Legacy Meter Replacement Plan

June 2025

Endeavour Energy

POWER together

Contents

Acknowledgement of Country

Endeavour Energy acknowledges the Traditional Custodians of Country where we work – the people of the Dharug, Wiradjuri, Dharawal, Gundungurra and Yuin nations. We recognise their continuing connection to the lad, waters, and community and pay our respects to Elders, past and present.

1.Introduction

About us

Endeavour Energy is a licenced Distribution Network Service Provider (DNSP) responsible for planning, building, operating and maintaining the electricity distribution network across our defined distribution network area. We provide affordable, safe and reliable power supply to over 2.7 million people living and working in diverse environments and communities across Sydney's Greater West, the Blue Mountains, the Southern Highlands, the Illawarra and the South Coast.

The timely and efficient provision of these network services is fundamental to supporting employment growth, economic development and housing affordability across one of the fastest growing metropolitan and regional economies in Australia. The population of Western Sydney is expected to increase by 1,000,000 by 2036 and we expect to connect more than 20,000 customers each year.

To facilitate the energy industry transformation, we are transitioning from a traditional 'poles and wires' business to a customer-centred distribution system operator (DSO). We are working with customers and stakeholders to help deliver a clean energy future where smart meters, batteries and rooftop solar enable customers to generate, store and sell back electricity into the grid.

We are also responsible for reading and maintaining all type 5 and type 6 meters, also known as legacy meters, until they are replaced with a type 4 or type 4A smart meter. Following the Power of Choice reforms which introduced contestability in metering services, we no longer install or replace electricity meters. Instead, this work is the responsibility of the Metering Coordinator (MC) appointed to the respective connection point by the customer's electricity Retailer.

Figure 1: Endeavour Energy network area

Background

On 3 December 2020, the Australian Energy Market Commission (AEMC) initiated a review into the regulatory framework for metering services. The purpose of this review was to determine whether the Power of Choice reforms had met expectations and what changes were required to improve the efficiency and effectiveness of metering services, particularly in the context of other energy sector reforms where smart metering is expected to play an increasingly important role.

On 30 August 2023, the AEMC published their final report which included several recommended amendments to the metering framework to better enable consumers to access the many benefits smart meters can provide. Key recommendations included increasing the deployment of smart meters, improving customer and DNSP

access to smart meter data, and providing consumers with more information and a better overall experience when having a smart meter installed.

On 29 September 2023, the AEMC received a rule change request from Intellihub Australia, SA Power Networks, and Alinta Energy seeking amendments to give effect to many of the AEMC's recommendations. Following an extensive consultation process, on 28 November 2024 the AEMC published final rules which introduced a suite of changes to the metering framework. Some of the changes specifically designed to reduce some of the barriers currently inhibiting the installation of smart meters include:

- Developing a centralised plan to accelerate the deployment of smart meters to all small customers with a target for universal take up across all NEM jurisdictions by 2030.
- Removing the option for consumers to opt-out of a smart meter installation, with upfront charges or exit fees for meter replacements prohibited during the acceleration period.
- A prescribed process for replacing meters at shared fuse sites to improve installation efficiencies and minimise customer inconvenience from frequent or prolonged outages.
- Improving the quality of information provided to customers in advance of having a smart meter installed and a customer notification process where a site defect or issue prevents a successful replacement.
- Differentiating the replacement timeframes for individual and family meter malfunctions and additional requirements when applying for an exemption to these timeframes.

The AEMC has staggered the commencement of the numerous amendments to the National Electricity Rules (NER) and National Energy Retail Rules (NERR) to allow for implementation work that participants will need to complete to comply with the changes. Importantly, the current industry structure has been maintained meaning Retailers and MCs will remain responsible the provision of metering services to customers once their legacy meter has been replaced.

Roles and responsibilities

The NER establishes the Legacy Meter Replacement Plan (LMRP) as the mechanism to efficiently coordinate and deliver the accelerated rollout during the LMRP Period. This is defined as the five-year period from 1 December 2025 to 30 November 2030. The mechanism introduces new responsibilities for participants and requires industry collaboration to efficiently plan, deliver and enable the LMRP to achieve the 2030 target at the lowest cost to customers.

Figure 2: Overview of the LMRP process

Although not directly involved in the installation of smart meters, DNSPs are responsible for developing LMRPs setting out the replacement of legacy meters in accordance with an overarching design objective. The LMRP Objective is to replace all legacy meters with a type 4 meter in a timely, cost effective, fair and safe way during the LMRP Period.

The AEMC determined that DNSPs are best placed to fulfil this planning function as they have detailed information on the status and location of legacy meters, and can provide information and insights into the areas of their networks where customers would benefit from an earlier deployment of smart meters. Retailers are responsible for installing smart meters within the year, or Interim Period, allocated in the LMRP.

In developing their LMRPs, DNSPs are required to consult with affected parties. This obligation recognises Retailers and MCs in particular will play a critical role in achieving the replacement targets and provides them with an opportunity to provide their input to influence the design of the meter replacement schedule.

DNSPs must also develop LMRPs which satisfy the minimum content requirements set out in the NER. Information which must form part of the LMRP includes:

- A meter replacement profile which details the proposed groupings that are scheduled for replacement in each Interim Period, and the total number of meters to be replaced in each year and their corresponding NMIs.
- A description of the consultation process undertaken to develop the LMRP, including who was consulted and how, the concerns identified through consultation, and how the feedback has influenced the replacement plan.
- An explanation of how the replacement plan is consistent with the LMRP Objective and how the DNSP has had regard to the LMRP Principles.

In relation to the LMRP Principles, these have been designed to give DNSPs and affected parties the flexibility to co-develop LMRPs that considers and accommodates the circumstances within the respective network area while maintaining a focus on achieving the LMRP objective.

Purpose of this document

This LMRP outlines our plan to replace all legacy meters by the end of the LMRP Period. In accordance with NER requirements, we are submitting our LMRP to the AER for assessment. We have developed this plan through a collaborative process involving Retailers, MCs and key stakeholders and it is designed to support an orderly rollout that enables all eligible customers the opportunity to access a smart meter by December 2030 and benefit from the services they can provide.

Once approved by the AER, we will provide Retailers and MCs an updated schedule of replacements which provides the transparency needed to assist them to prepare, plan and prioritise their resources to achieve the LMRP replacement targets at lowest cost. It also provides them the opportunity to communicate with their customers and support them to make any preparations to facilitate the installation.

The NER specifies the consultation requirements and type of information DNSPs must include in their LMRPs. These requirements are grouped and discussed in separate sections of this document which has been structured to demonstrate to Retailers, MCs, the AER and other stakeholders that our LMRP complies with NER requirements.

Section 2: Overview of our meter replacements - Provides a summary of recent changes to our metering population and the number of planned meter replacements over the LMRP Period.

Section 3: Developing our LMRP - Discusses our LMRP consultation process, how we engaged with stakeholders and how the feedback we received was used to guide a plan that aligns with the priorities of stakeholders.

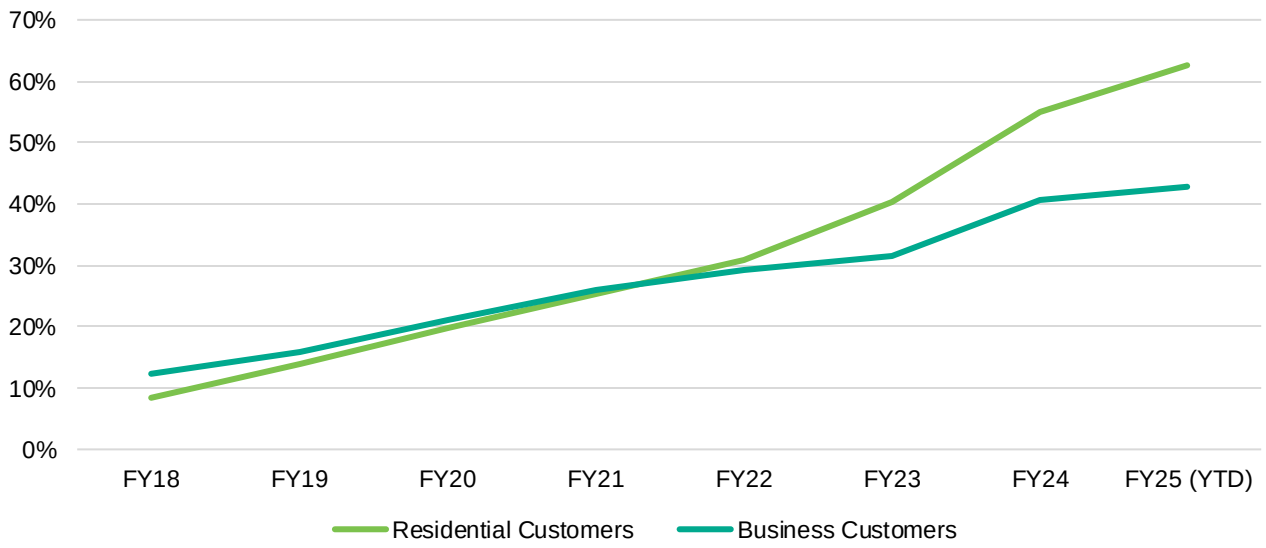
Section 4: LMRP Objectives and Principles - Demonstrates how we have considered each of the LMRP Principles and applied our judgement in balancing feedback to design a plan that is practical, achievable and consistent with the LMRP Objective.

2. Overview of our meter replacements

Our smart metering population

Since the Power of Choice reforms were introduced in 2017, we have observed a significant increase in the number of smart meters installed across our network. As of May 2025, 640,000 (63%) of our residential customers and 35,400 (43%) of our low voltage business customers now have smart meters.

Figure 3: Proportion of Endeavour Energy customers with smart metering



Following moderate and steady growth in the years after the introduction of metering contestability, smart meter installations have risen rapidly since 2022. This growth has been driven predominantly by the uptake of Consumer Energy Resources (CER) such as rooftop solar, batteries and electric vehicles (EVs) which, for most customers, necessitated an upgrade to smart metering. The combined impact of electricity price volatility, more affordable technologies and greater financial support through Government schemes has incentivised more customers to invest in CER. New connections and replacements of faulty legacy meters have also contributed to this increase.

Proactive meter replacements

Over the past three years, we have observed a concerted effort by many Retailers to increase the number of proactive smart meter installations. Competitive pressures, increased resourcing and improved capabilities have likely contributed to this uplift in replacements. We understand the impending LMRP framework has also been a key driver as Retailers seek to manage their compliance risk by reducing the number of sites included in the LMRP which they would otherwise be obligated to replace under new NER requirements.

To support Retailer efforts to replace smart meters ahead of the LMRP Period, we have sought to guide the pre-LMRP rollout in a targeted and coordinated way. For instance, in accordance with our Australian Energy Market Operator (AEMO) approved 2023-28 Metering Asset Management Strategy (MAMS), we issued approximately 140,000 Meter Fault and Issue Notifications (MFIN) to initiate the replacement of legacy meters over 40 years old and approaching the end of their service life.

Retailers have generally made significant inroads in replacing these aged meters, with approximately 93,000 or 67% of these MFINs completed to date. Retailers continue to steadily progress through their allocated MFINs and we expect that a high proportion of these targeted replacements will be completed by the start of the LMRP Period. We have included MFINs which have not yet been completed in the LMRP replacement schedule to ensure a replacement will be attempted during the LMRP Period, if not before.

