Legacy Meter Replacement Plan

Ergon Energy Network

27 June 2025

Part of Energy Queensland

CONTENTS

Legacy Meter Replacement Plan

PURPOSE AND SCOPE

The purpose of this document is to provide an overview of the Legacy Meter Replacement Plan (LMRP) which has been developed by Ergon Energy Network to enable the accelerated deployment of smart meters in the National Electricity Market (NEM) and meet the requirements of the National Electricity Rules (NER). This document provides for the replacement of all legacy meters at connection points on Energex's distribution network (other than an embedded network) over the LMRP Period in accordance with the LMRP Objective. the This Plan incorporates the following components:

- The process undertaken to develop the LMRP, including an overview of the number of legacy meters to be replaced in each Interim Period, an outline of the replacement profile and any key considerations that have been applied with respect to exchange volumes and prioritisation of customer segments and groupings by postcodes;
- How the development of the LMRP is consistent with the LMRP Objective and LMRP Principles.
- A description of how Ergon Energy Network has engaged with relevant stakeholders, including any concerns that have been identified through that engagement, and how Ergon Energy Network has sought to address those concerns.

Excluded from the scope of this document are any strategies or plans currently implemented, or targeted for future implementation, by retailers or relevant metering parties to proactively increase the installation of smart meters either prior to or during the LMRP delivery timeframes.

Legacy meter exchange volumes, and any plans to roll out smart meters for non-NEM areas (Power of Choice Exempt), including Card Operated Meter (COM) communities, are also excluded from this scope.

DEFINITIONS, ABBREVIATIONS AND ACRONYMS

Definitions

Unless defined in this section, capitalised terms used in this LMRP will have the meaning given to those terms in the NER.

Affected Retailer	in relation to a LMRP, a retailer that is the FRMP for one or more connection points where a legacy meter is to be replaced under that LMRP
Ergon Energy Network	Ergon Energy Corporation Limited (ABN 50 087 646 062)
Final Rule	National Electricity Amendment (Accelerating smart meter deployment) Rule 2024 No. 20
Interim Periods	each of the following periods: • 1 December 2025 – 30 November 2026 (Period 1) • 1 December 2026 – 30 November 2027 (Period 2) • 1 December 2027– 30 November 2028 (Period 3) • 1 December 2028 – 30 November 2029 (Period 4) • 1 December 2029 – 30 November 2030 (Period 5)
legacy meter	any type 5 and 6 metering installation in operation, other than type 5 metering installations capable of remote acquisition
LMRP Period	1 December 2025 to 30 November 2030
LMRP Schedules	schedules to be supplied by Ergon Energy Network to each Affected Retailer showing the total numbers of legacy meters and associated NMIs by area to be replaced in each Interim Period for that Affected Retailer. Attachment 1 to this LMRP sets out the total numbers of legacy meters by area to be replaced in each Interim Period across all Affected Retailers and Attachment 2 to this LMRP sets out the total numbers of legacy meters by postcode to be replaced in each Interim Period across all Affected Retailers.

Legacy Meter Replacement Plan

Abbreviations and acronyms

AEMC	Australian Energy Market Commission
CER	Consumer Energy Resources
COM	Card Operated Meter
FRMP	Financially Responsible Market Participant
LMRP	Legacy Meter Replacement Plan
LNSP	Local Network Service Provider
MC	Metering Coordinator
MSATS	Market Settlement and Transfer Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERR	National Energy Retail Rules
NMI	National Metering Identifier
PoC	Power of Choice

Legacy Meter Replacement Plan

INTRODUCTION AND OVERVIEW

Who is Ergon Energy Network?

Ergon Energy Network is a subsidiary of Energy Queensland Limited, a Queensland Government-owned corporation, and is the Local Network Service Provider (LNSP) and Distribution Network Service Provider (DNSP) operating in regional Queensland. Ergon Energy Network is responsible for managing and maintaining the existing fleet of legacy meters within its network area, and holds the appropriate Metering Coordinator registration and Metering Provider and Metering Data Provider accreditations in the NEM.

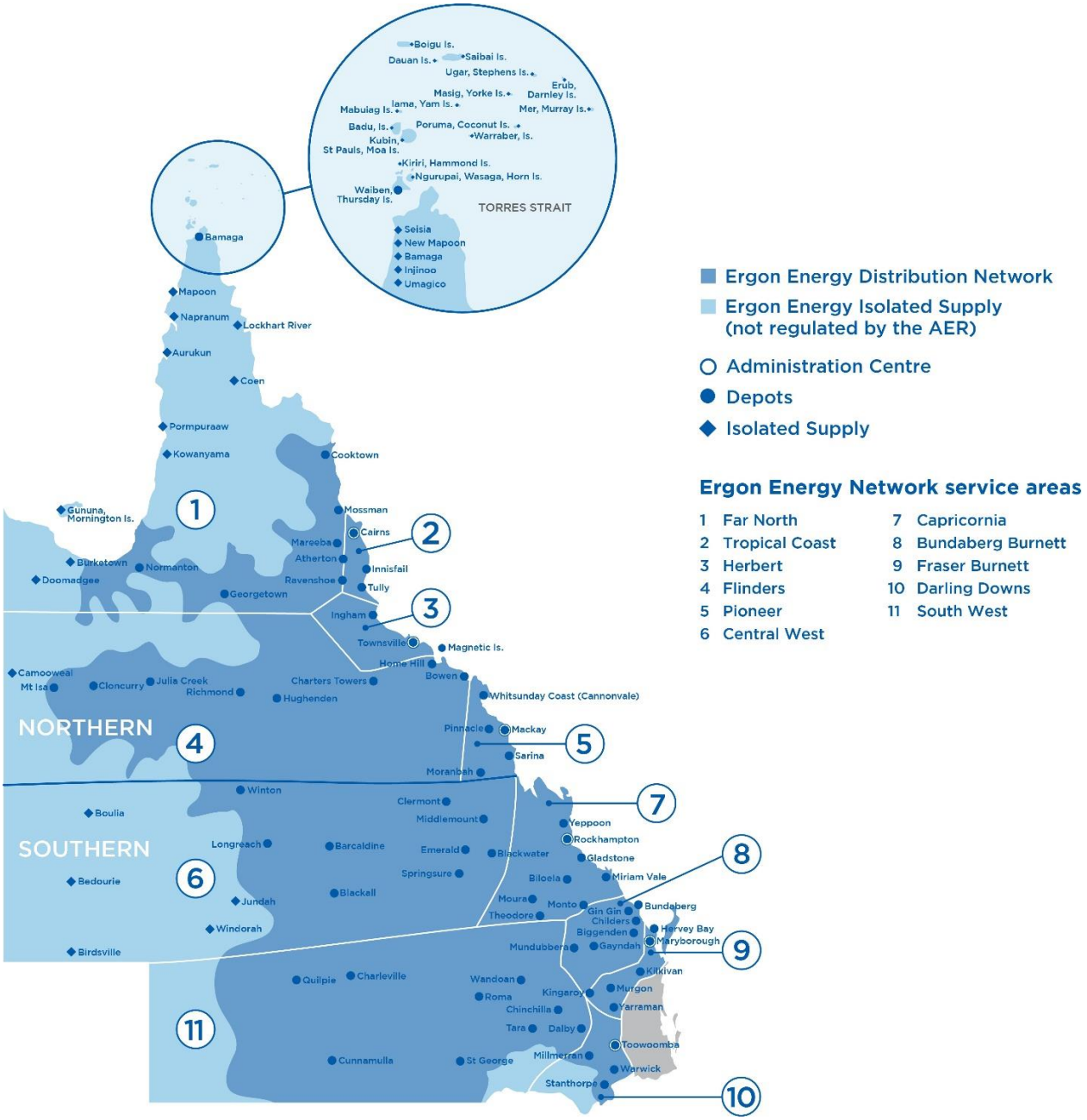
Ergon Energy Network's Area

Ergon Energy Network manages an electricity distribution network which supplies electricity to over 790,000 residential homes and commercial and industrial businesses across a growing population base of around 1.5 million people. Taking supply from Queensland's transmission network service provider Powerlink, we provide electricity across a vast operating area of over one million square kilometres – around 97 per cent of the State of Queensland, with a maximum demand of around 2,600 MW and delivering around 13,800 gigawatt hours (GWh) per year.

