



# Retail and Metering Procedures 1 December 2025 consultation

Draft Report – Expedited consultation  
for the National Electricity Market

**Published: 10 October 2025**

[aemo.com.au](https://aemo.com.au)

New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

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## Explanatory statement and consultation notice

The publication of this draft report commences AEMO's expedited consultation to propose minor amendments to the Retail and Electricity Market Procedures (**REMP**) under the National Electricity Rules (**NER**).

This consultation is undertaken in accordance with the Rules consultation procedures as required by NER 7.16.1. AEMO considers that the expedited rules consultation procedure in NER 8.9.3 is appropriate to be applied in this consultation because the proposal is non-material for the following reasons:

- The proposed amendments will have minimal impact on the activities of the registered participants or other organisations to which the proposal relates. In particular, the proposed procedural changes do not require business to market system changes, including the way in which they send or retrieve information in MSATS.
- The proposed amendments will be made to existing procedures.

AEMO is proposing to amend its procedures to:

- Allow MSATS to record defects for non-legacy meters.
- Include a new enumeration in the Metering Installation Exemption Guideline.
- Include a new example CATS NMI Data Stream and CATS Register Identifier in Standing Data for MSATS for type 9 CMS metering installations.

AEMO's draft proposal (**Proposal**) is to amend the following **Procedure and documents** with a proposed effective date of:

### 1 December 2025:

- MSATS Procedures - Principles and Obligations for All Connection Points.
- Standing Data for MSATS.
- Metering Installation Exemptions Guideline.

### 31 May 2026

- Standing Data for MSATS.

## Consultation notice

If any person considers that AEMO should follow the standard (rather than expedited) consultation procedure for this proposal, they can submit a request for AEMO to do so (**procedure change request**) within 10 business days after publication of this draft report. Any procedure change request must be sent to [nem.retailprocedureconsultations@aemo.com.au](mailto:nem.retailprocedureconsultations@aemo.com.au) by 5:00pm (Melbourne time) on 24 October 2025. In accordance with NER 8.9.3(b)(2), a request must include reasons why the person considers the proposal is not a 'Non-material Proposal' as defined in NER 8.9.1 – that is, why it would be likely to have a significant effect on the NEM or on the activities of relevant registered participants.

AEMO invites written submissions from interested persons on this draft report and the draft proposal to [nem.retailprocedureconsultations@aemo.com.au](mailto:nem.retailprocedureconsultations@aemo.com.au) by 5:00pm (Melbourne time) on **7 November 2025**.

Submissions may include alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective in section 7 of the National Electricity Law. Please include supporting reasons.

Before making a submission (including a procedure change request), please read and take note of AEMO's consultation submission guidelines, which can be found at <https://aemo.com.au/consultations>. Subject to those guidelines, submissions will be published on AEMO's website.

Please identify any parts of your submission that you wish to remain confidential and explain why. AEMO may still publish that information if it does not consider it to be confidential but will consult with you before doing so. Material identified as confidential may be given less weight in the decision-making process than material that is published.

Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Interested persons can request a meeting with AEMO to discuss any particularly complex, sensitive or confidential matters relating to the proposal. Please refer to NER 8.9.1(k). Meeting requests must be received by the end of the submission period and include reasons for the request. AEMO will try to accommodate reasonable meeting requests but, where appropriate, we may hold joint meetings with other stakeholders or convene a meeting with a broader industry group. Subject to confidentiality restrictions, AEMO will publish a summary of matters discussed at stakeholder meetings.

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# 1. Stakeholder consultation process

As required by National Electricity Rules (NER) 7.16.1, AEMO is consulting on changes to allow MSATS to record defects for non-legacy meters in accordance with the expedited rules consultation procedure in NER 8.9.3.

Note that this document uses terms defined in the NER, which are intended to have the same meanings. There is a glossary of additional terms and abbreviations in Appendix A.

AEMO's process and expected timeline for this consultation are outlined below. Future dates may be adjusted, and additional steps may be included as needed, as the consultation progresses.

**Table 1 Consultation process and timeline**

Consultation steps	Dates
Draft report published	10 October 2025
Procedure change request deadline	24 October 2025
Submissions due on draft report	7 November 2025
Final report published	24 November 2025

AEMO considers that the expedited rules consultation procedure is appropriate for the proposal because it is not expected to have a significant impact on either:

- The NEM retail market or power system.

At any time before the final report is published and having regard to information received through submissions to this draft report, any procedure change requests under NER 8.9.3(b) or other developments, AEMO may decide to switch from an expedited to the standard consultation procedure by publishing a notice under NER 8.9.3(f).

