQD. Hence, we should delete the Power Factor and associated text and only include voltage, current and phase angle.

Additionally, the current draft rules appear to be silent on the Basic and Advanced concept of PQD. To address this, PLUS ES suggests defining Basic PQD as a minimum standard with specific principles, and Advanced PQD as additional services and data beyond the scope of the basic standard.

For example, Basic PQD defined as: The measurements of voltage (in volts), current (in amperes) and phase angle, as measured by the meter.

Basic PQD minimum principles

The draft rules require AEMO to update the procedures for PQD. To prevent any potential deviations from the pre-determined scope of Basic PQD, as an outcome of this Rule change or future AEMO procedure consultations, which could have significant cost implications for the MC, PLUS ES recommends including a set of minimum principles in the Rules, similar to metering specifications, to serve as a guide for AEMO's and industry's determinations. We recommend that the above itemised principles be captured to define what Basic PQD is.

Access and commercial arrangements for Advanced PQD

Implementing restrictions by not enabling a pathway in the Rules which prevent the MC from entering commercial agreements for the provisioning of PQD (Basic or Advanced) undermines the organisation's commercial business model and value. As a commercial entity the contestable MC relies on the revenue of the products and services to cost recover and earn a return on their investment.

The current draft Rules have not enabled a pathway for the MC to provide services in addition to the Basic PQD and to be able to enter commercial agreements for those services. For the reasons above it is our recommendation that the AEMC introduce a NER clause like NER clause 7.6.1(b) for metering data, which clarifies that the MC can enter commercial agreements for the provision of Advanced PQD with the LNSP and PQD to requesting parties such as other market participants, third parties and customer agents. Additionally, we do not support any amendments to the Rules which would restrict our capability in providing commercially agreed Basic or Advanced PQD to parties other than LNSPs. It is our expectation and assumption in developing our commercial models that access parties would mirror at a minimum the current access parties indicated in NER Table S7.5.1.1 Minimum Services Specification – services and access parties' clause (e), the LNSP, the FRMP or the person to whom a *small customer* has given its consent under clause 7.15.4(b)(3)(ii).

Storage and processing requirement

PLUS ES supports that processing PQD data not only incurs additional costs but also serves no practical purpose, as it is redundant and does not provide the same value as metering data. Cost determinations provided to the AEMC did not include CAPEX/OPEX costs for these requirements.

- Validation – Validation should only be limited for the metering party to confirm the PQD provided is for the assigned metering installation and that it conforms to the correct format such as CSV or JSON and the expected structure and schema. Anything above this scope should be left for the LNSP to perform the analysis as custodians of the network.
- Processing – Placing any obligation on a metering party to process PQD places an administrative and cost burden on the provisioning party whilst being quite misleading for the recipient of PQD to try and substitute a value as it is not a true reflection of the network activity during that interval. This activity would also require us to ingest the volume of data in our internal systems which would also requires us to scale our systems to cater for a great volume of data more than the comparable metering data for the same trading interval. For example, in addition to metering data, the power quality data intervals per element per phase would be as per Table 1 below:

  Table 1 – Basic PQD Daily intervals per meter phase

Phase	Basic PQD channels	Daily intervals
1P meter	3	864
1P2E meter	5	1440
3P	9	2592

- Storage **–** The requirement to store PQD must be balanced with the requirement to maintain actual metering data as PQD is not required to support market settlements. To achieve the objective to mitigate the costs on the metering party, PLUS ES recommends that PQD is stored within the metering installation similarly to metering data. The metering installation has limitations with respect to the data storage capacity. The storage capacity is affected by the amount of data it needs to store, and that extending the storage period for PQD will reduce the storage capacity for actual metering data. It's worth noting that the metering installation's storage capacity is not solely dedicated to metering data and PQD, but also records other important data such as events and alarms. Industry discussions had previously determined that 7days of PQD storage would suffice. Any consideration to increasing this timeframe should be underpinned by cost benefit analysis.

Role accountability

PLUS ES does not support having the MDP role accountable for PQD as it is not meter data. Electrical power quality refers to the level of consistency, reliability, and stability of electrical power. Hence, this could then be seen as 'electrical engineering data'. Considering the above PLUS ES proposes that:

- All the obligations are placed on the MC, who would then ensure that their service provider/s ensure their compliance; or
- The MC is accountable for the delivery of PQD, and the MP has the obligation to ensure the metering installation is recording PQD.

3. Retailer to provide meter deployment notices to customers

PLUS ES supports the changes with respect to the customer metering installation notice to be provided by Retailers. The reduction from two notices to one, delivers efficiency in the End to End (**E2E**) process by mitigating potential break points, minimising customer communication 'noise', and reducing the administrative effort and associated costs.

Furthermore, the removal of the customer opt out clause is expected to deliver an increase in successful smart metering installations. We do not believe that this action will impact the social licensing of the smart meter, as the customer will still have the option to refuse remote communications and whilst site defects will be tracked and monitored the customer will not be mandated to remediate.

However, to further reduce potential barriers, we propose the following for AEMC's consideration:

- The Metering Review final determination recommended, and the draft rule determination indicates that the notice can contain a date range. This has not been reflected in the drafting of the rules. NERR clause 59A(3)(b) still maintains the wording *'expected date and time'*. For customer social licensing, managing customer expectations and mitigating rescheduling works visible to the customer[5], PLUS ES recommends that the wording is amended to include date range e.g. 'expected date and time or date range'. PLUS ES believes a 15 business days timeframe would deliver efficiencies especially within an accelerated deployment program.
- The current wording of NER Clause 59A(2) introduces a universal dependency on the customer receiving the notice 4 business days prior to the metering installation before the

[5] Various factors could affect the FSP meeting a specific scheduled date, including weather events and availability of resources due to human factors like illness or a preceding job running over time, which might cause a domino effect on subsequent scheduled jobs. When the customer has been informed of a date range for the FSP's attendance, any necessary rescheduling can be easily accommodated without inconveniencing the customer with extra notifications or work delays.

meter can be exchanged. To prevent delays in meter installations and avoid a negative customer experience, PLUS ES proposes the Rules allow for a caveat, similar to the planned interruption notification, which enables the notice to be provided up to the day of installation, where a customer has requested and agreed to a installation date or urgently requires a meter replacement, making it impractical to provide the retail notice a minimum of 4 business days prior to the exchange.