Figure 1 shows our distribution area.

Legacy Meter Replacement Plan

Figure 1: Ergon Energy Network's service area



Legacy Meter Replacement Plan

Our electricity network consists of 154,000 kilometres of overhead powerlines, 9,600 kilometres of underground power cables, one million power poles, 262 zone substations, 37 bulk supply substations and 98,000 distribution transformers. Based on line length, around 70 per cent of our electricity network runs through rural Queensland, typically with large distances between communities and one of the lowest population densities per network kilometre in the NEM. Ergon Energy Network has a proportionately high investment in sub-transmission assets, compared to the more urban networks, with voltage levels including 230 volt (V), 11 kilovolt (kV), 22kV, 33kV, 66kV and 132kV. It also has one of the largest Single Wire Earth Return networks in the world.

In addition, Ergon Energy Network owns and operates 33 isolated electricity networks that provide supply to around 7,000 homes and businesses in 34 remote communities in western Queensland, the Gulf of Carpentaria, Cape York, various Torres Strait Islands, and Palm Island. Except for the supply network located in the Mount Isa-Cloncurry region,[1] these isolated networks are not subject to economic regulation by the AER and are not included in this LMRP.

National Metering Reform

Power Of Choice Reforms

Since the Power of Choice (PoC) reforms that came into effect on 1 December 2017, Ergon Energy Network has not installed or exchanged any meters on NEM connected installations, including new installations connected to the network and existing connections requiring a meter exchange.

This has resulted in a steady decline in the volume of type 6 legacy meters operated and maintained by Ergon Energy Network and an increase in the installation of type 4 meters (smart meters). Ergon Energy Network does not operate or maintain any type 5 meters.

Accelerating Smart Meter Deployment

Smart meters are an important component in enabling the transition of the current energy network towards net zero carbon emissions and are a valuable tool to aid the introduction of more Consumer Energy Resources (CER), such as solar photovoltaic (PV) systems, home batteries and electric vehicles. One of the key benefits of smart meters is that they provide customers with an enhanced visibility of their energy usage patterns which can be used to make informed decisions around alternative tariff options or the installation of CER to control and reduce their energy consumption. They also create opportunities for electricity networks to better understand and manage the energy demand on the network.

The implementation of the PoC reforms provided the metering framework and pathway for legacy meters to be replaced over time, with smart meters being installed on a new and replacement basis. While this framework has been in place since 1 December 2017, it has become clear (and

[1] Section 10 of the *Electricity – National Scheme (Queensland) Act* 1997 provides that the AER is responsible for economic regulation of the Mount Isa-Cloncurry supply network.

widely agreed by industry) that a revised approach was required to accelerate the deployment of smart meters to better benefit customers and support the transition to the future energy system.

The Australian Energy Market Commission (AEMC) conducted a *Review of the Regulatory Framework for Metering Services* (the review) and published its final report in August 2023. This report included several recommendations to aid in the acceleration of smart meter deployment. One of the key recommendations was for LNSPs to develop a LMRP. The AEMC subsequently published its final determination and the Final NER and National Energy Retail Rules (NERR) for the *Accelerating smart meter deployment rule change* project in November 2024. The Final Rule implements the recommendations made under the review.

As a result of the above changes, this LMRP has been developed by Ergon Energy Network in accordance with clause 11.177.2 of the NER.

About this Legacy Meter Replacement Plan

This LMRP is consistent with the LMRP Objective and LMRP Principles, as set out in the NER, and incorporates input and feedback received from relevant parties (including Affected Retailers and Metering Coordinators) and industry stakeholders (including government and distribution end users and groups).

Consideration has been given to prioritising target areas where customer benefits and improved safety to workers can be achieved with a smart meter, as well as implementation of the 'One In All In' procedure for metering installations that are part of a Shared Fuse Arrangement.

Ergon Energy Network has nominated the last day of each of the five Interim Periods (30 November 2026 through to 30 November 2030) as the replacement date. This will provide Affected Retailers and Metering Coordinators with flexibility to schedule the legacy meter exchanges within each Interim Period in a manner which is supported by individual resourcing models and other considerations or constraints. To help facilitate an efficient delivery, supplementary information relating to grouping and bundling of meters at customers' installations will be provided in the LMRP Schedules to be provided to Affected Retailers.

LMRP Objective and Principles

The objective and principles for LMRPs are:

LMRP Objective

The replacement of all legacy meters with smart meters in a timely, cost-effective, fair and safe way during the LMRP Period.

LMRP Principles

In developing the LMRP, an LNSP must have regard to the LMRP Principles, which are that:

- 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;

- the overall efficiency of the LMRP, including costs and potential cost savings for affected Market Participants;
- the impact of the LMRP on Affected Retailers and other affected stakeholders; and
- appropriate and efficient workforce planning, including in regional areas.

Background

Prior to the implementation of the PoC reforms in 2017, Ergon Energy Network was able to install and maintain type 6 legacy meters in new or existing metering installations. Since these reforms, the volume of type 6 meters maintained by Ergon Energy Network has decreased due to various reasons including:

- Identification of meter faults which required the legacy meter to be exchanged with a smart meter
- Customer-initiated changes, such as tariff changes or the installation of solar PV, which required the legacy meter to be exchanged with a smart meter, and
- Proactive retailer-led smart meter deployments ahead of the commencement of the LMRP.

All new connections since the 2017 reforms have required a smart meter to be installed by a Metering Coordinator for NEM connected customers.

Ergon Energy Network Meter Volumes

The table below provides an indication of the volume of legacy meters and customer installations (National Meter Identifiers (NMIs)) within the Ergon Energy Network LNSP area in comparison to the volume of smart metered customer installations (NMI only).

Ergon Energy Network	Smart Meter	Legacy Meter
Meter Volumes		**433,025**
NMI Volumes	**495,498**	**278,839**
Percentage	**63.99%**	**36.01%**

Table 1 – Ergon Energy Network Meter and NMI Volumes as of 19 May 2025

Market Participant Roles and Responsibilities

Under the changes to the NER and NERR implemented by the Final Rule, Ergon Energy Network understands the following roles and responsibilities relating to the development and deployment of the LMRP will apply:

Legacy Meter Replacement Plan

LNSP (Ergon Energy Network)

- Develop the LMRP with consideration for the LMRP Objective and Principles, including a detailed schedule of legacy meters and corresponding NMIs to be replaced in each Interim Period.
- Facilitate engagement with relevant industry stakeholders to seek input and invite feedback on the methodology applied in developing the LMRP. Relevant industry stakeholders include Affected Retailers, Metering Coordinators, local and state governments, and consumers or consumer groups.
- Consider feedback and seek to address any concerns raised by relevant industry stakeholders and apply any further changes to the proposed LMRP.
- If the AER approves the LMRP, notify Affected Retailers and Metering Coordinators and provide LMRP Schedules specifying the Legacy Meters and corresponding NMIs to be replaced in each Interim Period under the LMRP.
- Submit the proposed LMRP to the AER for review and approval.
- Record the relevant details of the approved LMRP in the Market Settlement and Transfer Solution (MSATS).