AEMO's consultation webpage for the proposal is at <http://www.aemo.com.au/consultations/current-and-closed-consultations> which will contain all previous published papers and reports, written submissions, and other consultation documents or reference material (other than material identified as confidential).

AEMO presented the issue of defects for interval meters at the July ERCF and asked the members of the forum to provide feedback on the idea. All respondents endorsed extending defect coverage to interval meters, ensuring alignment with legacy meters by maintaining equivalent scope and enumerations, as documented in feedback following the July ERCF meeting.

AEMO thanks all stakeholders for their feedback on the proposal to date, which has been considered in preparing this draft report, and looks forward to further constructive engagement on the proposal.

## 2. Background

### 2.1. Context for this consultation

This consultation considers three matters:

1. Removal of the word 'legacy' in the defect fields in MSATS.
2. Changes to the Metering Installation Exemption Guideline to include a new exemption enumeration.
3. Changes to Standing Data for MSATS related to type 9 CMS metering installations

#### 2.1.1. Removal of the word 'legacy' in the defect fields in MSATS

The Accelerating Smart Meter Deployment (**ASMD**) rule change<sup>1</sup> accelerates the replacement of legacy meters and the installation of smart meters in the period between 1 December 2025 and 30 November 2030 in the National Electricity Market (NEM).

To achieve this objective the NER Rule includes a new defect management process. AEMO was required to amend the Market Settlement and Transfer Solution Procedures (MSATS) to specify:

- The information that must be recorded by a Metering Coordinator (MC) in MSATS where it identifies a defect at the metering installation during a site visit to replace a legacy meter<sup>2</sup>.

The NER Rule defines the new term 'defect at the metering installation' and includes a new obligation<sup>3</sup> for AEMO to allow a MC to record the nature of the defect in MSATS.

There is an opportunity to better align the definition of 'defect at the metering installation' definition and the MSATS procedures for the MC to notify a defect at the metering installation because:

- NER 11.117.12 only requires AEMO to amend MSATS to allow a defect identified during a site visit to replace a legacy meter to be recorded in MSATS.
- However, the definition of 'defect at the metering installation' does not refer only to defect identified in these circumstances or to legacy meters.

The MSATS Procedure and Standing Data for MSATS document, which were finalised for an effective date of 1 December 2025, only currently allow a defect to be applied against those metering installations which have a legacy meter. Participant feedback after the publication of the final report requested that a defect should be able to be applied for all meters.

Having regard to the broader definition and participant feedback, AEMO is proposing removing the word 'legacy' from the procedures as it relates to defects.

#### 2.1.2. Changes to the exemption guideline to include a new exemption enumeration

AEMO's package 2 consultation<sup>4</sup> considered the matters of the ASMD NER rule related to testing and inspection. In that consultation AEMO made changes to the Metering Installation Malfunction Exemption procedure for metering installation malfunctions to comply with new requirements of the ASMD rule.

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<sup>1</sup> <https://www.aemc.gov.au/rule-changes/accelerating-smart-meter-deployment>

<sup>2</sup> NER 11.177.12(a)(1).

<sup>3</sup> NER 11.177.12(a)(1).

<sup>4</sup> <https://www.aemo.com.au/consultations/current-and-closed-consultations/2025-metering-services-review-package-2>

AEMO's final report included the ability of an MC to apply for an exemption on the basis of a third-party dependency, however this type of exemption was not captured in the Metering Installation Exemption Guideline.

AEMO is proposing a new enumeration to allow an MC to choose 'third party' exemption.

### 2.1.3. Changes to Standing Data for MSATS related to type 9 CMS metering installations

In September 2025 AEMO finalised its procedure changes to implement the Unlocking CER benefits through flexible trading Rule 2024<sup>5</sup>. The Rule includes provisions for measuring energy from previously unmetered supply points, for example, street furniture connections (e.g. streetlights, EV chargers). AEMO is proposing a change to the Standing Data for MSATS.

During AEMO's consultation, SA Power Networks asked whether a Type 9 CMS metering installation with multiple measurement elements should be included in the MSATS Standing Data when no physical meter serial number exists.

AEMO is proposing to add two tables to account for the specific use case identified by SA Power Networks and where a CMS installation connects to one measurement element.

## 2.2. The national electricity objective

Within the specific requirements of the NER applicable to this proposal, AEMO will seek to make a determination that is consistent with the national electricity objective (NEO) and, where considering options, to select the one best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law as:

to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity with respect to:

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of the national electricity system; and
- (c) the achievement of targets set by a participating jurisdiction—
  - (i) for reducing Australia's greenhouse gas emissions; or
  - (ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.