- Allowing for a transitional period to the effective date – PLUS ES agrees with the immediate value these changes will deliver and should become effective as soon as possible. We also recognise a transitional period will be required to accommodate inflight Retailer Led Deployment (**RLD**) customer notices.

4. Meter Malfunctions

PLUS ES supports the objective and the efficiencies introduced with providing a timeframe distinction for individually identified metering installations and family failures. We note that malfunctioning metering installations triggered by large scale force majeure events like bushfires and floods would be currently identified as individual metering malfunctions (15 business days timeframe). For streamlined efficiency, as the volumes of these meters could be in their thousands, PLUS ES recommends that the AEMC considers identifying these malfunctioning meters separately from individual malfunctioning meters and applying to them their own specific timeframe to reduce the administrative burden on the MC and AEMO in administering these volumes of exemptions. Additionally, ensuring that AEMO make allowances for these malfunctioning meters in their associated procedures.

5. Shared Fusing Meter Replacement Procedure (SFMRP)

PLUS ES supports the objective and the efficiencies introduced with this new clause 7.8.10D, such as:

- Placing obligations and timeframes for participants to undertake their respective actions;
- Clarifying that the planned interruption notification is a LNSP obligation; given that they are the common participant on all customers impacted by the supply interruption, and they are scheduling the outage;
- Requiring the LNSP to schedule the isolation requests within a timeframe which allows both the Retailer and the metering party to undertake their activities including scheduling the resources to attend the site;
- Introducing the concept of Original MC; and

- The criteria underpinning the use of this procedure such as a metering installation or maintenance which requires an interruption to another customer small or large.

We also believe that this requirement would suit a large percentage of shared fuse sites. However, there are opportunities to improve the efficiency and recommend the following for the AEMC's consideration:

- The current procedure does not cater for a rescheduling scenario where the LNSP needs to postpone the isolation, due to factors beyond their control such as a force majeure, weather such as rain or other external influences such as protests, pandemics etc. Whilst the scoping of the site will not be required, a timeframe and obligation is required for participants other than the LNSP to be notified of the scheduling change and the metering party to reassign resources to ensure that the attendance on the rescheduled date.
- In clause 7.8.10D(e), the obligation of the Retailer to appoint the MC is extended to include any necessary arrangements. Presently, whilst being nominated as an MC in a timely manner, operational challenges are experienced due to the delayed provisioning of arrangements by Retailers, such as raising service orders, to enable the metering party to proceed with completing the request. The use of the word arrangements does not make the procedure too prescriptive.
- Clause 7.8.10D(c) – PLUS ES recognises the distinction is made for non-legacy meters but there are assumptions made for this clause which makes it complex.

  The scenario an MC can encounter at a shared isolation site are as follows:

  - Scenario 1 - All impacted NMIs have smart meters installed with isolators – In this instance the work will continue as the individual meter can be isolated without interrupting supply to another customer. Whilst theoretically the NMIs have a shared isolation point this work will proceed as BAU.
  - Scenario 2 - All impacted NMIs have smart meters installed but one or more of the impacted NMIs have no individual isolators[6]. In this instance when a smart meter without an individual isolator needs an outage for maintenance, all the impacted NMIs will incur an interruption of supply. If this is the case, PLUS ES recommends irrespective that the metering installation has a smart meter, the SFMRP applies. Furthermore, if the objectives of the SFMRP include in addition to accelerating smart metering, reducing the number of outages customers incur and lower isolations costs, PLUS ES proposes the following for this scenario. In addition to the identified smart meter without an isolator, the LNSP should identify any other smart meters without isolators on the shared

[6] A volume of smart meters has been deployed without isolators as the service installation requirements at the time of installation did not require an isolator to be installed.

isolation and undertake the same steps as would be applicable for legacy meters. The alternative approach of dealing with each meter with no isolator on a one-by-one basis, would result in the customers experiencing multiple outages similar to legacy meter use cases.

- Scenario 3 - One or more impacted NMIs have a legacy meter – In this instance the SFMRP would apply.

The current wording of this clause and associated clauses appear to be quite confusing in determining which clause applies to which scenario. PLUS ES makes the following recommendations to simplify the determination:

- Clause 7.8.10D(c)(2) wording is amended to be inclusive of all metering installations that cannot be isolated independently without interrupting supply to other customers (Legacy meters and smart metering installations without isolators). The procedure would be generic enough to cater for the above-mentioned scenario 2 & 3.

  Then for the remaining use cases - Scenario 1 - where all the meters on the shared isolation are smart meters with isolators does not need to be captured under the SFMRP as the meter can be maintained without impacting the supply to another customer. NER Clause 7.8.10D(c)(1) could be removed.

- Clause 7.8.10D(c)(1): This clause has certain limitations; hence why PLUS ES has proposed the above alternative. If this clause is to be maintained, then additional obligations need to be included to ensure efficient co-ordination between parties. The proposed wording in this clause places the timing of the obligation on the MC but the MC has a dependency on the LNSP to schedule the works, notify the Retailer to provide the service order etc. PLUS ES recommends for the avoidance of doubt, similar to the requirements of legacy meter coordination, this clause is amended to include obligations such as:
  - The LNSP to notify all impacted customers of the outage;
  - Scheduling of the works to provide enough time for the Retailer to make the necessary arrangements and for the metering party to attend on the LNSP scheduled date;
  - Notify the Retailer of a scheduled date. The scheduled date will also have to allow for obligatory timeframes to be met, irrespective of the party; and
  - A timeframe for the Retailer to notify the metering party.