Affected Retailers

- Review proposed LMRPs from LNSPs and provide feedback and/or concerns for consideration
- Outwork the approved LMRPs by ensuring that all legacy meters at connection points for which the Affected Retailer is the FRMP are replaced by the replacement date, unless there is a reasonable explanation for failing to meet the deadline
- Engage and work with Metering Coordinators to facilitate the legacy meter replacements in line with the LMRP Schedules
- Report to the AER on its compliance with the LMRP for each Interim Period.

Metering Coordinators

- Review proposed LMRPs from LNSPs and provide feedback and/or concerns for consideration
- Work with Affected Retailers to facilitate the legacy meter replacements in line with the LMRP Schedules
- Take reasonable steps to exchange legacy meters at customers' installations with consideration for minimal cost impacts to end-use customers.

DEVELOPMENT OF THE LMRP

The following section outlines the key considerations, prioritisation of customer segments and general methodology that Ergon Energy Network has applied in the development of this LMRP to meet the LMRP Objective and LMRP Principles.

Application of the LMRP Principles and LMRP Objective

Volumes of Legacy Meter Exchanges

To ensure the objective of replacing all existing legacy meters with a smart meter in a timely, cost-effective, fair and safe way during the LMRP Period is met, Ergon Energy Network has developed its plans with the below approximate percentage volumes of legacy meters to be replaced in each Interim Period.

The below percentages have been applied to each Affected Retailer's volume of customer installations with remaining legacy meters to ensure resourcing and delivery capacity for Affected Retailers and Metering Coordinators is fair, equitable and consistent across the Interim Periods. These percentages align with the LMRP Principle that 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.

Interim Period	Percentage of NMIs
Period 1 (Dec 2025 – Nov 2026)	**20%**
Period 2 (Dec 2026 – Nov 2027)	**25%**
Period 3 (Dec 2027 – Nov 2028)	**25%**
Period 4 (Dec 2028 – Nov 2029)	**15%**
Period 5 (Dec 2029 – Nov 2030)	**15%**

Table 3 – Interim Period Volume Percentages

Ergon Energy Network identified that the most practical approach was to apply the percentages at a customer installation level (NMI) and not based on the volume of meters. This methodology was applied as when one legacy meter is exchanged at a customer's installation, all meters associated with the same NMI must also be exchanged at the same time. Ergon Energy Network's remaining legacy meter fleet has an average of approximately 1.5 legacy meters per customer installation.

Ergon Energy Network has developed its LMRP with a slightly accelerated program in the first three Interim Periods with consideration for the following factors:

- anticipated challenges that will delay the installation of a smart meter, and

- providing a relatively consistent volume to support Affected Retailer and Metering Coordinator resourcing models.

It is not anticipated that all smart meter installations will be successful on the first attempt due to various factors, including customer switchboard / meter panel defects and access constraints.

The intention of the accelerated forward years is to provide Affected Retailers and Metering Coordinators additional time in the latter Interim Periods to address with customers any challenges encountered in earlier Interim Periods, while also assisting in avoiding an unachievable volume of meter exchanges that increases resourcing requirements to ensure completion towards the end of the LMRP.

Efficiency of the LMRP

It is recognised that effective geographic grouping of works will be critical to enable LMRP efficiencies to be realised, resulting in a timely and cost effective approach for all market participants and ultimately end-use customers. While it is noted that Affected Retailers will be responsible for the detailed planning and scheduling of meter exchanges within each Interim Period, Ergon Energy Network supports this by ensuring that the plan applies geographic grouping within each Interim Period using DNSP information such as depot, suburb/town, street address and meter reading round.

For Affected Retailers and metering parties (Metering Coordinators / Metering Providers), effective geographic grouping for each Interim Period will aid in providing reduced cost to serve for meter exchanges due to reduced travel requirements and increased output from field workers. Additionally, attempting to undertake all meter exchanges in the same geographic area, in the same timeframe, ensures fairness across the geographic grouping. Affected Retailers will have the ability to schedule work to maximise the efficiencies within each Interim Period as well as having the flexibility to combine LMRP bundling with other customer demand metering works.

Ergon Energy Network will also benefit from effective geographic grouping. As we move towards 100 per cent smart meter penetration, there will be a reduction in the requirement for manual meter reading to be completed and effective grouping of work will assist in realising efficiencies throughout the LMRP Period by removing the need to action entire meter reading rounds.

Obtaining the benefits and efficiencies of reduced meter reading rounds is reliant on all customer installations having a meter exchange completed successfully and it is noted that, while it is likely that all sites identified in each Interim Period will be attempted, there will be a small percentage of meter exchanges that will be unable to be completed due to access and customer switchboard / meter panel defects.

The following considerations and methodologies have been applied when developing the LMRP, with respect to bundling efficiencies:

- Meter reading rounds have been identified as the most efficient way to group and bundle legacy meter exchanges, as in most instances the rounds will group all NMIs within a location together in a logical ‘street by street’ order

- All NMIs within a meter reading round for each Affected Retailer have been included in the same Interim Period, where they are not identified as being part of a Shared Fuse Arrangement
- NMIs identified as being associated with Shared Fuse Arrangements have been grouped together based on street number, street name and suburb information. This will support the new 'One In All In' rules for Shared Fuse Arrangements by including all impacted NMIs together in the same Interim Period, regardless of the Affected Retailer.

The application of the above methodology in the development of the LMRP will provide Affected Retailers and Metering Coordinators with the ability to plan and schedule legacy meter replacements in an efficient, cost effective and fair manner, while also providing network savings with a reduction in meter reading costs for legacy meters, both of which will ultimately support a reduction in end-use customer costs.

Impacts on Affected Retailers and Stakeholders, and Appropriate and Efficient Workforce Planning

Ergon Energy Network has considered the impacts on Affected Retailers and other stakeholders, as well as workforce planning and resourcing requirements, in the development of the LMRP. We also identify end-use customers as key stakeholders and have prioritised certain customer segments for inclusion in the forward Interim Periods where there are strong customer benefits in receiving a smart meter, or the potential to reduce the ongoing exposure of workers and customers to safety hazards associated with customer installations.

To ensure that these guiding principles have been addressed, the following methodology and considerations have been applied:

- **Geographic allocation**

  To ensure that Metering Coordinators and Metering Providers have consistent smart meter installation volumes across all geographic areas throughout the LMRP Period, Ergon Energy Network has allocated legacy meter exchanges for individual Affected Retailers within areas across all Interim Periods.

  To enable this, the required volume of legacy meter replacements for each Interim Period has been calculated and assigned at the Ergon Energy Network depot area level. This ensures that legacy meter replacements for all suburbs and localities covered by each depot area are spread across all Interim Periods for each individual Affected Retailer, facilitating a sustainable volume of work for Metering Coordinators and Metering Providers across all Interim Periods, and reducing the need to shift resources from area to area to cover peaks and troughs in the volumes of legacy meter replacements per Interim Period.

  This approach also enables a consistent volume of legacy meter replacements across all areas of coverage.

  Ergon Energy Network notes that while this approach has been taken broadly across the majority of Affected Retailers, it has not been applied in all circumstances where an Affected Retailer has a minimal volume of legacy meters replacements. In these instances, application of the split of legacy meter replacements across the Interim Periods has been

performed at the Ergon Energy Network area level and in some instances of minimal volumes, all legacy meter replacements have been allocated to one Interim Period.

- **Identification and Application of Priority Customer Segments**

  Smart meters are a key tool in providing customers with better visibility of their energy usage patterns and enabling them to make informed decisions with respect to cost saving measures, such as managing and potentially changing their energy consumption and usage patterns, providing access to alternative tariff options that are not available with legacy meters, and potential CER investment options, such as solar PV systems and home battery storage.