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<sup>5</sup> <https://www.aemc.gov.au/rule-changes/unlocking-CER-benefits-through-flexible-trading>

## 3. Proposal discussion

AEMO is consulting on three separate items as part of this expedited consultation:

1. Removal of the word 'legacy' in the defect fields in the MSATS Procedures.
2. Changes to the Metering Installation Exemption Guideline to include a new exemption enumeration.
3. Changes to Standing data for MSATS to include a new table example for a use case related to type 9 CMS metering installations.

### 3.1. Description of proposals

#### Defect field in MSATS Procedures

Participant feedback after publication of the Metering Services Review Package 1 Final Report challenged AEMO's initial assessment that MCs can only record defects at metering installations for legacy meters.

Having reviewed the NER provisions and in response to participant feedback, AEMO has assessed that MSATS should enable MCs to populate the defect field for non-legacy meters. One Procedure and one supporting document is impacted to remove the current requirement that an MC can only apply a defect against a Legacy Meter.

- MSATS Procedures – Principles and Obligations for All Connection Points
- Standing Data for MSATS

#### MSATS Procedures – Principles and Obligations for All Connection Points

- AEMO proposes to change the Obligations by Role section 2.6 to ensure that, after any meter which had a defect recorded in MSATS is replaced, the current MC clears the Defect Flag, Defect Type and Defect Issuing MC.
- AEMO does not intend on changing the proposed system enhancement which clears the defect field when a CR 3004/3005 or 3090/3091 is used for legacy meters. A MC can clear the field via the CR 5300/5301 when a smart meter with a defect is replaced.

#### Standing Data for MSATS

- AEMO proposes to remove the word 'legacy' from the description of the Data Element Name of 'Defect Type' and remove the word 'legacy' from the description of table 34 – Defect at the metering installation.

AEMO propose to amend the MSATS Procedures and Standing Data for MSATS with an effective date of 1 December 2025.

#### Exemption Guideline

The package 2 consultation considered the matters of the ASMD rule of testing and inspection. In that consultation AEMO made changes to the Metering Installation Malfunction Exemption procedure for metering installation malfunctions to comply with new requirements of the ASMD rule. To facilitate these changes, the Metering Installation Exemption Guideline was updated to include the reasons why a MC can apply for an exemption via an enumerated list.

AEMO's final report included the ability of an MC to apply for an exemption on the basis of a third-party dependency, however this type of exemption was not captured in the Metering Installation Exemption Guideline.

AEMO are proposing to change the Exemption Guideline to include three new enumerations:

Category	Type	Nature
MALFUNCTION	WC_NMI	THIRD_PARTY
MALFUNCTION	LV_CT_NMI	THIRD_PARTY
MALFUNCTION	HV_NMI	THIRD_PARTY

The new enumerations will allow auto-approval for whole current NMIs and a maximum exemption period of 46 calendar days (30 business days).

AEMO propose to amend the Procedures with an effective date of 1 December 2025.

### Type 9 Metering installations

In September 2025 AEMO finalised its procedure changes to implement the Unlocking CER benefits through flexible trading Rule 2024. The Rule includes provisions for measuring energy from previously unmetered supply points, for example, street furniture connections (e.g. streetlights, EV chargers). AEMO is proposing a change to the Standing Data for MSATS.

During AEMO's consultation, SA Power Networks asked whether a Type 9 CMS metering installation with multiple measurement elements should be included in the MSATS Standing Data when no physical meter serial number exists. AEMO is proposing to add two tables to account for the specific use case identified by SA Power Networks and where a CMS installation connects to one measurement element.

## 3.2. Issues for consultation

AEMO sought feedback from Electricity Retail Consultative Forum (ERCF) on proposed Procedural changes for the defect field. AEMO received no dissenting views on the proposal.

### Questions

1. Do you have any comments to make in relation to the Proposal?
2. Are there any other comments you would like to make in relation to the Proposal?

## 4. Draft determination

### 4.1. Draft determination

AEMO has prepared a draft of the MSATS Procedures, Metering Installation Exemption Guideline and Standing Data for MSATS to reflect the Proposal, as published with this Draft Report in mark-up format from the current version.

AEMO's draft determination is to amend the documents in that form.

### 4.2. Effective date

AEMO's proposed effective date for the determination:

#### 1 December 2025

- MSATS Procedures – Principles and Obligations for All Connection Points
- Standing Data for MSATS
- Metering Installation Exemption Guideline

#### 31 May 2026

- Standing Data for MSATS

## Appendix A. Glossary

Term or acronym	Meaning
AEMC	Australian Energy Market Commission
ERCF	Electricity Retail Consultative Forum
FRMP	Financially Responsible Market Participant
MC	Metering Coordinator
NER	National Electricity Rules
NMI	National Metering Identifier
CMS	Central Management System