  Working backwards from the proposed timeframe of 40 business days and the indicative timelines in NER Clause 7.8.10D, defining that day zero is the day the MC becomes aware of the shared isolation and aborts the job, then no time is allowed for the MC to visit the site, as indicated below.
  - 5 business days for the MC to notify the Retailer;

- 5 business days for the Retailer to notify the LNSP;
- 20 LNSP to visit and scope the site; and
- 10 business days for the Retailer to send service order = 40 business days.

- We also note that there will be outlying cases, where the timelines indicated in clause 7.8.10D(d) will not support certain scenarios. For example, where there are 30 NMIs on a shared isolation and the metering installation of these NMIs cannot be achieved within one day or where the meter board is confined in a small space and safety requirements, limit the access for technicians. The current drafting has not made allowances or provided clarity with respect to compliant deviations from the drafted procedure timeframes to cater for such scenarios.

6. Defect Tracking and Monitoring Process

PLUS ES supports the initiative and objective of the defect tracking and monitoring process. We have noted points of concern which need AEMC's considerations for overall market efficiency:

- NER Clause 11.[XXX].11(a)(1) constrains the process to where the defect is identified during a site visit to replace a Legacy Meter. Site defects could result post a successful smart metering installation and prevent any subsequent meter installations. PLUS ES supports there is value in the follow up activities post defect identification and recommend that the conditional prescription of Legacy meter is removed to include any metering installation.
- Defect flag versus defect enumeration[7] in MSATS – Providing the Retailer and customer with the type of defect identified on site is crucial in building transparency. Sharing at a minimum, the type of defect with the customer[8] and the recommended course of action, will help to alleviate their concerns and potentially minimise the volume of subsequent customer queries. PLUS ES recommends that having enumerations in MSATS would deliver a seamless, overall cost-efficient process for the Retailer, incoming Retailer[9] or any party who has a financial interest in the NMI, to gain access to the defect type, irrespective if the metering party who identified the defect has churned[10] or not.

  AEMO raised concerns with the defect type enumerations, identified in Table 2 below, being stored in MSATS. To achieve this the defect enumeration needs to be classified as NMI standing data. PLUS ES would like to note that for years, the Hazard field has been available

[7] Industry defined values to be used to communicate defect types in a consistent manner between market participants.
[8] A customer moving into a site with an existing defect, would not be aware that a defect exists or the type of defect, as the previous customer would have been provided the details.
[9] The metering party generally provides the defect details to the Retailer via their service order request. An incoming Retailer does not have access to a service order raised by the previous Retailer.
[10] A metering party not currently in the role, has no access to the NMI Standing Data to validate if a requesting party should be provided site specific information.

in MSATS which held and currently holds similar context of site information.

Both Figure 3 and 4 depict high-level process flows that illustrate the general steps involved in a specific activity. While the activities and tasks may vary among participants, the fundamental essence that supplementary effort, is required by the non-MSATS option, and by extension increased operational cost, is depicted clearly, and remains consistent across all parties involved. Additionally, it highlights that it creates a variation in the process dependent on the Retailer.

With the inclusion of the defect enumeration in MSATS, the defect flag would not be required, as a populated enumeration would suffice to indicate there is a defect on the site whilst providing a high-level detail of what the defect is. The following indicative enumerations were proposed to be included in MSATS:

Table 2 – Defect types which will prevent a metering installation.

Enumerated code	Description of defect
ASBESTOS	Asbestos
PANELNCOM	Non-compliant meter panel
PANELLOC	Relocate meter panel
NOSPACE	Insufficient space
NOFUSE	No service fuse
FUSENCOM	Non-compliant fuse
WIRINGDET	Deteriorated cables
LIVEWIRING	Live parts behind panel
WIRINGNCOM	Non-compliant wiring
BOXDAMAGED	Meter box damaged
OBSTRUCTION	Obstruction to meter panel

The alternative would introduce a process with latency in the communication of relevant information, requiring additional administrative burden and consequently costs on participants and adding unnecessary dependencies on other parties to provision information which would otherwise be available to relevant parties directly via MSATS. It also places constraints on the MC provisioning the details once they have been churned out of the role for that NMI due to no longer having access to confirm if the party requesting the details is entitled to that information. See below comparative high-level flows.

Both Figure 3 and 4 depict high-level process flows that illustrate the general steps involved in a specific activity. While the activities and tasks may vary among participants, the non-

MSATS option introduces additional effort, and by extension operational cost. This impact is consistent across all parties involved. Additionally, it highlights that it creates a variation in the process dependent on the Retailer.