  Smart meters also provide the opportunity to reduce the ongoing exposure to industry safety hazards associated with customers' installations, including exposure to dog and customer hazards. Ergon Energy Network appreciates that smart meters will not remove exposure to these hazards completely. However, we consider there is benefit in earlier deployment of smart meters to installations where the presence of these safety hazards is identified and thereby reducing the need for meter reading staff to attend site (with the majority of smart meters being remotely read). Customers with the above-mentioned safety hazards will also benefit as a smart meter will provide actual billing data instead of estimated billing data where Ergon Energy Network meter reading staff and service providers have previously been unable, due to the safety hazard, to gain access to a customer's property to perform a manual billing read.

  The improved energy consumption data available from smart meters will also benefit Ergon Energy Network by enabling us to have a greater visibility of energy demand on the network. This will also aid in making informed decisions with respect to maintenance and management of the network to ensure it can continue to meet end-use customer needs in an evolving energy network that has increasing CER connected. The power quality data that is available with smart meters is also a useful tool in being able to identify safety issues at customer installations (such as open or high resistance neutral connections), thus enabling Ergon Energy Network to identify and investigate these issues proactively and potentially reduce the number of shocks to customers and members of the public.

  To enable the above-mentioned benefits, Ergon Energy Network has applied a series of priority factors when allocating legacy meter replacements in each Interim Period. These priority factors can be split into two distinct groups, primary and secondary priorities. The primary priority groups have been included in the forward Interim Periods where possible, and the secondary priority groups have been considered for early inclusion where there is a low presence of primary priority groups.

  The below information outlines the primary and secondary priority groups and how they are applied in the LMRP:

  - **Primary Priorities**

    Vulnerable Customers – Vulnerable customer segments have been identified utilising the Australian Bureau of Statistics 'Socio-Economic Indexes for Australia (SIEFA), 2021' report. The SIEFA report provides a decile rating of between 1 and 10, with 1 being 10 per cent of suburbs that are the most

disadvantaged and 10 being the 10 per cent of suburbs that are the least disadvantaged.

Ergon Energy Network has identified customers residing in suburbs with a Decile 1 rating as being vulnerable customers and have prioritised the meter reading rounds with a high volume of vulnerable customers for inclusion in the forward Interim Periods of the LMRP Schedule. It is noted that not all Decile 1 suburbs are included in the forward Interim Periods, specifically where the volume of remaining legacy meters for replacement within the identified suburbs and localities is higher than the volume required for that Interim Period.

Ergon Energy Network has not included life support equipment customers or customers with hardship arrangements as part of its identification of a vulnerable customer.

Safety Hazards – Ergon Energy Network has prioritised meter reading rounds with a high volume of known dog or customer hazards for inclusion in the forward Interim Periods of the LMRP Schedule. Ergon Energy Network is committed to reducing the ongoing exposure of workers to these safety hazards by minimising their exposure where possible. It is noted that these hazards are widely spread across all areas and the majority of meter reading rounds.

- **Secondary Priorities**

  Network Grid Visibility – Ergon Energy Network has identified customers with CER, such as solar PV systems and home battery storage, for prioritisation where possible. However, they are not classified as critical when compared to the previously listed priority groups, based on the overall impact and benefit to customers, community and the DNSP.

To maintain delivery efficiency, all customer installations (NMIs) identified in a meter reading round for individual Affected Retailers will remain in the same Interim Period, regardless of the identified priority grouping of the individual customers and where they do not form part of Shared Fuse Arrangements.

- **Shared Fuse Arrangements**

  Ergon Energy Network understands that there is added complexity when attempting to complete a meter exchange on customer installations within Shared Fuse Arrangements. As per the Final Rule, a ‘One-In-All-In’ approach is to be adopted where Metering Coordinators will be required to replace legacy meters for all customers on the same Shared Fuse Arrangement under a single network outage for up to 10 legacy meters, with multiple outages potentially being required for Shared Fuse Arrangements with greater than 10 legacy meter replacements. The intention is to deliver efficiencies and improved customer experiences.

  It is recognised that successful completion of meter exchanges at Shared Fuse Arrangements will take additional time to coordinate between all parties, including the LNSP, Affected Retailers and Metering Coordinators / Providers, and that application of the Final Rules by all relevant metering parties may take additional time to embed into current processes.

Ergon Energy Network has addressed this by applying the following methodology when identifying and scheduling legacy meter replacements at Shared Fuse Arrangements, with the key consideration being the volume of network outages required to facilitate the replacement of all legacy meters:

- Customer installations have been identified and grouped together based on a common address (street number, street name and suburb) where the shared isolation point code equals Y (Shared Fuse Arrangement present) or U (Unknown if Shared Fuse Arrangement present). The Affected Retailer has not been considered as a factor in the grouping of Shared Fuse Arrangements.
- Shared Fuse Arrangements identified as having greater than 40 impacted customer installations with legacy meters, potentially requiring five or more outages to facilitate all legacy meter replacement4s, have been isolated and allocated across all Interim Periods with the same LNSP depot coverage area. The intention of this allocation is to spread the impact on resources for all related metering parties, including LNSP staff required to perform the network isolations, and reduce the potential for large peaks of complex 'One In All In' legacy meter replacements within a single Interim Period.
- The remaining Shared Fuse Arrangements identified as having less than or equal to 40 impacted customer installations with legacy meters have been allocated across the Interim Periods, to meet the below percentage volumes:

Interim Period	Percentage of Calculated Network Outages
Period 1 (Dec 2025 – Nov 2026)	**15%**
Period 2 (Dec 2026 – Nov 2027)	**20%**
Period 3 (Dec 2027 – Nov 2028)	**20%**
Period 4 (Dec 2028 – Nov 2029)	**25%**
Period 5 (Dec 2029 – Nov 2030)	**20%**

Table 4 – Shared Fuse Installation volume percentage

Ergon Energy Network believes that this adjusted approach to the allocation of Shared Fuse Arrangements will support the implementation of the 'One In All In' approach and procedure by grouping all customer installations identified as a Shared Fuse Arrangement at a single physical location together in the same Interim Period, and provide an opportunity for industry to develop and embed the necessary processes to coordinate and successfully complete the required legacy meter replacements and reduce the impact and costs to end-use customers.

As individual Affected Retailer legacy meter replacement volumes are not specifically considered as part of the allocation of Shared Fuse Arrangements to an Interim Period, Ergon Energy Network has ensured that the overall volume of legacy meter replacements required in each Interim Period for each Affected Retailer is consistent with the overarching percentage splits for each Interim Period.

Ergon Energy Network's Safety Commitment

Ergon Energy Network acknowledges that the replacement of legacy meters in a safe manner is critical to the success of this LMRP and the LMRP Objective, and that the safety of workers and customers should not be compromised under any circumstance. We also acknowledge that there are various factors that may contribute to the presence of hazards in addition to the above-mentioned dog and customer hazards including customer installation configurations, presence of asbestos and access restrictions (location, terrain etc).

Ergon Energy Network is committed to supporting Affected Retailers and Metering Coordinators in the safe installation of smart meters by:

- ensuring known hazard information is updated in Ergon Energy Network's Customer Information System and published to MSATS where applicable;
- continuing to support information sharing processes through formal market requests and ad-hoc requests where applicable and adhering to privacy and information sharing requirements under the *Privacy Act 1988* (Cth);
- providing temporary isolation services for Affected Retailers and Metering Coordinators upon request where it is identified that isolation of supply is required to safely exchange a legacy meter
- supporting Energy Queensland Limited's 'Safe Entry Policy' and procedures for safely accessing customer installations; and
- utilising existing regular meeting platforms, forums and communication channels to provide a platform for Affected Retailers and Metering Coordinators to raise any questions, concerns or requests for support with regards to safety

Ergon Energy Network has previously written to Affected Retailers requesting their support to keep electricity industry workers safe by targeting smart meter installations at customer's premises that have known dog and customer hazards present. To support this, Ergon Energy Network provided all Affected Retailers with a detailed list of NMIs which included the relevant hazard information. Ergon Energy Network will continue to provide Affected Retailers with information related to safety throughout the LMRP Period upon reasonable request where the information is known and where permitted by privacy requirements.