We continue to monitor Retailer progress on these replacements and offer our assistance where possible to facilitate pre-LMRP period replacements to lessen workload pressures during the LMRP period. Also, we will

continue to explore ways to assist Retailers to complete replacements at sites with known access issues or complex customer needs before 1 December 2025 to reduce the likelihood of encountering issues during the LMRP period that may disrupt the rollout or adversely impact customer outcomes.

LMRP replacement profile

Our meter replacement schedule has been guided by stakeholder feedback and provides for the replacement of our fleet of legacy meters throughout the LMRP Period. Replacements have been organised in geographic groupings based on meter reading routes to best allow Retailers and MCs to achieve scale efficiencies. Each Interim Period includes a mix of regional and metropolitan locations to deliver a consistent churn across all our network regions and assist Retailers and MCs to plan and manage their labour resources throughout the LMRP Period.

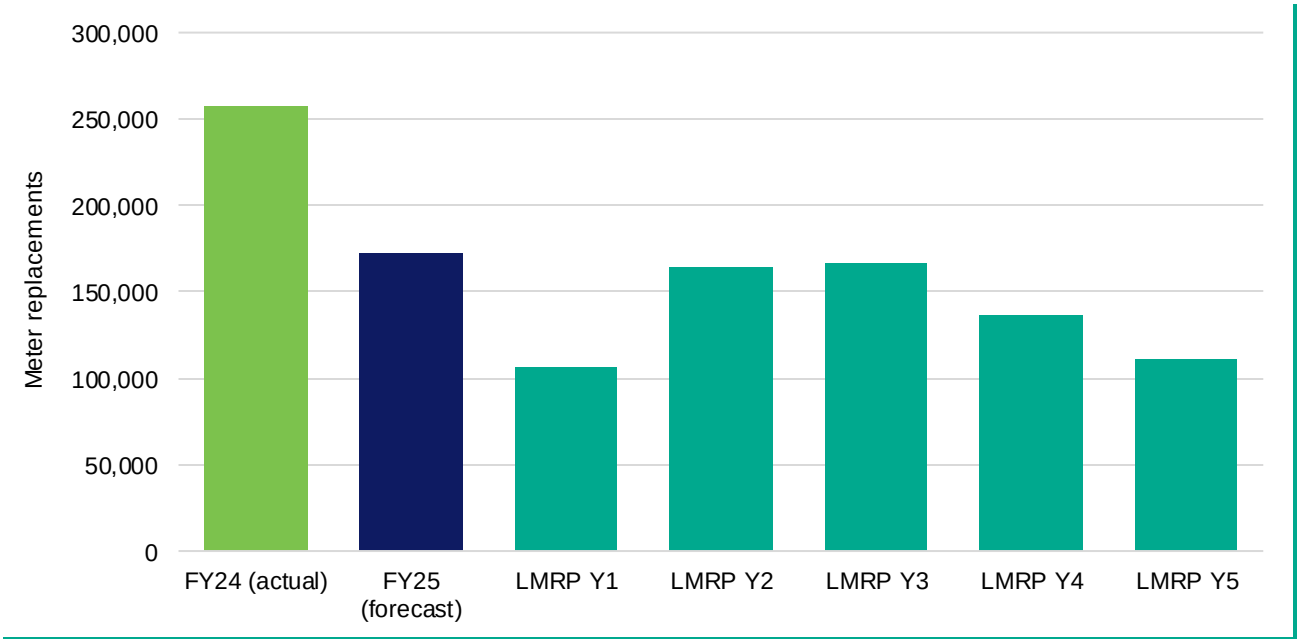
We expect a portion of these meters will be replaced prior to the commencement of the LMRP Period (1 December 2025). Meter replacement schedules will be adjusted to account for these replacements when we record LMRP schedules in the Market Settlement and Transfer Solution (MSATS) by 27 November 2025, in accordance with relevant procedures. Our meter replacement profile for each year of the LMRP Period is outlined in Table 1 below with volumes current as of 1 June 2025. A breakdown of replacements by network region and the meter reading groups targeted for replacement in each Interim Period provided in Appendix A.

Table 1: LMRP replacement profile

	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Meter replacements	105,924	164,338	166,790	137,069	111,603	**685,724**
Corresponding NMIs	62,853	104,870	106,327	92,989	74,039	**441,078**

To gauge whether the annual replacement targets are reasonable and could be delivered by Retailers and MCs, we have had regard to how our forecast replacement volumes compare with recent meter churns in across our network area. As shown in Figure 4, the required replacement volumes during the LMRP Period peak at levels significantly below actual replacements completed in FY24 and at approximately the same level meters are forecast to be replaced for FY25. Notwithstanding site specific constraints which may impede an installation, this suggests it is reasonable to expect the LMRP targets can be achieved using existing contingent labour resources.

Figure 4: Actual and forecast legacy meter replacements



3. Developing our LMRP

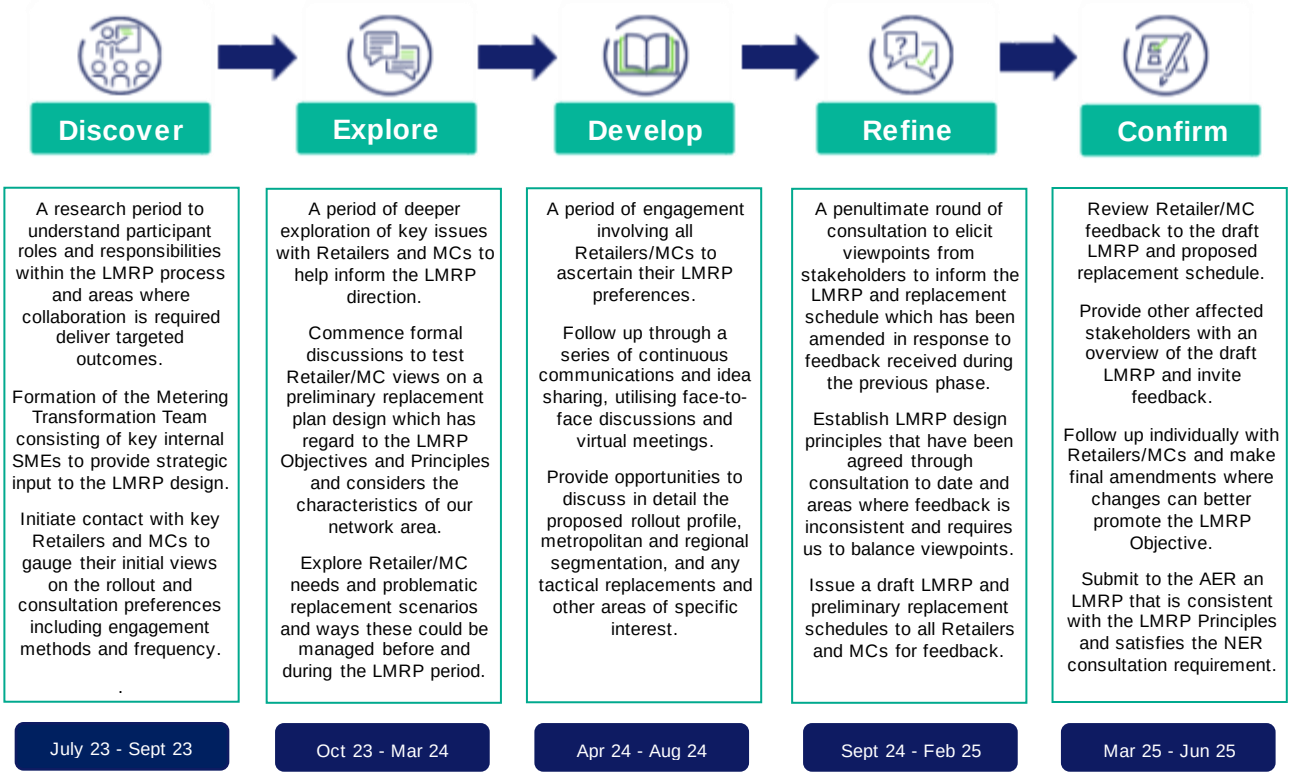
LMRP consultation process

Our goal has been to develop a meter replacement plan that is consistent with the LMRP Objective and LMRP Principles. To ensure our plan provides the optimal pathway to replacing all legacy meters by 2030, it also needs to consider how stakeholders could be impacted by the accelerated rollout. To help us gain an understanding of these impacts, we embarked on a consultation process which involved engagements with a variety of key stakeholders, providing them with a genuine opportunity share their feedback and shape the design of the meter replacement schedule.

Our 2024-29 regulatory determination process demonstrated the value of early engagement and the positive outcomes which can be achieved when stakeholders are involved and their views gauged from the beginning.

Following through with our commitment to embed quality engagement as a business-as-usual (BAU) process, we developed a consultation framework comprising of five key phases, each with a distinct focus and deliverables. The framework was developed during the AEMC's metering review and commenced consultation shortly after the review was completed, in anticipation of the recommended LMRP mechanism being confirmed via a rule change.

Figure 5: LMRP development framework



Affected stakeholders

Our early consultation focus was to gain a better understanding from key stakeholders of the practical barriers and challenges of the acceleration program and their respective views on an LMRP design that would enable the rollout to be delivered successfully. In their metering review draft report, the AEMC outlined their expectation in relation to which stakeholders should be consulted:

> *While DNSPs have the best information about the status and location of legacy meters within their areas, retailers and metering parties are best placed to plan, manage and resource the deployment of smart meters. The Commission considers that it is important for these parties to have strong input in developing the Plan so that the accelerated deployment can be conducted in a structured, efficient and cost-effective manner.*

Consistent with this advice, we targeted our consultation efforts on identifying the priorities and preferences of Retailers and MCs. We determined that maintaining a collaborative approach would best guide the development of a plan that could be broadly endorsed by Retailers and MCs by ensuring it is aligned with their resourcing preferences and ability to achieve the proposed annual targets as set out in the replacement schedule.

We adopted a proportionate approach to engagement, working intensely with industry stakeholders most impacted by the accelerated deployment program. Recognising accountability for performing the vast majority of LMRP replacements are concentrated across a handful of providers, we engaged most frequently with a select group of six Retailers (responsible for approximately 90% of our legacy meter population) and three MCs from the outset of our LMRP development. We considered the feedback and positions expressed by businesses in this key group would be sufficiently representative of the views held by their respective peers to guide the direction of the LMRP.

Figure 6: LMRP development key stakeholder group

We have been mindful of the need to involve and invite feedback from other Retailers and MCs who might face particular challenges and have unique LMRP design preferences to support their efficient participation in the rollout. In accordance with our LMRP development framework, all Retailers were approached for their feedback during the 'Develop', 'Refine' and 'Confirm' stages.

Whilst we have predominantly focussed on consulting with stakeholders individually, we have also engaged with Retailers collectively through our Retailer Reference Group (RRG), which was a quarterly forum hosted by Endeavour Energy Executive Managers to build our relationship with Retailers and provide an opportunity to work cooperatively on topical issues in a workshop-style setting. We have also worked alongside Retailers and MCs through AEMO's Metering Services Review Working Group which is tasked with analysing the business and system changes required to support the AEMC's rule change.

Aside from Retailers and MCs, we have also consulted with other affected parties. For instance, LMRP preferences were discussed during our periodic BAU meetings with industry bodies including the National Electrical and Communications Association (NECA) and the NSW Energy and Water Ombudsman (EWON). We have also actively engaged with other DNSPs to discuss the progress of our respective LMRPs to identify opportunities to better support the rollout or aspects of the LMRP design where stakeholders have provided consistent or contrasting feedback which might warrant further investigation.