Figure 3 – Defect Enumeration in MSATS

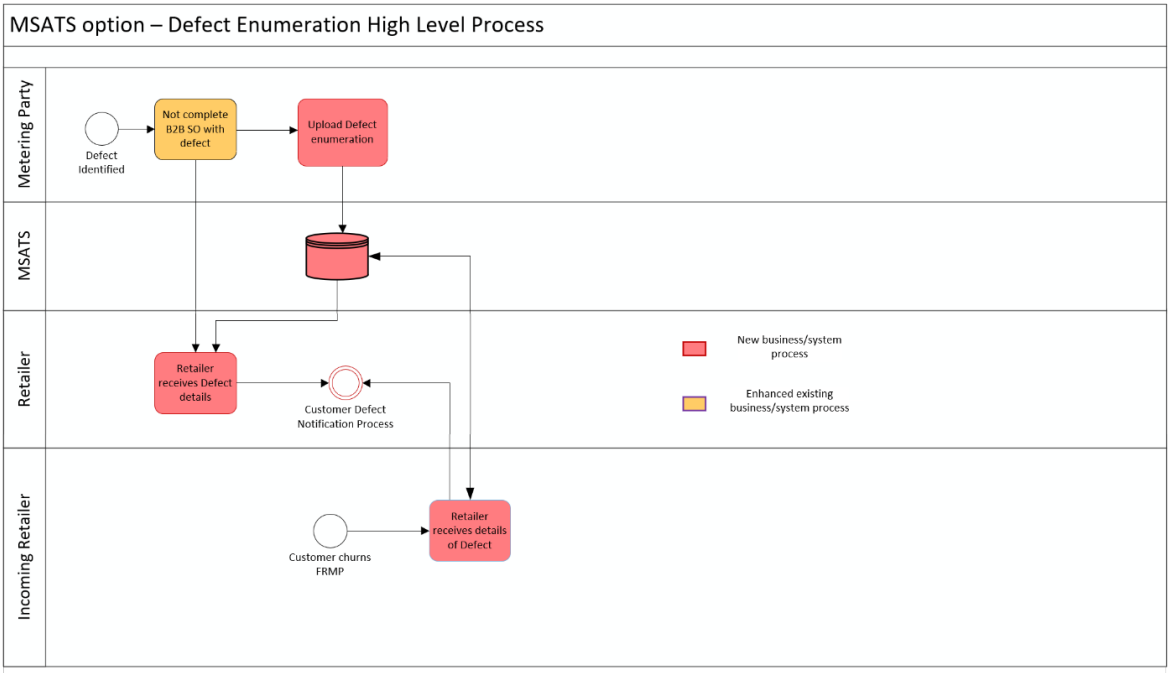
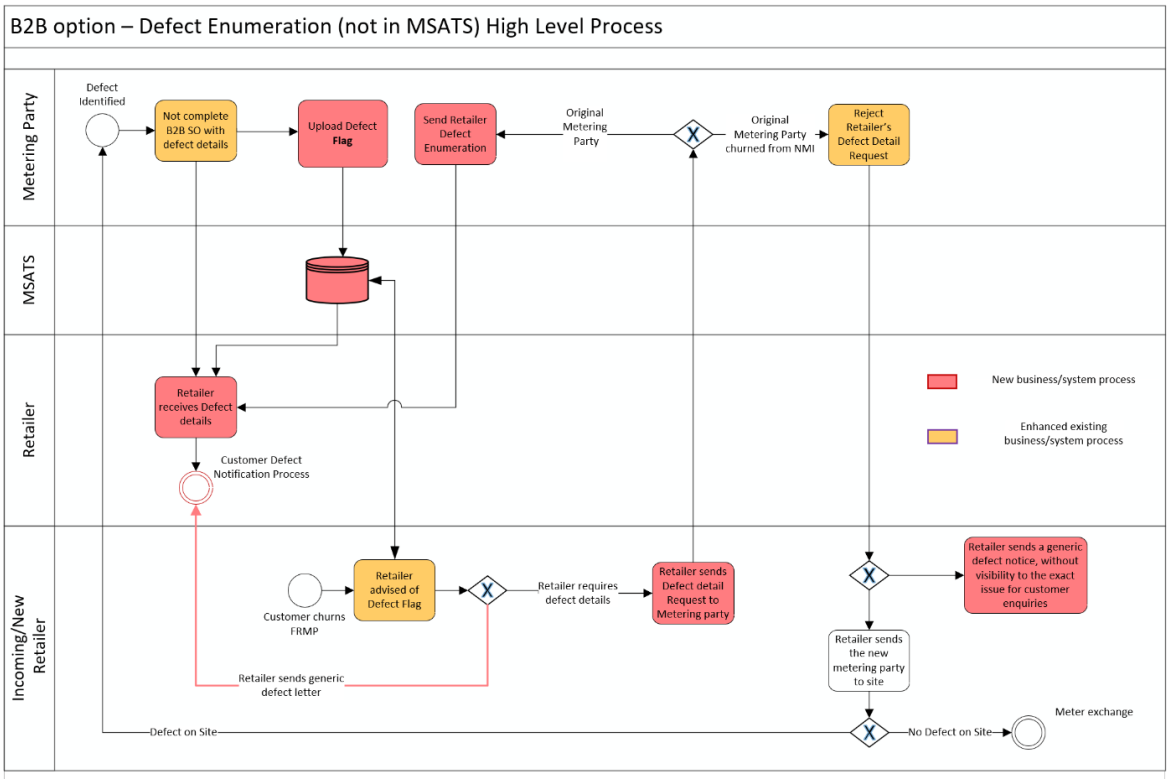


Figure 4 – Defect details maintained by metering party who identified defect.



- Access to the defect details – NER Clause 11.[XXX].11(a)(1) restricts access for this information to the FRMP, though it is the MC who will be populating the information in MSATS and the MP who will be discovering the defect. It is our recommendation that at a minimum the metering service providers should access to this data. We also see value in allowing accesses to the defect details in MSATS to any current role on the NMI.
- Customer move in – The process caters for the scenario where the customer may churn FRMP and then limits the notices to a combined total of two. There is a gap in the provisioning of the requirements for the scenario where a customer moves into a new site. Due to the max allowance of notices been reached the new customer on the site will never be informed of the site defect. Given the volume of Retailer churn and customer move ins, PLUS ES recommends that the process recommences for a customer moving into a site, irrespective of the number of notices previously provided. Identifying a customer move in is readily available to Retailers when on boarding a customer.
- NER Clause 11.[XXX].11(a)(2) – It would be a more efficient process for the defect notices information to be administered within the Retailer's own systems rather than also requiring the Retailer to record that information in MSATS. Assuming this information will benefit only the incoming Retailer, for an incremental number of NMIs, and the process nuances requiring a more complex solution, PLUS ES suggests that a cost benefit analysis would not support this requirement and recommend an alternative is considered. Defect notice administration in MSATS would require all market participants to undertake MSATS changes (design, build, test and implement fields), which will provide no value to them.
- PLUS ES recognises that capturing site defects for all NMIs at a multi occupancy site would be beneficial. However due to current data access rules and the commerciality of the MC, this becomes a complex and restrictive process. The following would have to be considered and resolved:
    - MC NMI Discovery is required to identify all the impacted NMIs;
    - Requiring the first MC at a multi occupancy site to undertake a scoping exercise and identify all the meters including those they are not responsible for. Best endeavours would be required as it is not always possible to identify the NMI/meter without support from the customer;
    - An MC cannot capture the defect information in MSATS against a NMI for which they are not responsible for;
    - The LNSP is the common participant at the site and could potentially update the defect information in MSATS against a NMI – though this process would introduce

inefficiencies.