Ergon Energy Network Identified Constraints

Ergon Energy Network acknowledges that there will be challenges faced by metering parties which have the potential to impact delivery efficiencies and reaching the target of 100 per cent of legacy meters replaced within the LMRP Period. Based on information obtained from current targeted smart meter deployments, and in line with the AEMC's final determination, Ergon Energy Network anticipates that between 10-15 per cent of legacy meters will remain in situ at the end of the LMRP Period.

The below provides a breakdown of the key challenges and constraints anticipated by Ergon Energy Network, which have the potential to impact efficiency and may prevent a smart meter from being installed.

Defects at Customer's Switchboards

Defects identified at a customer's switchboard / metering panels have the potential to impact the successful installation of a smart meter. Where a major defect is identified by a Metering Coordinator, it is anticipated that a smart meter will not be installed, and a defect notice will be issued.

The customer (property owner) is responsible for the maintenance of their own switchboard. However, the customer is not required to rectify any identified defects that prevent the installation of a smart meter where the customer has not initiated the requirement for smart meter installation (such as solar PV installation, tariff change, or supply upgrade).

Ergon Energy Network anticipates that some customers will be willing to remediate defects to enable a smart meter installation, whereas other customers may not be as willing or may not have the financial means to perform the required remediation. It is likely that these installations will become exempt from the LMRP, and the legacy meter will remain until the defects are remediated.

One In All In – Shared Fuse Arrangements

Ergon Energy Network has considered the best approach to bundle legacy meter replacements within the same Shared Fuse Arrangement in the same Interim Period. One of the challenges we anticipate is that the schedule for Shared Fuse Arrangements is not adhered to because one legacy meter has been identified for an earlier replacement than scheduled due to various factors, including meter failure, customer-initiated replacement, or Affected Retailer-initiated replacement.

Ergon Energy Network has considered the above factors in the development of the LMRP Schedule and has adjusted the scheduled volumes for Shared Fuse Arrangements to have less volumes in the first Interim Period, with a peak of maximum volumes in the fourth Interim Period.

Access to Customer's Installation

Ergon Energy Network anticipates that restricted or difficult access to customers' installations will have an impact on the efficiency of the LMRP Schedule. The impacts of restricted access apply to both the Affected Retailer and Metering Coordinators with respect to the additional effort required to coordinate access with a customer and this has the potential to create inefficiencies for Ergon Energy Network in the ongoing management of meter reading activities for legacy meters.

Resource Availability

Ergon Energy Network appreciates that the accelerated smart meter deployment will see an increase on the current volumes of legacy meter replacements being completed within the industry. With this increase, it is anticipated that Metering Coordinators and Affected Retailers may need to engage additional resources to meet the required target, noting that technically trained personnel may take additional time to train and become accredited to perform the required work. We have also identified that the increase in temporary isolations to support the 'One-In-All-In' approach for Shared Fuse Arrangements will have an impact on Ergon Energy Network's resourcing requirements.

Ergon Energy Network has considered the above factors in the development of the LMRP Schedules and, in conjunction with other factors such as anticipated defects and access constraints, has applied the yearly breakdown on the basis that overall resourcing requirements will be consistent across the five Interim Periods.

Data Quality

Ergon Energy Network has applied several considerations and factors in the development of the LMRP Schedules. While best efforts have been taken to ensure that the information is correct, it is anticipated that data quality may have a small impact on the overall delivery of the LMRP. This includes, but is not limited to, identification of Shared Fuse Arrangements, safety hazards, and onsite legacy meter arrangement (i.e. meter make and model). It is anticipated that any data quality discrepancies will be immaterial in the overall efficiency and delivery of the LMRP.

CONSULTATION AND ENGAGEMENT

Ergon Energy Network has initiated various engagement activities, including engagement sessions, with relevant stakeholders, including Affected Retailers, Metering Coordinators, and other industry stakeholders and consumer groups.

The intention of the engagement sessions was to outline the proposed methodologies and considerations utilised in the development of the LMRP, provide an overview of expected volumes of legacy meter replacements, and invite feedback on the proposed plan.

Affected Retailer Engagement

Ergon Energy Network has engaged with Affected Retailers, providing them with an overview of how the LMRP has been developed and an indication of expected volumes and locations of legacy meter replacements in each Interim Period. The following engagement mechanisms have been utilised:

- November 2023 – Ergon Energy Network contacted all Affected Retailers and provided an overview of the proposed content of the LMRP, including the proposed methodology and considerations used in the development of the plan, customer segments and location groupings prioritised for earlier legacy meter replacements, indicative volumes and percentage breakdown for yearly targets, as well as an opportunity to provide feedback.

  Meetings were held with the majority of Affected Retailers during November 2023. Meetings were arranged with all Affected Retailers with greater than 1,000 NMIs and Affected Retailers with less than 1,000 NMIs were offered via email correspondence the opportunity to meet upon request.

- May 2024 – Ergon Energy Network contacted all Affected Retailers and provided an update on progress with the development of the draft LMRP, including an overview of fundamental changes that were being implemented based on the feedback received. A detailed draft schedule specifying NMIs with legacy meters was provided, noting that the above-mentioned changes had not yet been applied.

  Meetings were held with the major Affected Retailers (i.e. Ergon Energy Queensland, AGL, EnergyAustralia, Origin and Red Energy) during May 2024. All other Affected Retailers were offered the opportunity to request a meeting.

- November 2024 – Ergon Energy Network contacted all Affected Retailers and provided a revised proposed draft LMRP, including any fundamental changes applied based on feedback received. Ergon Energy Network provided a detailed draft schedule specifying NMIs with legacy meters to be replaced and the proposed corresponding Interim Period.

  Meetings were arranged with the major Affected Retailers (i.e. Ergon Energy Queensland, AGL, EnergyAustralia, Origin and Red Energy) during November 2024. All other Affected Retailers were offered the opportunity to request a meeting.

- February 2025 – Ergon Energy Network contacted all Affected Retailers and provided an update copy of the draft LMRP, formally inviting feedback in line with clause 11.117.3 of the

NER. Ergon Energy Network provided an updated detailed draft schedule specifying NMIs with legacy meters to be replaced and the proposed corresponding Interim Period.

Metering Coordinator Engagement

Ergon Energy Network has engaged with all Metering Coordinators registered to operate in Queensland and provided them with an overview of how the LMRP has been developed and an indication of expected volumes and locations of legacy meter replacements in each Interim Period. The following engagement mechanisms have been utilised:

- November 2023 – Ergon Energy Network contacted all Metering Coordinators with an overview of the proposed draft LMRP, including the proposed methodology and considerations used in the development of the plan, customer segments and location groupings prioritised for earlier legacy meter replacements, indicative volumes and percentage breakdown for yearly targets, as well as an opportunity to provide feedback.

  Meetings were held with all Metering Coordinators during November 2023. Specifics of individual volumes of legacy meters that require replacement were not provided to Metering Coordinators as they are not a current market participant for the majority of legacy metered NMIs. An overview of the entire volume of legacy meters for replacement within the Ergon Energy Network LNSP area was provided.

- May 2024 – Ergon Energy Network contacted all Metering Coordinators and provided an update on progress with the development of the draft LMRP, including an overview of fundamental changes that were being implemented based on the feedback received. An overview of the draft schedule of the total volume of legacy meters requiring replacement was provided, noting that the above-mentioned changes had not yet been applied.

  Meetings were held with the four major Metering Coordinators operating in regional Queensland (i.e. Intellihub, Plus ES, Bluecurrent and Yurika).

- November 2024 – Ergon Energy Network contacted all Metering Coordinators and provided a revised proposed draft LMRP, including any fundamental changes applied based on feedback received. An overview of the draft schedule of the total volume of legacy meters requiring replacement was provided.