In December 2024, we discussed the progress of our LMRP with the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) who were supportive of the policy objective of achieving universal access to smart meters for households and small businesses. NSW DCCEEW supported our proposed replacement profile and complemented the cooperative approach and direction we have taken to develop our LMRP.

In February 2025, we also briefed our Peak Customer and Stakeholder Committee (PCSC) on our LMRP design and development with the aim of gathering viewpoints from a customer perspective. In June 2025 the PCSC were given an opportunity to preview our LMRP. They offered positive feedback and commended our consultation process and the quality of our LMRP document, and provided their endorsement on the basis it demonstrably satisfies the LMRP Objective and LMRP Principles.

Engagement activities

During the 'Discover' phase, Retailers and MCs indicated they favoured utilising existing contacts and communication channels in lieu of developing an extensive engagement program which is typically more suited to achieving deep and broad engagement with a diverse cross-section of customers and stakeholders.

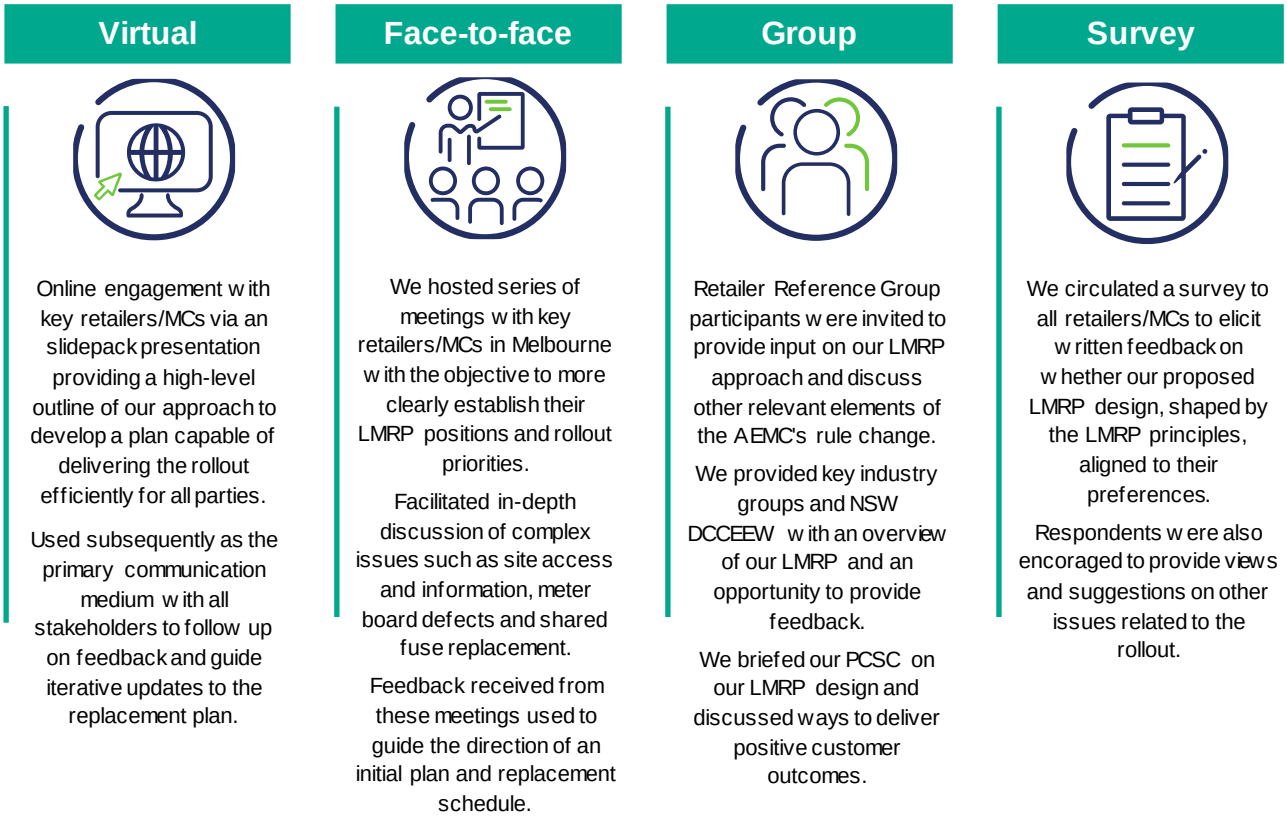
Our proportionate and targeted engagement approach has facilitated open, direct and constructive discussions on potential barriers to the accelerated rollout and other aspects of the AEMC's final rule. Engaging directly with key Retailers and MCs has enabled our initial LMRP positions to be tested and refined and allowed a general consensus to be reached relatively early on key LMRP design elements.

Engagement activities have often been led by our senior managers and attended by experienced personnel from our metering division. The involvement of subject matter experts has allowed a detailed exploration of a variety of technical and operational issues that could arise across a range of scenarios that might present a challenge during installation and risk not achieving the universal deployment target.

To present our LMRP design and elicit stakeholder feedback, we used a combination of virtual and face-to-face meetings. Virtual meetings were considered the most convenient engagement method and used frequently to facilitate stakeholder participation and a dynamic exchange of ideas and views. Verbal responses and stated positions and preferences were recorded at each engagement session and used as input to the guide the LMRP design.

Online and in-person meetings with individual Retailers and MCs were supplemented with group-based engagement which utilised existing forums with key stakeholder cohorts. We also surveyed Retailers and MCs and ascertain views on key aspects of the LMRP where these had not been recorded in previous engagements and their positions remained uncertain.

Figure 7: LMRP engagement methods



Our LMRP design and meter replacement profile as outlined in this document has been informed by the discussions and feedback we have received from these engagements. Engagement and development of the LMRP will be ongoing until mid-2025, providing us with better clarity of stakeholder views and potential refinements prior to submission of the LMRP to the AER for approval.

Incorporating feedback

The NER requires us to describe the concerns identified by stakeholders through our LMRP engagement and explain how these have been addressed. Below is a high-level overview of what we heard from our stakeholders and how we have responded in the LMRP.

Table 2: Summary of engagement feedback and response

Priority area	What we heard	How we have responded
Replacement rates 	Retailers and MCs supported a simple and consistent replacement profile within the boundaries set by the LMRP Principles to facilitate their resource planning and preparations for a steady and predictable volume of field and administrative support work until 2030. Some Retailers acknowledged there could be value in setting a variable replacement rate to help them manage unforeseen issues arising in the first year of the rollout and avoid the risk of non-compliance to annual replacement targets, amid concerns that they could still encounter a material step-up in replacements volumes under a flat LMRP profile that maybe difficult to manage.	Our LMRP has been amended to provide all Retailers and MCs the best opportunity to prepare for the transition and achieve replacement targets. We reworked our meter replacement profile which initially proposed to replace a fixed proportion of our metering population in each year, consistent with the methodology for forecasting our metering opex in our 2024-29 regulatory determination. Our LMRP now provides for the lowest permissible replacement volumes in Year 1 and Year 5. A gradual increase allows for the scaling up of operations as efficiencies are gained, while the decrease toward the end of the period can help Retailers and MCs to manage the final phase of the rollout.
Geographical group 	Retailers and MCs all agreed the LMRP should maximise geographical efficiencies and supported our proposal to progressively schedule replacements based on their meter reading routes. Some Retailers desired greater transparency of meter reading routes and requested we provide them with reading maps to assist them to efficiently plan the order of replacements within these defined network areas. One Retailer asked whether it was possible to provide a planned group isolation schedule to assist in planning replacement for shared fuse sites.	Our LMRP assigns replacements across our network area according to their meter reading route. Our LMRP can be sequenced into quarterly schedules to help inform Retailers and MCs on how they can proceed with an orderly replacement along meter reading routes to minimise cost and optimise rollout efficiency gains. Replacing meters in accordance with quarterly schedules is optional and will be provided to Retailers on request via a spreadsheet. We are not able to schedule group isolations ahead of time but note that replacing meters in accordance with quarterly plan can spread replacements at multi-occupancy and shared fuse sites and better equips us to assist with complex isolations and any emergency response needs that may arise, and minimise the number of estimated reads.
Urban/rural mix 	Retailers and MCs supported a balanced split of high density and regional replacements across the LMRP Period. They agreed that a consistent composition of urban and rural replacements in each year provides Retailers and MCs the ability to utilise local workforces. Stakeholders did not nominate a specific area, town or community be prioritised in the plan although many agreed that the plan should consider network investment needs and schedule replacements where they can avoid costly system upgrades. One Retailer suggested the complexity of the rollout could be reduced if newer areas were separated from older sites which are more vulnerable to site safety and technical defects and could be managed later in the rollout.	Our meter replacement schedule has been developed by including meter reading routes from each of our meter reading divisions to achieve a diverse and consistent mix of metropolitan and regional areas across each LMRP year. This approach promotes a fair and equitable rollout and provides customers an equal opportunity to access benefits of having a smart meter, irrespective of where they live or the age of their house/building Our LMRP also coordinates replacements in areas where smart meters can provide data we can use to improve network planning and operation and can provide a more contemporaneous and cost-effective alternative to like-for-like replacements of network assets.
Pre-LMRP replacements 	Several Retailers indicated they were aiming to complete a substantial portion of their respective metering upgrades before the start of the LMRP Period and supported our proposed use of MFINs to retire end-of-life meters to help achieve these targets. Retailers also identified estimated meter reads and managing customer complaints as key matters that	We have issued MFINs for old legacy meters (40+ years) and anticipate the vast majority of these will be completed prior to the LMRP Period. Outstanding MFINs have been included in the LMRP and grouped with other meters that fall into the same meter reading route to avoid repeated field visits to the same geographical area.

	would need to be managed during the LMRP period. To limit these, they suggested the period prior to 1 December 2025 should be utilised to also target replacements at sites with chronic access issues and life support customers. There was support for expanding the MFIN mechanism to initiate these more problematic replacements but there was some uncertainty over how incomplete MFINs would be followed up and included in the LMRP.	We remain open to working with interested Retailers to apply the MFIN mechanism for sites with persistent access issues and complex needs and facilitate access to enable these replacements. In collaboration with Retailers, we have developed a comprehensive information factsheet designed to enhance customer awareness of the rollout. In conjunction with the industry-wide communication campaign being led by the AEMC, this will improve customer rollout experience and reduce the likelihood of customer complaints and improve site access issues which may otherwise prevent a successful replacement.
Site information 	Several Retailers and MCs noted they typically have limited access to site specific information which they suggested is critical to the success of the rollout and could assist in ensuring the safety of field workers and avoiding wasted site visits. Some Retailers requested we utilise meter reading resources to capture useful site data (dog, locked access, hazards, meter board location etc.) and provide them with this information ahead of the LMRP period. Locked meter boards were considered to present a major obstacle and requested that MCs be provided network keys, noting DNSPs in other jurisdictions have either granted or are considering access to manage these issues.	We are screening site information we have recorded in our metering systems and once the accuracy is validated by our meter readers, we will provide these to Retailers and MCs. We are also working to identify sites with locked meter boards and examine ways to replacements at the sites can proceed. Our customer agreements restrict us from providing keys to third parties to access locked meter boards for the purposes of installing a meter. Also, the locking system used to secure metering installations is also used to gain entry to several restricted network sites. Our obligations to maintain the security of critical network infrastructure prevents us from sharing keys with MCs.
Shared fuse sites 	Many Retailers and MCs raised concerns about how replacements at shared fuse sites would be managed, with uncertainty about participant roles and responsibilities and whether the AEMC's proposed 'one-in-all-in' approach represented the most efficient arrangement in all scenarios. There was a desire for greater transparency of these sites to prevent wasted site visits and support for a simple approach for isolating simple shared fuse sites affecting few customers. Some Retailers wanted clarity over which party would be expected to coordinate isolations for commercial customers.	We will arrange shared fuse isolations in accordance with the new shared fuse replacement procedures in the NER. We do not have accurate information on shared fuse sites but have sought to balance workloads for all parties involved in the "one-in-all-in" process by spreading replacements in metropolitan regions which likely host most of our potential shared fuse sites across the LMRP Period. We are open to working with Retailers and MCs to identify opportunities to minimise disruption and inconvenience to large commercial businesses and other sensitive customers (e.g. aged care, emergency services, medical precincts) impacted by a shared fuse isolation.