- PLUS ES also proposes that the AEMC considers the benefits of retrospectively updating defect information into MSATS, once the MSATS system solution is available. That is, if a NMI was identified with a defect which prevented a metering installation, within six months prior to the effective date, and there was no subsequent meter exchange, the MC would take undertake best endeavours[11] to update MSATS to trigger the defect notification process.

7. MC NMI Discovery

The removal of MC NMI discovery since Q3 2023, has created operational challenges for metering parties and by extension to the Retailers and their customers. Below is a list of scenarios for which MC NMI discovery was used. There is no alternative mechanism to acquire the equivalent information as a contestable metering provider, thus it is imperative to find a resolution. This issue was never raised during the metering review as metering parties had access and never envisaged that it would be removed.

Once the capability was disabled by AEMO, industry participants raised awareness to the AEMC team of the impacts. In the AEMC Metering review final determination the Commission viewed this as an issue that should be considered further during the rule change process, in the context of the one-in-all-in approach and potentially other circumstances where metering coordinators require access to NMI Discovery when undertaking meter upgrades or replacements. Whilst the shared fuse metering replacement procedure resolves some of the gaps associated with the MC NMI discovery it does not cater for all scenarios.

These use cases are not new nor only applicable to the contestable metering parties. Network affiliated MPs experience most if not all of the below use cases. The distinction lies in their dual role as both the LNSP and the MP on the NMI within their distribution network, granting them access to the necessary information.

The AEMC has advised there is an initiative which is being considered internally that includes access rights to data. Unfortunately, the current delay and future prolonged delays in granting the necessary access to metering parties as required to resolve customer enquiries/complaints and enhance operation efficiencies will continue to cast a negative light on contestable metering providers, smart metering, and Retailers. It could potentially give rise to ombudsman cases.

Some large volume use cases for MC NMI Discovery:

[11] Best endeavours recognises that this requirement is a new obligation and current metering systems/processes may not support an efficient retrospective update.

- One in all in process – instances where an MC has not attended a site and their customer could potentially be left off supply or have a meter by passed. The MC on site has no way of identifying the Retailer of that customer to mitigate the customer outcome. The likelihood of this scenario unfolding is significantly higher than low;
- Identifying Large sites to self-nominate as MC – Having been advised by the customer they are a large customer we nominate for the MC role only to have our requests rejected – inefficient process which requires follow up with the customer or their agent; and
- Cross metering – For use cases where the wiring has been connected to the incorrect metering installation, and the other impacted meter/s are not with the MC investigating the issue nor with the Retailer who has sent the MC to site. This could be a customer disputing their energy consumption and there no way in identifying who the Retailer and/or MP is on the other meter/s to coordinate a planned interruption to resolve the cross-metering cause.

8. Creating a fit-for-purpose testing and inspection regime

PLUS ES supports most of the proposed changes by the AEMC and have the following recommendations for their consideration:

- The pause on the family testing for legacy meters – PLUS ES is supportive of these changes and recommend that the pause is a permanent determination to mitigate the reestablishment of operational costs post 2030 which deliver no benefit. It is expected that any legacy meter sites remaining post 2030 would be due to exception scenarios such as customer refusal, no access and site defects requiring remediation. There's an anticipation that if we could obtain access to conduct meter family testing, we would be able to proceed with the exchange of the legacy meter. However, in the case of site defects, merely testing to confirm that the legacy meter needs replacement does not address the defect and therefore does not facilitate the installation process.
- Effective date – as per feedback included in PLUS ES' submission.

9. NER/NERR schedule effective dates

PLUS ES has concerns around some of the schedule effective dates. Factors which have been considered in our recommendations are:

a. We have adjusted our delivery cycle to May/November cycles, aligned with market practices, and would prefer not to continually introduce other break out delivery patterns, as this causes inefficiencies.

b. The summer months, especially December and January present resource challenges due to the Christmas shut down period, school holidays, and annual leave requests.

c. The changes are significant and the associated process/procedure impacts need to be considered to ensure efficient operational transition and positive customer outcomes.

d. Changes are not limited to market processes and procedures. Accreditation/Registration processes, commercial agreements have a dependency on the finalisation of the Market procedures and sufficient time to allow their development and execution.

e. The industry is undergoing change fatigue with the current inflight and imminent parallel initiatives and finite resources. For example, the below initiatives, to name a few, will be happening simultaneously; that is, either in development, implementation, or post implementation delivery cycles:

- Unlocking CER;
- Ramp up of Acceleration of smart meter implementation;
- Power Quality Data;
- AEMO FaSI;
- DER Register;
- BAU Retail Procedures; and
- Operational BAU Enhancements.

For the reasons above we provide the following for the AEMC's consideration:

Table 3 – PLUS ES feedback on proposed effective dates

Schedule	Proposed	Recommended	Factors from above
NER Schedule 1- Malfunction meters, Shared fuse metering replacement procedure	22 Jan 2025	Aligned with AMRO other effective dates – mid 2025	(a), (b), (c) (e) System requirements are needed to deliver the process efficiently especially for 7.8.10D. This will not be achievable by 22 Jan 2025.
Asset Management Strategy (AMS) & Testing requirements	22 Jan 2025	Postponed aligning with AMS changes for	All the above including supporting feedback throughout submission.

