

24 October 2025

NEM Reform team
Australian Energy Market Operator
Level 12, 171 Collin Street
Melbourne VIC, 3000

Submitted via email: nem.retailprocedureconsultations@aemo.com.au

Dear NEM Reform team at AEMO,

Request to transition from expedited to standard Rules consultation - Retail and Metering Procedures 1 December 2025

AusNet welcomes the opportunity to submit feedback to the Australian Energy Market Operator's (AEMO) expedited consultation regarding the Retail and Metering Procedures proposed for 1 December 2025. We acknowledge the objective of expanding LMRP process requirements for defect reporting to non-legacy meters, including AMI and contestable Type 1–4 installations.

We have concerns that these expedited changes to the Retail and Metering Procedures may impose unnecessary costs on Victorian customers. Notably, the proposed scope exceeds that of the November 2024 National Electricity Rule change for accelerating smart meter deployment. As a Victorian distribution business, AusNet complies with existing Rule obligations by applying defect reporting for LMRP meters. Defect reporting for non-contestable metering does not pertain to retailers or other metering providers, and in our view, the proposed changes would not deliver market benefits in Victoria. Accordingly, we respectfully request that Victorian AMI Type 5 meters be excluded from these procedural amendments.

Accordingly, we suggest further industry engagement is necessary to fully assess the merits and potential impacts of the proposed changes, as well as to identify if other amendments may be required. The current expedited consultation process may not provide sufficient opportunity to evaluate the overall case for proceeding with these changes.

Therefore, we recommend that AEMO employ a standard rules consultation process rather than an expedited approach. This would allow for more comprehensive industry engagement, including a dedicated workshop for registered participants, service providers, and AEMO to consider impacts and explore alternative solutions.

We value AEMO's ongoing stakeholder engagement and its commitment to maintaining high-quality retail and metering procedures amidst significant volumes of rule and procedure changes supporting the renewable energy transition. Nonetheless, we believe that further consideration and industry input on this specific proposal are warranted to ensure the best outcomes for customers across all jurisdictions.

If you have any enquiries, please do not hesitate to contact Justin Betlehem on 0433691111 or justin.betlehem@ausnetservices.com.au.

Yours sincerely



Justin Betlehem
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AusNet