Draft LMRP consultation

In accordance with our LMRP consultation requirements, on 28th February 2025 we circulated a draft LMRP and preliminary meter replacement schedules to all affected Retailers and MCs and invited their feedback. Following this, between 1 - 4 April 2025 we attended a series of in-person meetings with several Retailers and MCs to discuss the draft plan and other issues pertaining to the meter rollout. The main purpose of these meetings was to:

- ensure we captured their feedback and explain how this was incorporated into the LMRP;
- confirm support for the replacement schedules and the approach taken to develop them; and
- allow sufficient time to consider any amendments prior to submitting a final LMRP to the AER.

Retailers and MCs reaffirmed their support for our meter replacement profile and route-based approach underpinning their meter replacement schedules. Several Retailers indicated they are focussed on delivering the rollout quickly and aim to proactively replace meters in advance of the timeframes assigned in the LMRP.

Consequently, our LMRP is broadly consistent with the draft version circulated to Retailers and MCs, with updates made to the replacement schedules to account for meter replacements completed since February

2025 and the inclusion of outstanding MFINs which have been prioritised for replacement early in the LMRP Period.

Whilst these meetings established consensus support for our LMRP, they were dominated by discussion on a variety of challenges and scenarios Retailers and MCs expected to encounter in delivering the rollout. Of the challenges discussed, many were keen to further understand ways Endeavour Energy could contribute to alleviating three key constraints to improve their prospects for a successful replacement. These constraints and our responses to them are outlined below.

Provision of site information

Retailer/MC feedback: Many reiterated access to up-to-date information on site conditions is needed to ensure metering parties are adequately prepared and to reduce the likelihood of wasted site visits. Some commended our initiative to collect site information through scheduled meter reading and wanted clarity on the types of information being collected and how it would be provided.

Response: Our meter readers record site information pertaining to meter board access where relevant. However, they are not qualified to perform detailed technical meter board assessments so site information collected will be at a relatively high-level and capture observations made during a meter read. Information will be screened, collated and input to MSATS and among other things may include a description of unique site characteristics, safety hazards, meter board location and issues preventing an actual meter read. We are collecting site information on a best endeavours basis and cannot guarantee its accuracy at the time of replacement and consider it not suitable to be relied on to trigger the defect notification procedure in the NERR in lieu of defects and access issues being confirmed by an MC site visit.

Access to locked meter boards

Retailer/MC feedback: Some indicated meter board secured with locks is a key reason for failed replacements and suggested it would be difficult for technicians to promptly gain access from customers. It was noted that other DNSPs were trialling arrangements to enable participant MCs to access network keys and requested Endeavour consider adopting a similar approach.

Response: Our regulatory obligations and contractual agreements with customers prevent us from issuing security keys to MCs. However, we will closely monitor the progress and effectiveness of the initiatives undertaken by other DNSP and examine whether they can be adapted to our circumstances. In the interim, we are conducting an audit of sites with locked meter boards and believe this visibility could be used by Retailers to advise identified customers of their responsibility to provide access to their meters in conjunction with, or separate to, the meter deployment notification requirements set out in the NERR. For sites where network locks prevent access, Retailers also have the flexibility to request our “Unlocking secured electrical installation” ancillary network service (ANS) whereby our officers will provide access at a pre-arranged date and time.

Shared fuse replacements

Retailer/MC feedback: Some stakeholders suggested that we should perform detailed scoping of shared fuse sites when planning a group isolation to ensure that meter board defects are identified prior to their technicians attending the site. Some also desired clarity over how ‘one-in-all-in’ (OIAI) replacements will be grouped and coordinated where a large site requires a multiday outage.

Response: The shared fusing meter replacement procedure was developed by the AEMC following extensive industry consultation with DNSP, Retailer and MC responsibilities clearly set out in the NER. We consider safe and efficient outcomes can best be achieved by following these procedures. We will comply with our obligations to scope sites as necessary to arrange a planned interruption where a shared fuse site is identified by an MC site visit and remain committed to assisting and cooperating with MCs in relation to planned interruptions, as required by 91A of the NERR. In relation to multi-day isolations, we see merit in grouping NMIs by Retailer to optimise efficiencies but note that retailer churn after an isolation is scheduled may disrupt an orderly replacement of meters. We will continue to work with Retailers to work through the most efficient method of scheduling outages and would be supportive of AEMO developing a standard approach or guidance that can be applied consistently across all DNSP regions.

Ongoing engagement

Although we are not directly responsible for installing smart meters, we are committed to continuing engaging with Retailers and MCs during the LMRP Period to identify ways we can offer our support to ensure they have the best opportunity to successfully and safely replace meters. Our ongoing engagement throughout the smart meter rollout will be consistent with our goal of embedding genuine and high-quality engagement as a core BAU function and will align with our pledge to strengthen our relationship with Retailers as outlined in our Service Commitment for Retailers.

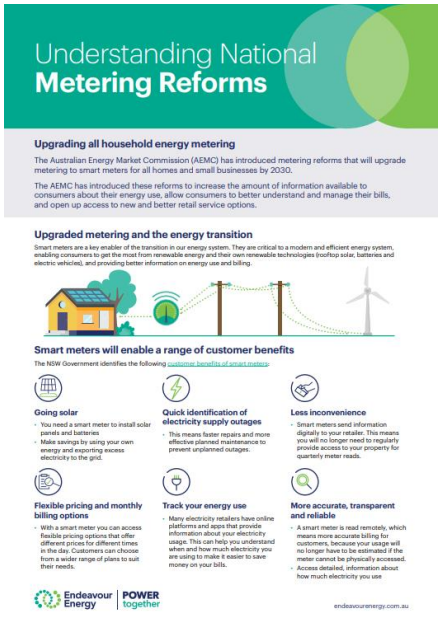
To support the LMRP, we will leverage our existing engagement activities in the following ways:

- We currently host routine monthly and quarterly meetings with Tier 1 and Tier 2 Retailers respectively. An LMRP-specific agenda item will be added to these meetings enabling a detailed review and discussion on issues pertinent to the smart meter rollout, including managing chronic no access sites, OIAI process refinements, MFIN completion & Service Order (SO) management. We will also continue to meet with other Retailers on an ad-hoc basis to discuss issues pertinent to the rollout. We are also investigating the feasibility of developing a digital dashboard capable of monitoring progress of the LMRP across a range of metrics with the intent of sharing insights with Retailers to help identify trends or specific issues that may require further attention and collaboration.
- We are proposing to uplift our BAU engagement with MCs/MPs. We will soon commence meeting directly with Intellihub on a quarterly basis with intent to organise routine one-on-one engagements with other major MCs. In addition, we have scheduled a workshop in mid-2025 with the other NSW DNSPs (Ausgrid and Essential Energy) and major MCs/MPs (Intellihub, PlusES, Bluecurrent and Yurika). The intent of this workshop is to collaborate on opportunities to establish clear, safe and efficient work processes related to the OIAI process which can be flexibly applied in a variety of circumstances and scenarios. The workshop will build on progress made in the initial workshop held in mid-April 2025 and, depending on MC/MP preference, may be followed by additional workshops. We will continue to use our annual consultation roadshow in Melbourne as a collaborative platform to engage directly and openly with Retailers and MCs on the implementation and progress of the LMRP.
- Our metering SMEs currently meet with their Ausgrid and Essential Energy counterparts on a monthly basis. We will use these meeting to evaluate opportunities for greater consistency and alignment on how the OIAI process can be facilitated by the NSW DNSPs. We will also use our meetings with the NSW DCCEEW to discuss the progress of the metering reforms and advocate for changes where legislation/regulation is a barrier to replacement. We will be an active participant in helping shape the development and design of any NSW Government-led arrangements to support customers to rectify any meter board faults or hazards that prevent the install of a smart meter.

We have already commenced actions to support the rollout by targeting improvements to site access for MPs. From April 2025 we instigated a mailout to building managers of multi-occupancy sites which have had chronic no access issues. These sites are predominately secure residential apartments where access to meters has been restricted due to a security door at the building entrance or the meter room.

The letter sent to building managers requests their immediate assistance in ensuring safe and unhindered access to meters. Gaining this cooperation is crucial for resolving access issues promptly and ensuring a safe and efficient meter exchange during the LMRP Period.

In addition, we have refreshed the content on our website to ensure customers and stakeholders can access relevant and up-to-date information relating to metering reforms and the LMRP rollout. For instance, customers can access a comprehensive smart meter fact sheet which was developed in collaboration with Retailers, EWON and the Justice and Equity Centre (JEC). We will review and revise our website routinely during the LMRP Period.



4. LMRP Objective and Principles

The regulatory process which established the LMRP mechanism was guided by a broad, overarching objective to encourage the timely, efficient, fair and safe deployment of smart metering to all homes and businesses. Promoting this, the LMRP Objective, has been our central focus in developing a meter replacement plan in collaboration with stakeholders.

Our LMRP provides customers the opportunity to have a smart meter installed by 1 December 2030 and reflects the feedback we have received from affected stakeholders, with careful consideration for the LMRP Principles in accordance with the requirements set out in the NER. Whilst stakeholders generally expressed consistent views and preferences on key matters, where these have differed, we have applied our reasonable judgment to balance diverse stakeholder views against the practical needs and requirements from a rollout design that best promotes the LMRP Objective.

Our regard for the LMRP Principles ensures that our LMRP is cognisant of a variety of operational matters that could be encountered during the rollout. We are sensitive of the need to provide Retailers and MCs the opportunity to manage their resources to successfully deliver replacements in accordance with the LMRP and enable our mutual customers to access and share in the benefits provided by their new smart meters.

In the following sections we outline how we have had regard to each LMRP Principle and the various matters we considered to inform our proposed replacement schedule.

LMRP Principle 1

The number of legacy meters planned for replacement in each Interim Period should be between approximately 15–25 per cent of the total number of legacy meters required to be replaced under the LMRP.

This principle provides the flexibility to set a consistent or variable meter replacement target for each year of the LMRP Period within the specified boundaries.

It was highlighted during consultation that variable annual targets requiring fewer replacements at the start of the LMRP Period could enable Retailers and MCs sufficient time to ramp up their capabilities. However, as previously discussed, several Retailers have already made the requisite adjustments enabling them to increase the volume of meter replacements in advance of the LMRP period. Preparations have been further aided by the AEMC's decision to defer the LMRP commencement date to 1 December 2025.