		Type 8 & 9 metering	
Schedule 2 - Power Quality data	26 Jun 25	1 Jul 2026	All the above including supporting feedback throughout submission.
Schedule 3 – LMRP related	25 July 2024	Support proposed	No feedback
11.[XXX].12 & 11.[XXX].13	25 July 2024	Support proposed	As per supporting feedback throughout submission
NERR Schedule 1	25 July 2024	Support proposed	Allow a transitional period as per feedback.
NERR Schedule 2	26 June 2025	Support proposed	No change
NERR Schedule 3	25 July 2024	Support proposed	No comment

10. Obligations for the Retailer to make necessary arrangements with their metering provider within required timeframes.

Whilst Retailers are promptly nominating the MC, operational challenges are experienced due to the delayed provisioning of Retailer arrangements, such as raising service orders, etc, when requested by metering parties to perform an activity to meet their obligations. This may cause a backlog of site visits which are awaiting those arrangements. Whilst raised in an industry working group, the working group's advice was to have an obligation in the Rules.

The projected impact is expected to amplify with the acceleration of the metering deployment program, particularly in scenarios involving Retailer churn. PLUS ES recommends that the AEMC in addition to placing obligations on the Retailer to appoint MC should also place an obligation on the Retailer to make associated arrangements with the same timeframe of nominating the MC or no later than 5 business days following the request from an MC.

11. Tariff/Charges variation notices

PLUS ES supports the initiative to provide the customer with a notice advising them of the potential changes to their retail plan due to the smart metering installation. Informing the customer in advance, should raise customer awareness, minimising negative publicity and enabling them to undertake activities such as reviewing their plans, adapting their electricity consumption behaviour accordingly to mitigate high bills.

Additionally, we support that the notice obligation is only applicable where a variation of tariff or charges occur for the period between 1 July 2025 and 31 Dec 2030. We do have reservations that applying these obligations to all meter replacements places an unnecessary cost burden on participants and could create retail notification 'noise' to the customer. Hence, we recommend that the AEMC limits the scope of this obligation to LMRP installations. That is, the variation of tariff notice is not required for customer-initiated requests such as solar installations, etc, as these customers would be informed of the retail product plan changes at the time of their request.

APPENDIX B – FEEDBACK OF SPECIFIC NER/NERR CLAUSES

The table below contains PLUS ES's feedback to specific clauses as indicated, for your consideration.

NER	
CLAUSE	**PLUS ES Feedback**
Chapter 7 - Metering	
7.3.1(a)(2)	PLUS ES supports the clause is amended to read: '…, the processing of the metering data,'. This aligns with the feedback provided in Appendix A-Section 2, supporting that PQD should not be processed.
7.3.1(a1)	The definition of '*technically capable of supporting'* should exempt the metering party from the obligation to provide PQD, where one or more of the criteria is met: • Remote communications are not supported – either due to telecommunications network coverage limitations or a customer requesting the communications to be disabled; • A period where the metering installation is experiencing a communications fault; and • Metering installations which have been installed in the past and are not capable of measuring/recording PQD as defined.[12]
7.6.1(b)	For avoidance of doubt, and to ensure the MC has an enabled pathway to enter commercial agreements to provide additional services beyond those defined in the Rules, PLUS ES recommends that the clause is amended to include PQD[13].
7.8.2 (a)	PLUS ES supports that this clause should also contain a requirement for the metering installation records PQD
7.8.2. (a)	PLUS ES supports that this clause should also contain the timeframe requirement for storing PQD similar to NER Clauses 7.8.2. (a) (9) and (10)

[12] Similar to exemptions of NER Clause 7.8.2(a1) or NER Clause 11.103.3(a)
[13] As per feedback provided in Appendix A.2

7.8.10D	PLUS ES recommends that the procedure is named 'Shared isolation meter replacement procedure'. Supply isolation can be achieved by: • Operating a shared isolation switch; or • Turning a circuit breaker off; or • By pulling a fuse out of its fuse carrier to break the current. Multiple meters can be downstream of one of the above, so it could be a shared switch, or a shared circuit breaker, or a shared fuse. It is just an issue of terminology – 'shared isolation' would cover all sorts of isolation, including the fuse pulling variety.
7.8.10(a)	Regarding – *'…requires interrupting supply to other **small** customers,'* PLUS ES notes that there is a misalignment between this clause and NER Clause 7.8.10 (a1). The latter clause references interrupting supply to another *small customer* or *large customer* and must instead be replaced pursuant to the *Shared Fusing Meter Replacement Procedure.* Whilst PLUS ES believes that it would be unlikely that a large customer would share a fuse, we recommend that clause 7.8.10(a) does not make a distinction on the customer for the isolation process. This would align with the requirement in NER Clause 7.8.10 (a1) and would apply a consistent isolation process irrespective of the customer classification.
7.8.10D(b)	The process proposed by the AEMC obliged the Retailer to provide the LNSP the name of the Original MC. This obligation has been missed in the proposed rule. PLUS ES recommends that the obligation is called out for completeness and to support downstream B2B market processes.
7.8.10D(c)(1)	As per PLUS ES feedback provided in Appendix A-Section 5.
7.810D(c)(2)	As per PLUS ES feedback provided in Appendix A-Section 5.
7.8.10D(e)	PLUS ES recommends that the obligation of the Retailer is extended beyond the requirement of appointing the MC. It should also require the retailer to undertake any supporting

	activities/arrangements to support the metering installation. As per supporting feedback provided in Appendix A-Section 10.
7.10	As PQD has been defined separately and aligned to our feedback in Appendix A-Section 2, PLUS ES recommends that all references to PQD are included in its own clause and the obligations not assigned against the MDP.
7.10.1(a)(1A)	PLUS ES recommends the following: • This clause is removed from this section and added to another as per above PQD feedback; and • Any referencing to the collection of PQD should include remote acquisition. That is, '*collecting power quality data* by *remote acquisition.*'
7.10.1(a)(4AA)	PLUS ES recommends that this clause is deleted and that the obligation to validate and substitute is not required or applicable to the provisioning of PQD as per our feedback in Appendix A-Section2.
7.10.1(a)(6)	As per our feedback provided against NER Clause 7.10, PLUS ES recommends that PQD is deleted from this clause and the delivery requirement captured under a PQD specific clause. Additionally, this clause needs further review as it references NER Clause 7.10.3 which is *metering data* specific.
7.10.1(a)(8)	As per our feedback provided against NER Clause 7.10, PLUS ES recommends that PQD is deleted from this clause and the delivery requirement captured under a PQD specific clause. Since the commencement of the Metering Review, industry PQD related discussions determined that there was no requirement for PQD to be held in a metering data services database, to reduce overall costs; nor was a use case or tangible benefit identified to do so. Also refer to our Feedback in Appendix A-Section 2.
7.10.2(e1)	As per our feedback provided against NER Clause 7.10 and Appendix A-Section 2, PLUS ES recommends: • This clause is captured under a proposed PQD specific clause; • The obligation should not be with the MDP; • An allowance is made for when PQD is not available; and