  Meetings were held with the four major Metering Coordinators operating in regional Queensland (i.e. Intellihub, Plus ES, Bluecurrent and Yurika).

- February 2025 – Ergon Energy Network contacted all Metering Coordinators and provided a revised proposed draft LMRP, formally inviting feedback in line with clause 11.117.3 of the NER. An overview of the draft schedule of the total volume of legacy meters requiring replacement was provided.

Other Engagement Activities

Ergon Energy Network has engaged with other relevant stakeholders, including the Queensland Government (Department of Energy and Climate), Master Electricians Australia representatives, the Customer and Community Council Queensland, and industry partners (Electrical Trades Union), making them aware of the Final Rules and providing an overview of the proposed LMRP development considerations for Ergon Energy Network, and inviting feedback on the proposed plan.

We have also taken steps to support a smooth and efficient smart meter deployment prior to the commencement of the LMRP by:

- providing Affected Retailers with lists of sites with known hazards, including the relevant hazard information (dog or customer hazards);
- providing metering keys to market participants to enable access to customers metering installations; and
- initiating a working party with Affected Retailers and Metering Coordinators to facilitate 'One In All In' trials at Shared Fuse Arrangements

Future Engagement Commitment

Ergon Energy Network is committed to providing ongoing support to Affected Retailers and Metering Coordinators throughout the LMRP Period to ensure a successful deployment of smart meters. To facilitate this, Ergon Energy Network will utilise existing communication channels, such as regular meetings and email communications, as a mechanism for Affected Retailers and Metering Coordinators to table any questions, concerns or requests for support, as required.

Ergon Energy Network will continue to utilise existing communication platforms, such as industry forums and stakeholder meetings, to engage with other relevant stakeholders regarding the LMRP and to understand and address, where practical, any questions or concerns that are identified. Relevant stakeholders include, and are not limited to, Queensland Government and Local Government departments, industry representative bodies, customer and community representative groups and industrial partners.

Feedback Received and Response to Feedback

Over the course of our engagement with Affected Retailers, metering parties and relevant stakeholders, Ergon Energy Network invited feedback on the proposed LMRP. A record of all feedback has been maintained. The table below provides a summary of the feedback received and Ergon Energy Network's responses to that feedback.

Topic	Feedback	Response
Initial proposal for accelerated forward Interim Periods with the following percentages of NMI / Meters per period: Period 1 – 25% Period 2 – 25% Period 3 – 20% Period 4 – 15% Period 5 – 15%	It was noted that some of the Affected Retailers and Metering Coordinators who provided feedback on the proposed interim volumes were opposed to having the first period at the maximum of 25%. Various suggestions were provided ranging from 15-20% in the first Interim Period to allow for resourcing uplift within the industry. General support was provided for a lower volume of legacy meters scheduled for replacement in the final Interim Periods to allow for revisiting of complex or previously exempted legacy meter replacements.	Ergon Energy Network has adjusted its proposed plan to reduce the volume of legacy meters scheduled for replacement in the first Interim Period to 20%. The updated interim volumes in the draft LMRP are: Period 1 – 20% Period 2 – 25% Period 3 – 25% Period 4 – 15% Period 5 – 15%
Geographic grouping of legacy meter replacements within the same Interim Period utilising suburb, locality or town (as applicable for the area).	Feedback received indicated that while geographic grouping was supported, a lower level of grouping would potentially provide a more efficient schedule that would assist in a cost reduction for Metering Coordinators and Affected Retailers. A suggestion to use meter reading round as opposed to suburb, locality or town was provided by some participants.	Ergon Energy Network agreed with the proposal to refine the grouping of legacy meters for replacement by utilising meter reading round information. It is recognised that the meter reading rounds would effectively provide a 'door to door' and 'street by street' scheduling opportunity for Affected Retailers and their associated Metering Coordinators. Ergon Energy Network has adjusted the methodology used to assign legacy meters for replacement so that all legacy meters for an individual Affected Retailer are bundled within the same Interim Period of the LMRP where Shared Fuse Arrangements are not identified as being present.
Geographic grouping of legacy meter replacements within the same Interim Period utilising suburb, locality or town (as applicable for the area).	Feedback received from Metering Coordinators that does not support grouping for an individual Affected Retailer.	Ergon Energy Network acknowledged the feedback and understands that there are potential efficiencies for Metering Coordinators and their respective metering service providers if all legacy meter replacements within the same meter

Topic	Feedback	Response
	Suggestion made that grouping should be purely geographical and meter reading route based. The reasoning for this suggestion is that customer frequently change retailers and there is no guarantee that customers will not have churned retailer by the commencement on 1 December 2025.	read round were to be bundled in the same Interim Period. While this feedback is noted, Ergon Energy Network has applied a distribution of legacy meter replacements across the Interim Periods considerate of each Affected Retailer to ensure that there are no large peaks or troughs of legacy meter replacement volumes in each Interim Period for Affected Retailers. Ergon Energy Network also notes that the volumes and individual sites allocated to each Interim Period are a minimum requirement, and that there are no rules that prohibit Affected Retailers from exchanging a legacy meter in an Interim Period earlier than prescribed in the LMRP Schedule.
Proposal to balance the deployment of Shared Fuse Arrangements in line with the proposed LMRP Interim Period percentages.	Mixed feedback was received with respect to balancing the deployment of Shared Fuse Arrangements in line with the proposed LMRP Interim Period percentages. Some participants suggested that a heavier forward weighted approach should be considered, whereas others had concerns with the broader planning and coordination required to facilitate the 'One In All In' process and impacts a forward weighted schedule would have on field resources. Feedback was also received suggesting that attempts to bundle Shared Fuse Arrangements with other legacy meters replacements (via round) would drive efficiencies.	Ergon Energy Network has considered the feedback received and has adjusted the percentage volumes of Shared Fuse Arrangements for each Interim Period to the below, allowing for industry processes and coordination between relevant metering parties to mature and develop. Period 1 – 15% Period 2 – 20% Period 3 – 20% Period 4 – 25% Period 5 – 20% Scheduling of legacy meters for replacement in Shared Fuse Arrangements will be performed separately to other legacy meters, in the sense that whole installations will be identified and bundled utilising physical location information (street number, street name and suburb). This will ensure that all legacy meters within the same Shared Fuse Arrangement are scheduled for the same Interim Period, regardless of the Affected Retailer, which will provide clear visibility of future 'One In All In' schedules and allow for better resourcing forecasting for impacted metering parties, including

Topic	Feedback	Response
		LNSPs who will be required to facilitate the network outage.
Proposal to identify customer segments for earlier scheduling based on priority factors. These include vulnerable customers, safety hazards, network grid visibility and high consumption customers.	General support was provided for prioritising certain customer segments on the condition that it did not have a negative impact on delivery efficiency, and that all legacy meters within the agreed grouping method (meter reading round) were scheduled for completion in the same Interim Period. Some participants raised concerns with prioritising vulnerable customer segments due to issues with switchboard / meter panel defects being identified, customers not being in a financial position to remediate the defects to enable the legacy meter replacement and imposing higher costs for the longest periods on vulnerable customers with the introduction of capital charges in default metering services costs. A suggestion was made to hold off on vulnerable customer segments until a support model can be implemented by jurisdictional governments. Another suggestion was made to reconsider prioritising vulnerable customers entirely.	Ergon Energy Network appreciated the feedback regarding general support for priority groups and confirms that efficiency will not be impacted by the prioritisation of customer segments calculated at the whole of a meter reading round for individual Affected Retailers. All legacy meters identified in meter reading rounds with a higher volume of priority factors will be grouped together and scheduled in the forward Interim Periods. In response to the concerns raised regarding the potential financial impact as a result if an identified defect and introduction of capital charges in default metering services costs, while Ergon Energy Network appreciates the concerns, we believe that utilising the SIEFA data as the basis for vulnerable customer segments will result in a mixture of customer circumstances ranging from genuine financial hardship customers to customers who reside in suburbs identified as vulnerable but who are not experiencing financial hardship. It is also noted that customers residing outside of the identified vulnerable suburbs may also be experiencing financial hardship. Ergon Energy Network notes that the responsibility to remediate switchboard / meter panel defects remains with the premise owner, and it is likely that genuine financial hardship customers are not the owner-occupier of their residence. Ergon Energy Network respects the concerns raised, but, based on the above and the need to support customers so that they receive the benefits associated with a smart meter, we do not propose removing vulnerable customer segments as a priority group from the LMRP.