Furthermore, a variable schedule that replaces a large proportion of the fleet towards the end of the LMRP period may impact the likelihood of the deployment target being achieved. This is because it would create additional risk that Retailers and MCs will not have enough time to address unforeseen issues by the end of the acceleration period, exposing them to additional reporting burdens and potentially non-compliance.

It was widely accepted during the AEMC's metering framework review that universal deployment of smart meters by 2030 will not be achievable in practice due to barriers in undertaking successful meter replacement that can leave a proportion of upgrades unable to be completed. Whilst it is difficult to estimate the portion of unsuccessful smart meter installations, we expect these will be mainly due to difficulties in gaining site access or where defects have not been remediated. Given this, an effective LMRP may need to recognise that later years may require additional work at sites with complex access and remediation issues.

With these issues in mind, we sought stakeholder feedback on the following replacement profile options:

- Option 1: A consistent 20% replacement target for each year of the LMRP period.
- Option 2: A consistent 25% replacement target for the first four years of the LMRP period with no replacements allocated to the final year which instead would be dedicated to performing meter replacements that could not be completed in prior years as planned.
- Option 3: A variable profile with lower replacement targets for the first and final years of the LMRP, with higher targets set across the years in between.

There was near unanimous support for Option 3 among Retailers and MCs, on the basis it provides them with greater flexibility to focus their efforts and resources on completing replacements at problematic sites towards the end of LMRP Period and improves the prospect of achieving their LMRP targets. Many also valued lower targets in the first year to better manage LMRP implementation challenges, noting the framework provides other Retailers wishing to replace meters above their allocated annual target with the flexibility to proactively replace meters assigned for replacement in future years.

Our meter replacement schedule has been developed to align with stakeholder preference for Option 3.

Table 3: LMRP replacement profile options

Replacement profile	Year 1	Year 2	Year 3	Year 4	Year 5	Compliant with LMRP Principle 1	Stakeholder support
Option 1	20%	20%	20%	20%	20%	✓	✗
Option 2	25%	25%	25%	25%	0%	✗	✗
Option 3	15%	25%	25%	20%	15%	✓	✓

LMRP Principle 2

DNSPs should have regard to the overall efficiency of the LMRP, including costs and potential cost savings for affected market participants.

This principle recognises that replacing meters in geographical groupings can deliver scale economies and cost savings that would not be possible if planned replacements were more broadly dispersed across our network. Our stakeholder engagement confirmed that a transparent, area-based replacement schedule would help Retailers and MCs to plan and coordinate their labour workforce and meter supply requirements to deliver the rollout at lowest cost.

Furthermore, an approach which allows Retailers and MCs to focus their LMRP resources within geographically defined areas could reduce the challenges of delivering the rollout in parallel with obligations to install meters outside the LMRP mechanism (e.g. customer requests, new connections, CER installations etc.) which must be completed within specific timeframes set out in the NER.

During consultation we indicated that grouping meters by reference to their scheduled reading maps would facilitate route optimisation, enabling existing meter routes to be materially shortened or avoided altogether. Relative to other prospective groupings, this could significantly reduce meter reading costs and deliver cost savings to customers. In the absence of route optimisation, meter readers may still need to travel past the location of meters that have been replaced, delivering no material reduction in the cost of completing those routes and instead increasing per unit reading costs.

Retailers and MCs unanimously supported our proposal to group meter replacements by their reading routes which we have subsequently adopted in developing our replacement schedule.

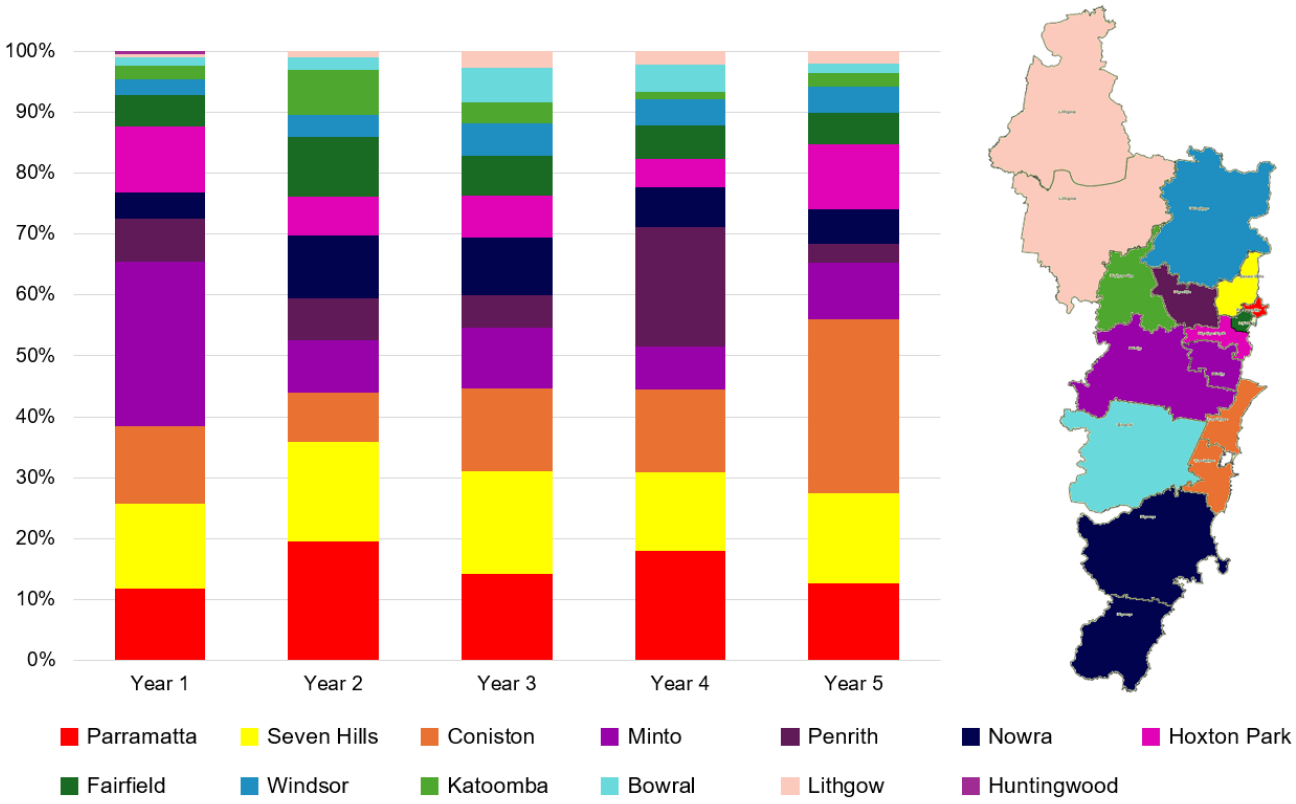
We have identified the routes which have meters that are known to be faulty or have reached the end of their economic life and have been flagged for replacement through the MFIN procedure but have not yet been replaced. Meters in these routes have been prioritised earlier in the LMRP period. Prioritised route retirements include a mix of metropolitan and regional areas noting that individual routes often have unique challenges.

Our LMRP also provides the opportunity to strategically target replacements in areas where smart meters can contribute to improved network planning and operation, and provide a cost-effective alternative to like-for-like replacement of network assets. Our Off Peak Plus trial identified significant cost savings could be gained from utilising smart metering functionalities to manage controlled loads (e.g. hot water systems). To allow more customers to share in these benefits, we have scheduled replacements to ensure the quality of our controlled load service can be maintained and is efficiently delivered through smart metering capabilities.

Subject to Retailer request, we are also able to provide more granular quarterly plans which can guide the order of meter replacements to aligned with their scheduled quarterly read and allow meter reading routes to be retired. Whilst Retailers have discretion to complete replacements in any order during the Interim Period, voluntarily working in accordance with these coordinated plans can enable the efficiency gains delivered by the rollout to be optimised and achieved sooner.

The spread of meter replacements across our network regions for each Interim Period is shown in Figure 8 below. The volumes of replacements scheduled in each network areas is provided in Appendix A.

Figure 8: LMRP replacements by network region



LMRP Principle 3

DNSPs should have regard to the impact of LMRPs on retailers and other affected stakeholders.

This principle underscores the importance of consultation to enable affected parties to provide their perspectives on the accelerated smart meter deployment. Consultation has allowed us to balance the interests of stakeholders against the LMRP objective and allow the rollout to be delivered in a cost-effective manner.

We started consulting with a key group of Retailers and MCs on the design of our LMRP shortly after the AEMC concluded their metering framework review in August 2023. As the parties responsible for delivering the rollout in accordance with the plan, we consider the views and feedback of Retailers and MCs should have the strongest weight in guiding the direction of the LMRP.

Engagement activities have been positive and constructive, and revealed Retailers and MCs generally share similar LMRP preferences and priorities. These include a desire for:

- A rollout with higher targets during the middle of the LMRP Period to provide time for bedding in new processes whilst also providing capacity in the final year to achieve LMRP compliance targets.
- Grouping meter replacements by their reading routes to provide for an efficient replacement process given metering will be closely located.
- A consistent mix of replacements in urban and regional areas across our entire network area for each year of the LMRP Period to support workforce planning and stable employment.

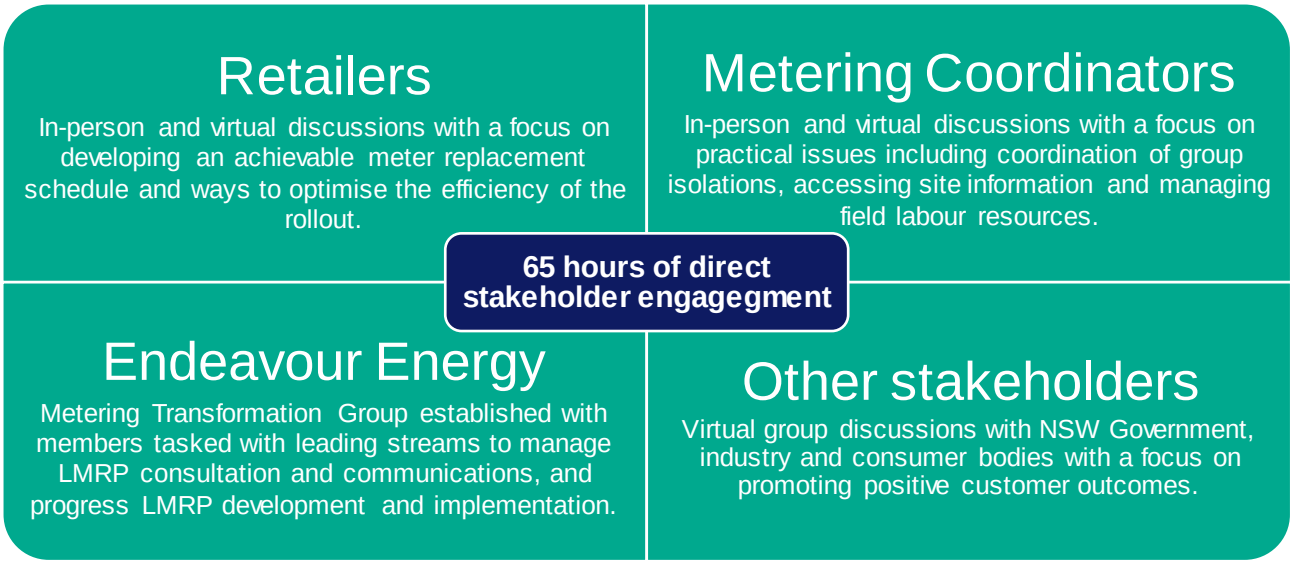
Whilst our LMRP has been predominantly shaped by Retailers and MCs, we have been mindful of providing other stakeholder groups the opportunity for input. We have briefed several key industry groups, including the NSW Government on our plan and have also discussed the key design elements of our replacement schedule with our PCSC to ensure customer insights and perspectives have been considered.