	• The term *'corrected'* implies a manipulation of the PQD recorded by the metering installation. Whilst this may be applicable to metering and market settlement data, providing such an activity for PQD delivers no benefit and distorts the value of PQD. Suggest re-wording to read: '...then, if the PQD provider must provide the correct power quality data that is available to the persons referred to in clause 7.15.5(c2)'.
7.10.3(a1)	As per our feedback provided against NER Clause 7.10 and Appendix A-Section 2, PLUS ES recommends: • This clause is removed from NER Clause 7.10.3 and included in a specific PQD services clause; and • The obligation is not placed on the MDP.
7.15.5 (b)	As per our feedback provided against NER Clause 7.10, PLUS ES recommends that PQD is deleted from this clause and the requirement captured in a PQD specific clause.
7.15.5(c2)	As per our feedback provided in Appendix A-Section 2, PLUS ES recommends that the PQD referred to in this clause is clearly defined as the scope of the Basic PQD. Additionally, the MC must have the ability to deliver Advanced PQD and services to the LNSP and AEMO, including all types of PQD to other access parties via commercial agreements. An enabling clause similar to NER Clause 7.15.4 (b) to include PQD: *'the Metering Coordinator must ensure that access to services provided by the metering installation and power quality data from the metering installation is only given to:* *(1) in respect of a service listed in the minimum services specification in column 1 of table S7.5.1.1 and of metering data in connection with that service, an access party listed in column 3 of table S7.5.1.1;'*
7.16.3 (a)(6)(i)	The draft rules reference this clause in the Draft NER amendments, [17] Clause 7.16.3 Requirements of the metrology procedure, but this clause does not exist. Suspected typo and should read 7.16.3 (c) (6) (i) instead.
7.16.3 (c)(6)(i)	As per our feedback provided in Appendix A-Section 2, PLUS ES recommends that PQD is removed from the obligation. Validation and substitution are not required for PQD.

	Whilst this may be applicable to metering and market settlement data, providing such an activity for PQD delivers no benefit and distorts the value of PQD, whilst increasing the operational costs of the provider. If there is a requirement for validation to the extent that the provider ensures that the PQD provided for a NMI is from the associated meter, then this should be called out in a separate clause not captured with the validation requirements for metering data which are significantly more complex.
7.16.6(c)(2)	As per our previous feedback including in Appendix A-Section 2, PLUS ES recommends that PQD is removed from this clause and a separate PQD specific clause is defined without the requirement for processing. We also support that the PQD variation of this obligation should be placed on the MC/MP.
7.16.6(c)(3)	As per our previous feedback including in Appendix A-Section 2, PLUS ES recommends that PQD is removed from this clause as it has been captured by NER Clause 7.16.6(c)(9), which more appropriate for PQD requirements.
7.16.6(c)(4)	As per our previous feedback including in Appendix A-Section 2, PLUS ES recommends that PQD is removed from this clause as it has been captured by NER Clause 7.16.6(c)(10), which more appropriate for PQD requirements.
S7.6.1(j)	'*Minor*' or '*administrative*' assessment whilst well intentioned could potentially create an impact to the MC which AEMO could not foresee. PLUS ES recommends that this clause is amended to indicate that 'minor' or 'administrative' changes to the Asset Management Strategy Guidelines follow the 'Minor' consultation procedure, at a minimum to validate assumptions made by AEMO.
Table S7.6.1.3	PLUS ES supports this is a minor change; however, there is an anomaly where a Type 2 metering installation is inspected less frequently (if check metering is installed) than a Type 3 metering installation. We recommend the follow amendments: Type 3 should be simply as follows: • Type 3 ≥2GWh PA - 2.5 years (align with Type 2)

	• Type 3 <2GWh PA - as per AMS
Chapter 10 - Glossary	
Legacy Meter	PLUS ES recommends that the wording *'in operation'* is deleted from the definition. It is a subjective term and could have multiple interpretations such as: not energised, not malfunctioning etc. To meet the objective of introducing *'Legacy meter'* in the Rules, and to ensure these meters are scheduled and targeted to be replaced by smart metering, the definition *'Means any Type 5 and 6 metering installation'* is succinct and sufficient.
Metering data services	As per our previous feedback including in Appendix A-Section 2, PLUS ES recommends that PQD is removed from this definition as all the services identified are not applicable to PQD. If required, PQD services should have its own definition – especially as PQD has been separately defined from metering data.
Power quality data	As per our previous feedback, including in Appendix A-Section 2, the definition is sufficient for all power quality but not to define the Basic PQD. PLUS ES recommends that a separate definition is included in the Glossary for Basic PQD. If this accepted, then the obligations will have to be reworded to make the distinction of what applies to the Basic PQD vs any PQD. For Basic PQD – PLUS ES recommends the definition is amended as per below: 'The measurements of voltage (in volts), current (in amperes) and phase angle, as measured by the meter.'
Shared Fusing Meter Replacement Procedure	As per previous feedback, PLUS ES recommends the procedure is renamed Shared Isolation Meter Replacement Procedure, to not constrain its application to a specific isolation methodology.
Chapter 11 – Savings and Transitional Rules	
11.[XXX].1 – Definitions	As per our feedback against Legacy Meter in Chapter10, PLUS ES recommends that the wording *'in operation'* is deleted from the definition. It is a subjective term and could have multiple interpretations such as: not energised, not malfunctioning etc. To meet the objective of introducing '*Legacy meter'* in the Rules, and to ensure these meters are scheduled and targeted to be