Legacy Meter Replacement Plan

LMRP COMPLIANCE STATEMENT

Key considerations	Relevant NER obligation	Where this is addressed in the LMRP (Section/Page)
The LMRP covers all Legacy Meters at connection points other than embedded networks	11.177.2(a)	Pg 8 - Ergon Energy Network Meter Volumes, Table 1
The LMRP includes an outline of the replacement profile over the LMRP period, including: a) the total number of Legacy Meters to be replaced b) the corresponding NMI for each Legacy Meter c) the number to be replaced in each Interim Period	11.177.2(b)(1)(i)	Pg 8 - Ergon Energy Network Meter Volumes, Table 1 Corresponding NMIs for each Legacy Meter is confidential information and therefore will be provided to each Affected Retailer and the AER in confidence. Pg 27 - Attachment 1, Legacy Meter Schedule by Area Pg 29 - Attachment 2, Legacy Meter NMI by Post Code
If the LMRP proposes to replace Legacy Meters in groups (e.g. by postcode or by geographical area), the LMRP outlines: a) the proposed grouping of Legacy Meters b) which groups are to be replaced in each Interim Period	11.177.2(b)(1)(ii)	Pg 11 - Efficiency of the LMRP Pg 27 - Attachment 1, Legacy Meter Schedule by Area Pg 29 - Attachment 2, Legacy Meter NMI by Post Code
The LMRP outlines the areas of high-priority (if any) and an explanation of why these areas have been chosen (e.g. aged meters, efficient to replace all meters in a geographically isolated area)	11.177.2(b)(1)	Pg 12 - Impacts on Affected Retailers and Stakeholders, and Appropriate and Efficient Workforce Planning – Identification and Application of Priority Customer Segments
The LMRP includes an explanation of how it is compliant with the LMRP Objective	11.177.2(b)(2)	Pg 10 – Application of the LMRP Principles and LMRP Objective

The LMRP includes an explanation of how the LNSP has had regard to the LMRP principles	11.177.2(b)(2)	Pg 10 – Application of the LMRP Principles and LMRP Objective
The LMRP includes a description of: a) how the LNSP has engaged with relevant stakeholders, including: i. Affected Retailers ii. relevant Metering Coordinators iii. relevant local and state governments iv. distribution end users and groups representing them b) the relevant concerns identified in this consultation c) how these concerns have been addressed	11.177.2(b)(3)	Pg 10 – Application of the LMRP Principles and LMRP Objective Pg 19 – Affected Retailer Engagement Pg 20 – Metering Coordinator Engagement Pg 21 – Other Engagement Activities Pg 22 – Feedback Received and Response to Feedback
The LMRP includes strategies or plans for ongoing engagement with stakeholders during the LMRP Period	AER Guidance Note	Pg 21 – Future Engagement Commitment
The LMRP includes information and commitments to ensuring the safe installation of smart meters. This may include information about the ongoing consultation, strategies and relevant policies that ensure that smart meters are replaced in a safe way throughout the LMRP Period.	AER Guidance Note	Pg 16 – Ergon Energy Network's Safety Commitment
The LMRP demonstrates that the LNSP has: a) provided a draft LMRP to Affected Retailers b) provided a schedule specifying the Legacy Meters and corresponding NMIs to be replaced in each Interim Period to Affected Retailers and Metering Coordinators c) invited feedback on the draft LMRP by 28 February 2025 and ahead of the submission of the draft LMRP to the AER	11.177.3	Pg 19 – Affected Retailer Engagement Pg 20 – Metering Coordinator Engagement Pg 22 – Feedback Received and Response to Feedback

ATTACHMENT 1 – LMRP SCHEDULE BY AREA

The tables below provide the total numbers of legacy meters and affected NMIs by area to be replaced in each Interim Period. All Affected Retailers will be provided separately with a detailed schedule specifying the legacy meters and corresponding NMIs to be replaced in each Interim Period under the LMRP[2].

Ergon Energy Network – Legacy Meter Schedule by Area

Location - Area	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Total Legacy Meters
BUNDABERG BURNETT	3,665	4,659	4,187	3,707	2,922	**19,140**
CAPRICORNIA	13,629	15,559	16,688	12,455	10,526	**68,857**
CENTRAL WEST	3,497	4,490	4,791	3,910	3,006	**19,694**
DARLING DOWNS	11,145	14,591	15,176	12,540	10,364	**63,816**
FAR NORTH	3,751	4,962	5,723	5,430	4,276	**24,142**
FLINDERS	2,687	3,219	3,564	2,977	2,564	**15,011**
FRASER BURNETT	4,885	6,562	6,286	5,165	4,353	**27,251**
HERBERT	6,690	9,675	10,879	9,003	6,822	**43,069**
PIONEER	10,552	13,593	13,044	10,570	9,337	**5,7,096**
SOUTH WEST	5,841	6,414	6,759	6,252	5,631	**30,897**
TROPICAL COAST	11,156	13,995	15,141	12,695	11,065	**64,052**
Grand Total	**77,498**	**97,719**	**102,238**	**84,704**	**70,866**	**433,025**

[2] In the context of clause 11.177.3(a)(2) of the NER, Ergon Energy Network is the Metering Coordinator for legacy meters. Therefore, the detailed schedule will be provided to Affected Retailers.

Legacy Meter Replacement Plan

Ergon Energy Network – Legacy NMI Schedule by Area

Location - Area	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Total Legacy Meters
BUNDABERG BURNETT	2,448	3,001	2,806	2,341	1,909	**12,505**
CAPRICORNIA	8,671	10,060	10,811	7,819	6,758	**44,119**
CENTRAL WEST	2,264	2,907	3,081	2,527	2,076	**12,855**
DARLING DOWNS	7,012	9,660	9,755	7,631	6,091	**40,149**
FAR NORTH	2,205	3,195	3,392	3,311	2,390	**14,492**
FLINDERS	1,496	1,799	1,949	1,578	1,384	**8,205**
FRASER BURNETT	3,286	4,455	4,304	3,386	2,924	**18,355**
HERBERT	4,052	5,432	6,829	5,419	4,212	**25,944**
PIONEER	7,336	9,352	9,175	7,287	6,777	**39,927**
SOUTH WEST	4,077	4,495	4,792	4,039	3,685	**21,088**
TROPICAL COAST	7,432	9,037	9,591	8,011	7,129	**41,200**
Grand Total	**50,279**	**63,393**	**66,485**	**53,349**	**45,335**	**278,839**

ATTACHMENT 2 – LMRP SCHEDULE BY POST CODE

The tables below provide the total numbers of NMIs by post code with legacy meters by to be replaced in each Interim Period. All Affected Retailers will be provided separately with a detailed schedule specifying the legacy meters and corresponding NMIs to be replaced in each Interim Period under the LMRP. [3]

Ergon Energy Network – Legacy Meter NMI by Post Code

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
2372	31	5	13	27	29	105
2476		19	24		39	82
4310					2	2
4313					1	1
4314	10	119	474	214	133	950
4344				1		1
4350	3,384	6,434	6,589	4,456	3,015	23,878
4352	600	375	434	371	834	2,614
4353	28		1	26	7	62
4354	15	37	56	44	15	167
4355	47	1	1	168	97	314
4356	185	544	128	181	158	1,196
4357	85	132	106	55	59	437
4358	358	151	18	116	25	668
4359	39			70	46	155
4360	18	2		58	16	94
4361	261	16	200	78	215	770
4362	48	3	399	40	84	574
4363	2	76		107	3	188
4364	19	16	47	56	27	165
4365	81	29	23		1	134
4370	715	738	727	1,015	668	3,863
4371	3	86	78	42	1	210
4372		20	24		6	50

[3] In the context of clause 11.177.3(a)(2) of the NER, Ergon Energy Network is the Metering Coordinator for legacy meters. Therefore, the detailed schedule will be provided to Affected Retailers.