From a customer impact perspective, our LMRP promotes a fair and equitable rollout. It does not prioritise replacements for specific communities, individuals or customer cohorts, thereby ensuring customers are given an equal opportunity to access a smart meter. We are also committed to working collaboratively with Retailers and MCs to plan group isolations to facilitate efficient replacements whilst minimising customer disruption and inconvenience.

To help build public confidence in the rollout, we have also developed a customer factsheet which provides an overview of the metering reforms including the benefits smart metering, our role in the deployment and what it means for customers. The factsheet was developed with input from Retailers, EWON and the JEC to ensure the messaging is accurate and consistent with their own communications to improve customer awareness. We are also in the early stages of developing a Customer Communications and Engagement Plan that will guide the way we will engage with stakeholders through the smart meter rollout and will be designed to complement other industry initiatives such as the Energy Charter's Smart Meter Customer Code.

Section 3 explains in detail how we have regard for this principle in our developing our LMRP.

Figure 9: LMRP consultation with stakeholders



LMRP Principle 4

DNSPs should have regard to appropriate and efficient workforce planning, including in regional areas.

This principle recognises a successful smart meter rollout hinges on the ability of Retailers and MCs to appropriately manage their labour resources. Our plan is conscious of the importance of developing a replacement schedule which matches the availability of contingent meter labour across each of the diverse metropolitan and regional locations in our network area.

Where possible, meter replacements should be planned to optimise the use of local workforces. We know this can be challenging in regional and remote areas which may have a small pool of locally trained and qualified meter installers. Completing meter replacements in these areas may at times require additional meter installers to travel or relocate from their usual workplace. It is also important to avoid volatile and inconsistent work volumes which can create boom and bust cycles which exacerbate resource planning challenges.

To support efficient workforce planning, we have sought to apply a relatively consistent spread of replacements across metropolitan and regional areas. Maintaining this mix of replacements across each Interim Period

promotes a steady flow of work that is capable of sustaining local employment for meter installers throughout the LMRP Period.

This approach is supported by Retailers and MCs as it improves their ability to manage labour market conditions and supply of metering components to deliver the rollout, with some having identified remote areas as candidates for potential proactive replacement prior to the LMRP period. MCs also supported our optimised replacement plans which can guide their LMRP workforce needs.

Our LMRP also considers our internal resourcing capabilities with respect to group isolations. Specifically, we consider spreading meter replacements in metropolitan areas (which host multioccupancy dwellings and therefore are most likely to require group isolations) across the LMRP Period can minimise volatility in the demand for this service. This approach minimises the risk of delaying isolations beyond the maximum timeframes and the potential of incurring additional costs to address resourcing constraints.

Table 4: LMRP replacements split by metropolitan and regional area[1]

Region Type	Year 1	Year 2	Year 3	Year 4	Year 5	Average
Metropolitan Areas	52.3%	51.6%	43.7%	47.9%	42.2%	47.5%
Regional Areas	47.7%	48.4%	56.3%	52.1%	57.8%	52.5%

[1] Network regions denoted "Mixed" in Table 5 comprise significant metropolitan and regional areas. In these regions, a 50:50 split has been applied so that legacy meters are divided equally into metropolitan and regional categories.

Glossary

Abbreviation	Definition
AEMO	Australian Energy Market Operator
AEMC	Australian Energy Market Commission
AER	Australian Energy Regulator
ANS	Ancillary Network Service
BAU	Business-as-usual
CER	Consumer Energy Resources
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DNSP	Distribution Network Service Provider
DSO	Distribution System Operator
EV	Electric vehicles
EWON	Energy & Water Ombudsman NSW
JEC	Justice and Equity Centre
LMRP	Legacy Meter Retirement Plan
MAMS	Metering Asset Management Strategy
MC	Metering Coordinator
MFIN	Meter Fault and Issue Notification
MP	Metering Provider
MSATS	Market Settlement and Transfer Solution
NECA	National Electrical and Communications Association
NEM	National Electricity Market
NER	National Electricity Rules
NERR	National Energy Retail Rules
NMI	National Meter Identifier
OIAI	One-In-All-In
PCSC	Peak Customer and Stakeholder Committee
RRG	Retailer Reference Group
SME	Subject Matter Expert

Appendix A: Legacy meter replacement schedule

Table 5 and Table 6 below provide an overview of the meter replacements scheduled across each of our network areas during the LMRP Period.

Table 5: Schedule of legacy meter replacements by region

Network Area	Classification	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Parramatta	Metropolitan	12,513	32,107	23,685	24,564	14,162	**107,031**
Seven Hills	Mixed	14,733	26,801	28,240	17,700	16,487	**103,961**
Coniston	Regional	13,416	13,268	22,528	18,587	31,847	**99,646**
Minto	Mixed	28,618	14,285	16,637	9,720	10,453	**79,713**
Penrith	Mixed	7,516	11,351	8,987	27,051	3,468	**58,373**
Nowra	Regional	4,590	16,831	15,720	8,862	6,158	**52,161**
Hoxton Park	Metropolitan	11,508	10,448	11,328	6,470	11,942	**51,696**
Fairfield	Metropolitan	5,499	16,063	10,908	7,322	5,783	**45,575**
Windsor	Regional	2,568	6,097	8,940	6,107	4,749	**28,461**
Katoomba	Regional	2,483	12,081	5,843	1,663	2,573	**24,643**
Bowral	Regional	1,432	3,450	9,422	6,091	1,723	**22,118**
Lithgow	Regional	626	1,556	4,552	2,902	2,246	**11,882**
Huntingwood	Metropolitan	422			30	12	**464**
Total		**105,924**	**164,338**	**166,790**	**137,069**	**111,603**	**685,724**

Table 6: Timing of replacements by meter reading route groupings

Network Area	Meter Read Routes
Year 1	
Parramatta	R4255W R4204W R4298W R4079W R4093W R4103W R1123W R4207W R4090W R1025W R4282W R1104W R1096W R4098W R4250W R4099W R1198W R4363W R1063W R4267W R4030W R4121W R4213W R4276W R1120W R4169W R1201F R8160W R1204F R4084W R1105W R4210W R1094W R1084W R1087W R1102W R4201W R1081W R1098W R1097W
Seven Hills	S3393F S3014T S3024W S8354T S3423W S3015F S3042W S3387W S3045T S3424W S3000T S3001T S3456W S3057W S3040W S3046T S8351T S3395F S8377T S8267W S3025W S3146T S3390T S3012T S3003W S3009T S3444W S3247W S3021W S8307T S3008T S8314T S3030W S8327T S8156W S3027T S3016F S3018W S3294W S8393T S8306T S3175W S8120W S3391T S8132W S3430W S3428W S8108W S3411W S8270T S3426W S3408W S8135W S3470W S8361W S3051W S8360W S3058W S3054W S3078W S8371W S8359W S8370W S8358W S3050W S3145T
Coniston	C1592W C1168W C1266T C1302F C1562W C1546W C1468T C1402W C1555W C1420W C1666W C1603W C1601W C1558W C1538W C1568W C1673W C1298W C1667W C1264W C1669W C1518W C1549W C1292W C1607W C1417W C1600W C1543W C1663W C1454W C1294W C1462W C1300F C1261W C1469T C1552W C1672W C1690W C1769T C1564W
Minto	M6123W M5428W M4096W M5140W M4167T M5438W M4061T M4172T M5306W M4024T M5191T M4046T M6068T M6021T M6000T M6105W M4073T M4054T M5315W M5309W M5414W M4171T M6003T M4093T M6009T M6007T M4187T M5203T M4198T M5193T M5303W M6078F M5165W M6002T M4097T M4175W M6079T M5372W M5040W M4033T M4042W M5378W M5030W M5039W M6018T M4006W M4063T M4048T M4032T M5339W M4078T M4186T M6099W M4075W M5099W

	M4110T M6026T M6020T M4210T M4108T M4060T M5194T M5090W M6042T M4162T M4201T M4051T M4000T M6084W M6048T M6035W M6111T M6081W M6063W M4030T M6054W M5360W M6071W M4045T M4041W M5408W M6106W M6045T M4026T M5187W M6092W M5228W M6069W M4022T M4192T M4031T M6057W M5197F M6033W M5185W M6125W M4189T M6080W M6040W M6082W M6027W M6036W M6060W M6038W M4203T M6065T M6066W M6070W M5333W M6030W M6104W M6024W M6023W M6085W M6039W M6083W M6076W M5192F M6073W M5190W M6022W M6103W M6100W M6047W
Penrith	P3587W P3642W P3609W P6249W P3630W P3591W P3606W P6000T P6019T P3594W P6015T P3600W P3639W P3615W P3585W P6024T P6006T P3645W P3564W P6018T P3612W P6004T P3623W P3627W P3613W P3624W P6028T P6009T P6258W P6444W P6285W P6231W P6267W P6234W P6237W P6240W P6243W P6435W P3603W P6008T
Nowra	N4114W N4099W N4153T N4135W N2285T N4033W N4045T N2039W N4165T N4051T N2219W N4042T N4150W N4156W N4048T
Hoxton Park	X5039T X5326W X5417W X5420W X5390W X5411W X5045T X5022T X5062T X5088T X5008T X5031T X5071T X5389W X5048T X5021T X5306W X5387W X5052T X5108W X5408F X5063T X5305W X5429F X5000T X5030T X5324W X5051T X5368W X5435W X5120W X5061T X5068W X5321W X5066T X5432W X5336W X5339W X5349W X5072W X5365W X5067W X5101W X5391W X5388W X5065W
Fairfield	F2099W F2394T F2069W F2102W F2540W F2087W F2114W F2174W F2396T F2111W F2395T F2466W F2060W F2525W F2171W F2381T F2162W F2444W F2177W F2183W F2510W F2537W F2066W F2369T F2505W F2218W F2173W F2204W
Windsor	W7221T W7148T W0004T W0001T W0007T W7255T W7088T W0020T W7223T W7285T W0012T W0002T W0006T W7004T W0014T W7282T
Katoomba	K1123W K1078W K1093W K1036W K1018W K1057W K1026W K1050W K1147W K1051W K1083W K1048W K1117W K1115W K1021W K1065W
Bowral	B5345W B5198W B5360T B5321T
Lithgow	L2144T L2177T L2092T L2034W L2024T L2093T L2003T L2061T L2120T L2013W
Huntingwood	H1000P H2001T H0027T
Year 2	
Parramatta	R8208W R4251W R4249W R8159W R8081W R4138W R1181W R8060W R1171W R4243W R8198W R4252W R1157W R4209W R1135W R8186W R1048W R1070W R4006W R4034W R1057W R1036W R4360W R4217W R8308T R8168W R8175W R1027W R1192W R8063W R1013W R1159W R1186W R1079W R8180W R1153W R4241W R8018W R8011W R8246W R1078W R8212W R8182W R1160W R1147W R1003W R8008W R8206W R1138W R4216W R4343W R1189W R1066W R8173W R1183W R1162W R1126W R8219W R4303W R1093W R8189W R1075W R1042W R8190W R1130W R8288T R4244W R1039W R1108W R4285W R4234W R4222W R4321W R1072W R8015W R8222W R1132W R8309T R8031W R1140W R8013W R4273W R4346W R4245W R8009W R8003W R4288W R4292W R1009W R4186W R1060W R4291W R4228W R8195W R8282T R4162W R8172W R1136F R1090W R8090W R8006W R8042W R8216W R4331W R4270W R8021W R4286W R1100W R1118W R1117W R4322W R8171W R1114W R8231W R4202W R4231W R1006W R8223W R8087W R4351W R8066W R8232W R4240W R4237W R8234W
Seven Hills	S3240W S3459W S8024W S8129W S3178W S8268W S3157W S3186W S8048W S3451W S8338T S8301T S8420W S3225W S8330T S3450W S3378W S3231W S8136W S8337T S8423W S8326T S8323W S8333T S8312T S8126W S3075W S3093W S8343T S8325T S3210W S3369W S3081W S8324T S8133T S3201W S3189W S8302T S3069W S3172W S8045W S8321T S3183W S3168W S3159W S8331T S3219W S3097W S3192W S3249W S3357W S8329T S8150W S3453W S3435W S8328T S8141W S8342T S3207W S8340T S8123W S8341T S3194W S8138W S8421W S3415W S3375W S3373W S8114W S3171W S3417W S8111W S3108W S3198W S3246W S3213W S3243W S8099W S8102W S3165W S3399W S3507W S3180W S3102W S3063W S3196W S8034W S3199W S8049W S3405W S3475W S3486W S3060W S8105W S8057W S3099W S3200W S3285W S3147W S3498W S3174W S3511W S3216W S3130W S8264W S3064W S3429W S3150W S3476W S3087W S3471W S8266W S8101W S3468W S8425W S3128W S3126W S3462W S3120W S3077W S3061W
Coniston	C1435W C1481W C1219W C1456W C1525W C1193W C1066W C1214W C1096W C1394W C1306W C1465W C1035W C1318W C1307W C1459W C1192W C1480W C1684T C1023W C1393W C1436W C1696W C1447W C1658T C1702W C1585W C1483W C1693W C1735W C1729W C1732T C1528W C1081W C1699W C1279W C1432W C1571W C1084W C1531W C1396W C1042W C1723W C1414W C1474W C1046W C1438W C1225W C1738W C1268T
Minto	M5060W M5150W M5028W M5375W M5078W M4163T M4150W M5288W M5387W M4136W M4137W M5087W M5441W M5420W M4090T M4066T M5048W M5057W M5261W M4091W M5051W M4124T M4105W M5054W M5357W M5356W M5015W M4099T M6102W M6129W M5147W M4104T M6112T M5393W M5276W M5102W M5123W M5075W M5402W M5114W M5291W M5444W M5421W M5135W M4116T M5390W M4111T M4092T M5399W M5069W M4018W M6117W M5343W M4009W M5348W M5222W M4102W M4021T M5325W M5202W