	replaced by smart metering, the definition *'Means any Type 5 and 6 metering installation'* is succinct and sufficient.
11.[XXX].2(c)(1)	PLUS ES recommends for flexibility, the range for the fifth Interim Period, should allow for a lower value, such as 10-15 percent. Reducing the number of legacy meters in the final Interim Period, will allow retailers and metering parties to focus a portion of their resourcing on attending LMRP sites which could not be successfully exchanged in previous years.
11.[XXX].3(a)(2)	*'(2) provide to Affected Retailers and Metering Coordinators a schedule specifying the Legacy Meters and corresponding NMIs to be replaced in each Interim Period under the LMRP;'* PLUS ES notes that the contestable MC will not have access to the NMIs until the Retailer nominates them in the role. We do not have access to this information unless we are current. There will be a volume of family failure legacy meters which will have a contestable MC in the role but for the bulk of the LMRP meters the MC will be the LNSP.
11.[XXX].11(a)(1)	As per the defect tracking and monitoring feedback provided in Appendix A – Section 6, PLUS ES recommends the following: • The clause is amended to apply this clause to <u>any</u> meter installation replacement not only for Legacy Meters. This process is beneficial and site defects can occur irrespective of the type of metering installation; • The nature of the defect is more beneficial to the market than the defect flag especially when liaising with the customer. A seamless and low-cost way of communicating the defect nature is via the Market Settlement and Transfer Solution. We support the replacement of the defect flag with the defect type and an allowance similar to 11.[XXX].10 is made to include this information as NMI Standing Data; and • The defect information access should be extended to any party which has a financial interest at the NMI; not only the FRMP. Additionally, having the MC update the information in MSATS and not having access to it, is inefficient.

11.[XXX].11(a)(2)	As per feedback provided in Appendix A - Section 6, PLUS ES does not support that the recording in MSATS of the defect issue date is an efficient or low-cost market process: • Placing a requirement for MSATS to maintain defect notice issue dates requires all market participants to build for this MSATS change and adds additional cost burden with no visible benefit to those participants; • To maintain the defect notice process in MSATS for all use cases would require a complex and costly build; and • Retailers currently manage their systems to maintain and record information about all the other notices they must issue to customers. The defect notice for market efficiency should follow a similar process.
11.[XXX].12(a) & (d)	PLUS ES recommends that the date which the market bodies are required to publish under the Rules and to consider the Amending Rule, be amended as per changes to the effective dates. That is, if PQD is postponed to July 2026, then those requirements identified in clause (a) must also have timelines reflective of the extended dates. Refer to our feedback on scheduled effective dates provided in Appendix A-Section 9.
11.[XXX].12(c)	*'Minor'* or *'administrative'* assessment whilst well intentioned could potentially create an impact to the market participants which the market bodies could not foresee. PLUS ES recommends that this clause is amended to indicate that 'minor' or 'administrative' changes follow the 'Minor' consultation process, as a mitigation to unintended downstream participant outcomes.
11.[XXX].13	In addition to the schedule effective dates feedback provided in Appendix A-Section 9, PLUS ES does not support the 22 January 2025 date for AEMO to develop and publish the Asset Management Guidelines. It is our assumption that the proposed type 8 & 9 metering[14], will also require amendments to the Guidelines and potential resubmission of the MC's AMS. Hence,

[14] AEMC consultation – Unlocking CER benefits through flexible trading

	for streamlined efficiency, we propose that the AEMC take both consultation requirements into consideration and: • Consolidate the amendments to one effective date; and • Defer the date to mid-2025 at a minimum, to ensure sufficient timing for consultation and resource availability for downstream impacts.
NERR	
59A	As per the PLUS ES feedback provided in Appendix A-Section 3. The clause should be amended to ensure this clause does not become a barrier to the timely replacement of metering installations where: • The customer has requested the metering installation, and agreed to an installation date which will not allow the receipt of the notice at a minimum of 4 business days prior to the meter installation date; and • The meter installation is an urgent/emergency requirement.
59A(3)(b)	As per the PLUS ES feedback provided in Appendix A-Section 3. Whilst the draft determination including previous metering determinations supported a date range for the Retailer notice – this has not been reflected in the draft rules. PLUS ES recommends for efficiency, field resourcing flexibility and increased social licensing (setting and meeting the customer expectations) that the clause is amended to read as per below: (b) the expected date or date range on which the Retailer proposes to replace the customer's *meter* and of any associated supply outage.
59AAA(2)	As per the PLUS ES feedback provided in Appendix A-Section 6. The draft rules allow for a customer to receive two notices. The information saved in MSATS is against the NMI and not the customer. The incoming Retailer can only tell if a letter previously has been sent to an NMI – not that it has been provided to a specific customer. Hence, the proposed defect Retailer notice process does not meet the two-notice requirement for the customer.

	Additionally, if the two-defect notice has been met and a customer moves into a site, that customer will not become aware of the defect. PLUS ES proposes that an additional sub clause is added to 59AAA(2) to require the current or incoming Retailer to recommence the defect notification process when they become aware that the customer at the site has changed.
91A (d)(i) &(ii)	The proposed amendments to NER Clause 7.8.10,7.8.10A, 7.8.10B, 7.8.10C have the shared fuse obligations removed and direct market participants to 7.8.10D – Shared fusing meter replacement procedure. PLUS ES recommends the following to align 91A(d) with those obligations: • Amending subclause (i) accordingly; • Deleting (ii); and • Retaining the text following sub clause(ii) as it remains applicable.