Penrith	P6021T P3522W P6105W P6030T P3519W P6096W P6025T P3537W P6045T P6135W P6153W P6102W P6108W P6099W P6094W P3633W P3531W P3618W P6162W P6144W P6150W P6129W P6174W P6093W P6273W P6156W P6126W P6309W P6168W P6072W P6114W P6306W P6159W P6066W P6165W P6195W P6163W P6171W P6189W P6190W P6447W P6321W P6201W P6300W P6141W P6117W P6050W P6420W P6051W P6453W
Nowra	N4072W N4081W N2324W N2300W N2066W N2090W N2259W N4126W N2317W N4063W N2384W N2027T N2213T N2330W N2216T N2033W N2228W N2222W N2270W N2399T N2339W N4069W N2081W N2150W N2060W N2246W N2192T N4075W N2312W N2225W N2258W N2398T N2297W N2069W N2303W N2402T N2205W N2261W N2255W N2327W N2072W N2102T N2084W N2008T N2057W N2393W N2006T N2231W N2237W N2283T N4111W N2306W N2267W N2309W N2014T
Hoxton Park	X5315W X5288W X5333W X5144W X5183W X5117W X5399W X5186W X5297W X5402W X5043T X5083W X5381W X5327W X5294W X5300W X5009T X5233W X5384W X5198W X5318W X5075W X5312W X5342W X5273W X5093W X5231W X5069W X5285W X5376W X5367W X5279W X5369W X5104W X5076W X5366W X5303W X5364W
Fairfield	F2156W F2105W F2042W F2285W F2345W F2348W F2312W F2279W F2136W F2333W F2012W F2240W F2246W F2076W F2399W F2324W F2256W F2363W F2000W F2387W F2318W F2015W F2372W F2340W F2046W F2351W F2141W F2357W F2009W F2138W F2310W F2375W F2145W F2311W F2376W F2237W F2534W F2072W F2315W F2300W F2390W F2330W F2282W F2027W F2336W F2378W F2261W F2007W F2408W F2147W F2175W F2036W F2210W F2263W F2051W F2276W F2258W F2231W
Windsor	W7063WW7081WW7211T W7054WW7020T W7354T W7351T W7048WW7189T W7252T W7348T W7210T W7012T W7360WW7261T W7001T W7008T W7011T W7075WW7030T W7349T W7028T W7240T W7243T W7069WW7060WW7129WW7007T W7350T W7336WW7003T W7078W
Katoomba	K1192W K1030W K1105W K1092W K1068W K1067W K1085W K1072W K1076W K1110W K1099W K1060W K1107W K1102W K1101W K1187W K1175W K1081W K1042W K1045W K1006T K1038T K1077W K1221W K1174W K1111W K1058W K1168W K1132W K1135W K1161W K1240W K1228W K1114W K1222W K1012W K1159W K1237W K1220W K1133W K1096W K1156W K1241W K1204W K1205W K1183W K1137W K1243W K1162W K1180W K1258W K1144W K1225W K1207W K1201W K1238W K1182W K1188W K1252W K1249W K1179W K1141W K1158W K1017W K1235W K1219W K1009W K1190W K1163W K1189W K1053W
Bowral	B5012W B5351T B5243W B5339W B5135T B5139T B5070T B5315T B5348T B5324W B5087T B5081T B5183W B5268W B5226T B5138T B5166T B5105T
Lithgow	L2048W L2099W L2111W L2081W L2057W L2096W L2108W
Year 3	
Parramatta	R1015W R4362W R4069W R1184W R4066W R4100W R4327W R4039W R4196F R4058W R4177W R4052W R4070W R4045W R4009W R4309W R1011W R4153W R4157W R4339W R4054W R4042W R4012W R1059W R4036W R1018W R4173W R4048W R4089W R1045W R4318W R1031W R8213 R4063W R4060W R4027W R8224W R4086W R8086W R8221W R1195W R4081W R8249W R4357W R8315W R8025W R8283T R8187W R4342W R4111W R1156W R4014W R1056W R4021W R1178W R4033W R4168W R4358W R4289W R4193W R8241W R8258W R4332W R4198W R4315W R4301W R4189W R4180W R8240W R4258W R4312W R1121W R4311W R8237W R1074W R4264W R8220W R4306W R8226T R8243W R8225W
Seven Hills	S3306W S3487W S3360W S8072W S3237W S3235W S3489W S8350T S3318W S8414W S3441W S8285T S3348W S8054W S8050T S3492W S8075W S3448W S8117W S3447W S3495W S3303W S3333W S3156W S8387W S3291W S3105W S3280W S3330W S3321W S8052T S3036T S8153W S3438W S3076W S3345W S8069W S8047W S3315W S3478W S3372W S3343W S3261W S3483W S8286T S3255W S3270W S3267W S3288W S3273W S3325W S3300W S3084W S3252W S3162W S8408W S3377W S3276W S3432W S3204W S3379W S3327W S3132W S8426W S3222W S8147W S3381W S8383W S3113W S3513W S8422W S8379W S3114W S3112W S8095W S8367W S8390W S8399W S3501W S3474W S8424W S8366W S3115W S8100W S3111W S3282W S3376W
Coniston	C1229W C1753W C1236W C1489W C1477W C1153W C1141W C1495W C1234W C1189W C1243W C1573W C1501W C1162W C1180W C1526W C1183W C1375W C1080W C1147W C1588W C1210W C1567W C1450W C1582W C1678W C1226W C1164W C1315W C1060W C1423W C1102W C1748W C1237W C1165W C1750W C1012W C1312W C1207W C1475W C1741W C1574W C1744W C1717W C1108W C1111W C1105W C1595W C1262W C1453W C1586W C1144W C1069W C1087W C1156W C1405W C1754W C1576W C1277W C1498W C1376W C1186W C1675T C1747W C1213W C1726W C1045W C1086W C1502W
Minto	M5177W M5066W M5234W M5285W M5411W M5021W M5007W M6093W M5366F M5249W M5216W M4168T M5153W M5243W M4204T M5396W M5198T M5435W M4003T M5138W M5195T M4183W M5324T M5220T M4151T M5168W M5159W M6107W M5363W M4087T M5156W M5244W M4123T M6087W M5206T M5354W M5270W M5259W M5208T M5012W M5200T M6095W M5237W M5258W M4159T M5127W M6075W M5370W M4178W M5174W M6091W M5321W M5171W M6088W M6086W M4179W M6089W M6077W M6043W
Penrith	P3543W P3546W P6048T P3570W P3555W P3549W P3567W P3557W P3552W P6044T P3573W P6123W P6052T P6058W P6055W P6075W P6213W P6207W P6069W P6210W P6177W P6090W P6120W P6265W P6204W P6303W P3621W P6261W P6118W P6455W P6454W P6468W

Nowra	N2348W N2015W N2117T N4009W N4060W N2206W N2189T N2387W N2342W N2282T N2318W N4003W N2249W N2333W N2369T N2351W N2108W N2390W N2096W N2345W N4117W N2356T N2024T N2003T N2099W N2349W N2141W N2286T N2087W N2075T N2177W N4112W N2355T N2315W N2186W N2180W N2111T N4087W N4096W N2030W N2204W N2195T N2012T N2276T N2000T N2105T N2207W N2210T N2183W N2234W N2277T N2193T
Hoxton Park	X5213W X5147W X5042T X5354W X5180W X5225W X5291W X5309W X5243W X5222W X5006T X5357W X5330W X5353W X5132W X5282W X5223W X5162W X5089W X5103W X5156W X5189W X5159W X5237W X5097W X5234W X5078W X5278W X5351W X5345W X5079W X5219W X5102W X5276W X5077W X5375W
Fairfield	F2108W F2055W F2135W F2129W F2426W F2462W F2033W F2393W F2054W F2078W F2432W F2417W F2459W F2048W F2003W F2435W F2117F F2427W F2121W F2120W F2096W F2264W F2411W F2456W F2306W F2418W F2480W F2267W F2045W F2270W F2438W F2249W F2450W F2420W F2409W F2405W F2468W
Windsor	W7106WW7120T W7331T W7273T W7090T W7114T W7042WW7153T W7372WW7105WW7291T W7159T W7283T W7115T W7132T W7036WW7231T W7357WW7276T W7051T W7144T W7009T W7384T W7369WW7246T W7099WW7057WW7087T W7156T W7267T W7258T W7029T W7113T W7134WW7112T W7117T W7151T W7119T W7150T W7327WW7072WW7319WW7321WW7322W
Katoomba	K1276W K1251W K1090W K1127W K1043W K1024W K1129T K1126W K1246W K1362W K1014T K1270W K1312W K1278W K1289W K1040T K1294W K1306W K1265W K1285W K1267W K1282W K1309W K1300W K1279W K1148W K1272W K1283W
Bowral	B5165W B5129T B5216T B5240T B5075T B5316T B5291T B5157T B5039T B5021W B5174W B5003W B5241T B5309T B5009T B5267W B5300W B5210T B5209T B5239T B5078T B5076W B5153T B5120T B5006W B5099T B5234T B5050W B5201W B5336T B5114T B5015W B5124T B5042T B5159T B5057T B5297T B5117T B5093T B5017W B5279W B5180W B5115T B5236T B5002T B5111W B5235W B5256T B5156T
Lithgow	L2040W L2119W L2123W L2130W L2162W L2033W L2054T L2027T L2036T L2090T L2006W L2060T L2116W L2066T L2042T L2147W L2145W L2021T L2000T L2078T
Year 4	
Parramatta	R4114W R4171W R1055W R4057W R4183W R4085W R1021W R4119W R8183W R1000W R1180W R4102W R8165W R4088W R1062W R4051W R4004W R1165W R4018W R4159W R4074W R4194W R4024W R1037W R4025W R1168W R4083W R4000W R4166W R4105W R4023W R1024W R1150W R4294W R1141W R4015W R4140W R8039W R4120W R4137W R4072W R1022W R4118W R4195W R1129W R4165W R4354W R4170W R4132W R8000W R8204W R1028W R4333W R4129W R4355W R4319W R4334W R4345W R8084W R1095W
Seven Hills	S3460W S3153W S8318T S3279W S8092T S8272T S3504W S8051W S3351W S8335T S3309W S3363W S3414W S8417T S8372F S8091W S3142F S8055T S8369W S8093W S3416W S3480W S3258F S3354W S8097W S3366W S3066W S3384W S3125W S8384W S8096W S8400W S8362W S3502W S3443W S8382W S8162W S8378W S8398W S3116W S8427W S8389W S8364W S8392W
Coniston	C1309W C1171W C1159W C1255W C1492W C1522W C1246W C1088T C1513W C1378W C1486W C1252W C1120W C1370W C1342W C1177W C1301F C1507W C1034W C1249W C1471T C1090W C1132W C1682T C1247W C1228W C1093W C1715W C1597W C1584W C1765T C1633W C1372W C1126W C1606W C1768T C1594W C1681T C1099W C1123W C1324W C1331W C1659T C1339W C1619W C1240W C1583W C1200W C1231W C1381W C1612W C1466W C1587W
Minto	M5367W M4101T M5384W M4156T M5085F M5282W M5405T M5018W M5086F M5117W M5231W M5246W M4001T M6114T M5369F M5240W M5201T M5199T M5362W M5082F M5446W M5445W M5205W M6031W M6056W M6049W M6001W M5196W M6061W M6062W
Penrith	P6081W P6423W P6480W P6270W P3576W P6033T P6318W P6034W P3597W P6294W P6291W P6312W P6192W P6087W P6448F P6277F P3528W P6396W P6297W P6276F P6180W P6334W P6426W P6360W P6351W P6216W P6348W P6279W P6402W P6417W P6331W P6384W P6357W P6282W P6327W P6364W P6342W P6387W P6369W P6381W P6222W P6067W P6198W P6375W P6183W P6345W P6399W P6441W P6363W P6411W P6346W P6439W P6324W P6246W P6186W P6432W P6372W P6421W P6336W P6225W P6339F P6429W P6354W P6253W P6315W P6252W P6390W P6459W P6462W P3525W P6053W P6456W P6450W P6037W P6465W P6472W P6478W P3559W P3554W P6264W P3560W P6477W
Nowra	N2036W N2147W N2144W N2294W N2051W N2360W N2120T N2291W N2167W N2129T N2372W N2354W N2042T N4141W N2229W N2018W N2048W N2168W N2363W N2135T N4018T N4015T N2138T N2396T N2132T N2156W N2181W N2310W
Hoxton Park	X5249W X5165W X5210W X5270W X5301W X5096T X5207W X5141W X5352W X5255W X5238W X5360W X5073W X5082W X5232W X5085W X5081W
Fairfield	F2232W F2084W F2360W F2093W F2024W F2075W F2213F F2429W F2165W F2292W F2492W F2288F F2150W F2243W F2189F F2192F F2493W F2474W F2483W
Windsor	W7378WW7186T W7375WW7300T W7271T W7366WW0016T W7318WW7102WW7045WW7192T W0021T W7180T W7181T W7307T W7021T W7309T W7193T W7363WW7306T W7345T W7346T W7355T W7316T W7324T W7270T W7330W

Katoomba	K1066W K1063W K1003T K1335W K1330W K1336W K1324W
Bowral	B5130T B5000W B5181W B5018W B5294T B5084T B5222W B5264W B5023W B5147T B5225T B5192W B5246T B5260T B5090T B5282W B5167T B5298T B5096T B5204W B5299T B5063T B5171W B5045T B5230W B5292T B5123T
Lithgow	L2171W L2067T L2070W L2170T L2063T L2168T L2030W L2156T L2117T L2012T L2082T L2135T L2052T L2153T
Huntingwood	H2011F H2002T
Year 5	
Parramatta	R1177W R4300W R4135W R8067W R4142W R4123W R4154W R4150W R1144W R4003W R4071W R4075W R4139W R8174W R4225W R1174W R4328W R4348W R4310W R4133W R8201W R8209W R4155W R4136W R4134W R4144W R4107W R4156W R1051W R4184W
Seven Hills	S8386W S3324W S8265W S8375F S3297W S3312W S3336W S3138F S8416W S8394W S8078W S3091W S3141F S3339W S3465F S8380W S3259F S3264F S3135W S3228W S8418W S8402W S3394F S8405W S8381W S8396W S8098W S8415W S8374W S8391W S8373W S8376W S8094W S3473W S8353W S8365W
Coniston	C1714W C1273W C1441W C1135W C1336W C1071W C1407W C1281W C1384W C1363W C1627W C1348W C1285W C1366W C1321W C1114W C1427W C1354W C1330W C1355W C1328W C1346W C1351W C1258W C1202W C1041W C1664W C1031T C1388W C1609F C1504W C1380W C1517W C1340W C1327W C1006W C1288W C1720W C1762W C1369W C1054W C1637W C1250W C1367W C1016T C1276W C1408W C1657T C1204W C1653W C1645W C1660T C1028W C1063W C1639W C1387W C1642W C1018W C1020W C1304W C1652W C1651W C1615W C1510T C1129W C1570W
Minto	M5275W M5109W M6126W M4131W M4158W M6090W M4114T M5045W M4138W M5036W M5342W M4077T M5423W M5080W M5319W M5252W M5294W M5000W M5003W M4135W M5083W M5006W M5265W M5188W M6120W M5189W
Penrith	P3515W P6481F P6063F P6064F P6219W P3517W P6393W
Nowra	N2375W N2174W N2153W N4021W N4090W N2198T N2381W N4000W N4120W N2151W N2203T N2201T N2378W N2127T N4031T
Hoxton Park	X5090W X5135W X5192W X5201W X5240W X5261W X5171W X5126W X5150W X5414F X5138W X5099T X5264W X5084F X5098W X5363W X5274W X5074W X5168W X5154W X5100W X5095W X5216W X5277W
Fairfield	F2081W F2507W F2354W F2320W F2528W F2519W F2328W F2291W F2522W F2513W F2487W F2201W F2196T F2501W F2489W F2217W F2222F F2453W
Windsor	W7065T W7168T W7201T W7037WW7203T W7220F W7213T W7227T W7204T W7198T W7171T W7010T W7147T W7196T W7126WW7225T W7294T W7183T W7320W
Katoomba	K1381W K1339W K1318W K1360W K1346W K1378W K1351W K1366W K1337W K1361W K1297W K1363W
Bowral	B5030T B5273W B5285W B5211T B5054T B5051T
Lithgow	L2039T L2045T L2129T L2180W L2192T L2132T L2071W L2101T L2102T L2075T L2072T L2201W L2195W L2183T L2010T L2138T
Huntingwood	H2020W

Appendix B: Compliance checklist

The purpose of this table is to demonstrate compliance of this LMRP with the relevant requirements specified in clauses 11.117.2 - 11.117.4 of the NER.

Table 7: Compliance checklist

NER clause	Requirement	Document Reference
11.117.2(a)	A Local Network Service Provider must develop and submit to the AER for approval, a LMRP that provides for the replacement of all Legacy Meters at connection points on its distribution network (other than an embedded network) over the LMRP Period in accordance with the LMRP Objective.	This document
11.117.2(b)(1)	The LMRP must include a description of the planned replacement program and the process for its development, including an outline of the replacement profile over the LMRP Period, including: (i) the total number of Legacy Meters to be replaced and corresponding NMIs and the number to be replaced in each Interim Period;	Section 2 - LMRP replacement profile Appendix A - Legacy meter replacement schedule
	(ii) if the LMRP proposes to replace Legacy Meters by reference to groups of Legacy Meters such as any grouping by postcodes or geographical areas, details of the proposed grouping, including which groups are intended to be replaced in each Interim Period.	Section 4 - LMRP Principle 2 Appendix A - Legacy meter replacement schedule
11.117.2(b)(2)	The LMRP must include a description of the planned replacement program and the process for its development, including an explanation of how the LMRP is consistent with the LMRP Objective and how the Local Network Service Provider has had regard to the LMRP Principles.	Section 2 - LMRP replacement profile Section 3 - Developing our LMRP Section 4 - LMRP Objective and Principles
11.117.2(b)(3)	The LMRP must include a description of the planned replacement program and the process for its development, including a description of: (i) how the Local Network Service Provider has engaged with relevant stakeholders (including Affected Retailers, relevant Metering Coordinators, relevant local and state governments, and distribution end users or groups representing them in developing the LMRP);	Section 3 - Affected stakeholders Section 3 - Engagement activities
	(ii) the relevant concerns identified as a result of that engagement;	Section 3 - Incorporating feedback
	(iii) how the Local Network Service Provider has sought to address those concerns.	Section 3 – Incorporating feedback Section 4 – LMRP Objective and Principles
11.117.2(c)	In developing the LMRP, a Local Network Service Provider must have regard to the LMRP Principles, which are that: (1) the number of Legacy Meters planned for replacement in each Interim Period should be between approximately 15–25 per cent of the total number of Legacy Meters required to be replaced under the LMRP;	Section 4 – LMRP Principle 1

	(2) the overall efficiency of the LMRP, including costs and potential cost savings for affected Market Participants;	Section 4 – LMRP Principle 2
	(3) the impact of the LMRP on Affected Retailers and other affected stakeholders;	Section 4 – LMRP Principle 3
	(4) appropriate and efficient workforce planning, including in regional areas.	Section 4 – LMRP Principle 4
11.177.3(a)	By no later than 28 February 2025, and prior to submitting its proposed LMRP to the AER, a Local Network Service Provider must: (1) provide to Affected Retailers and Metering Coordinators a draft of its LMRP;	Section 3 – Draft LMRP consultation
	(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;	Section 3 – Draft LMRP consultation
	(3) invite feedback on the draft LMRP.	Section 3 – Draft LMRP consultation
11.177.4(a)	Following consultation under rule 11.177.3, and no later than 30 June 2025, a Local Network Service Provider must provide its draft LMRP to the AER.	Lodged 27 June 2025

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