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4373	6	97	55	40	47	245
4374	17	3	37	20	9	86
4375	23		23	20	26	92
4376	2	4	72	17	9	104
4377	9	97	52	13		171
4378	30	46	37	7	16	136
4380	281	517	320	354	311	1,783
4381	7	34	35		40	116
4382		8	103	60	27	198
4400	49	45	53	36	5	188
4401	626	15		20	90	751
4402			96	59		155
4403	34	58	3	83	67	245
4404	6	23	17	76	64	186
4405	359	1,041	869	634	602	3,505
4406	153	24	41	110	155	483
4407	2	27	105	57	27	218
4408	30	24	139	76	32	301
4410	414	57	10		70	551
4411	16	3	13	56	54	142
4412	2	17	5	51	6	81
4413	813	736	943	500	295	3,287
4415	21	92	46	141	172	472
4416	61	78	14	5	60	218
4417	309	23		2	6	340
4418		9		26	13	48
4419	63	202	102	98	72	537
4420	119	38	120	85	93	455
4421	123	223	197	142	65	750
4422		29	81	66	69	245
4423	6	14	20	6	32	78
4424	1		16	7	60	84
4425	8		11	16	53	88
4426	8			24	22	54
4427	31	2	95	7	43	178
4428	28	3	94	39	130	294
4454	20	54	102	97	103	376
4455	595	769	807	601	481	3,253

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4461				21	20	41
4462		2	3	32	20	57
4465	18	60	85	52	165	380
4467			11	33	39	83
4468	5	32	90	10	51	188
4470	279	337	192	280	160	1,248
4472	21	37	53	33	22	166
4474		10		17		27
4475		5	17	3	4	29
4477	31	6	6	162	38	243
4478	39	6	5	12	25	87
4479		2		2	9	13
4480	54	51	65	48	53	271
4481	3			1		4
4486	12	53	71	97	65	298
4487	287	272	154	155	96	964
4488	19		111		38	168
4489		4	54	21	1	80
4490	184	215	140	26	132	697
4491			19	41	1	61
4492			14	117	4	135
4493				13	24	37
4496		2		1	7	10
4497		22	22	56	67	167
4570	334	433	372	198	94	1,431
4600	6	15	14	86	131	252
4601	148	94	46	169	79	536
4605	268	368	125	176	218	1,155
4606	26	151	469	141	66	853
4608	59	33	133	74	81	380
4610	667	1,038	824	876	713	4,118
4611	16	8	21	32	9	86
4612	77	16	16	12	9	130
4613	27	161	128	71	47	434
4614	21	12	51	55	328	467
4615	615	718	258	213	77	1,881
4620	23	2	24		2	51
4621	15	41	40	54	34	184

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4625	54	87	90	66	75	372
4626	27	142	157	152	92	570
4627	134	73	11	14	45	277
4630	198	270	250	204	171	1,093
4650	320	364	439	331	283	1,737
4655	701	1,037	934	812	660	4,144
4659	89	54	64		66	273
4660	418	413	310	293	324	1,758
4662	35	20	1		1	57
4670	1,298	1,601	1,514	1,232	1,038	6,683
4671	347	450	379	315	214	1,705
4673	1	3	108	4	20	136
4674	239	106	12	63	12	432
4676	45	22	6			73
4677	236	266	473	120	365	1,460
4678	9	104	44	273	3	433
4680	2,882	3,914	4,229	2,937	2,545	16,507
4694	26	2			100	128
4695	301	38		4	7	350
4697	14	2	11	16	6	49
4699	4	14	37	20	32	107
4700	593	353	272	352	565	2,135
4701	748	976	1,636	883	692	4,935
4702	603	632	685	964	1,015	3,899
4703	1,435	1,822	1,685	1,114	917	6,973
4704			9	27	15	51
4705		23	21	70	41	155
4706		3		36	26	65
4707	3		74		21	98
4709	6	7	9	211	221	454
4710	16	425	516	362	27	1,346
4711	11	137	7			155
4712	60	2		7	8	77
4713	10	10				20
4714	752	50	20	24	7	853
4715	366	678	485	364	358	2,251
4716	70	32	208	21	48	379
4717	273	418	473	304	160	1,628

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4718	213	253	162	140	134	902
4719	43	71	51	56	79	300
4720	687	903	1,147	789	461	3,987
4721	175	337	147	225	163	1,047
4722	40	52	35	54	19	200
4723	46	22	225	77	105	475
4724	9	6		68	74	157
4725	95	143	94	5	27	364
4726	13	3	56	49	47	168
4727	27	7	64	13	43	154
4728	10	19		47	1	77
4730	108	176	163	196	91	734
4731	46	53		36	22	157
4732	12		26	26	13	77
4733		1	13	13	9	36
4735	50	48	59	61	21	239
4736					1	1
4737	602	724	638	513	173	2,650
4738		95	32	109	242	478
4739				45	105	150
4740	3,306	4,769	4,263	3,544	3,195	19,077
4741	179	210	417	472	655	1,933
4742	66	30	129	74	56	355
4743	1			167	468	636
4744	616	815	759	283	43	2,516
4745	122	68	411	113	64	778
4746	289	442	25	30	33	819
4750	519	525	265	21	19	1,349
4751	239	47	184	110	164	744
4753	85	37	219	42	24	407
4754	73	221	241	85	65	685
4756	68	73		59	3	203
4757	118	9		67	16	210
4798	110	13	32	139	115	409
4799	287	38	90	71	9	495
4800	239	935	892	609	238	2,913
4802	822	810	1,014	872	1,194	4,712
4804	25	22	71	39	17	174

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4805	408	532	576	468	441	2,424
4806	80	1	86	91	31	289
4807	127	269	442	341	273	1,452
4808	8	83	26	43	19	179
4809	130	91			66	287
4810	218	531	1,070	1,729	1,203	4,751
4811	245	227	118	436	72	1,098
4812	120	107	1,205	467	982	2,881
4814	1,113	1,162	1,058	693	377	4,403
4815	198	657	435	251	89	1,630
4816	96	230	600	497	457	1,880
4817	537	575	616	199	335	2,262
4818	538	746	684	365	184	2,517
4819	217	252	334	188	163	1,154
4820	506	497	448	221	285	1,957
4821	121	148	171	137	93	670
4822	25	40	43	23	11	142
4823	30	60	47	36	54	227
4824			9		3	12
4849	153	188	204	94	61	700
4850	804	1,026	760	823	517	3,930
4852	95	588	380	322	167	1,552
4854	458	268	436	257	260	1,679
4855	3	2	76	93	43	217
4856	3	11	32	69	73	188
4858	16	16	286	2	87	407
4859		17	133	17	25	192
4860	902	1,029	654	456	393	3,434
4861	139	9	229	68	88	533
4865	359	502	546	204	262	1,873
4868	593	629	176	291	305	1,994
4869	7	209	447	277	211	1,151
4870	2,770	2,819	3,050	3,155	3,088	14,882
4871	259	700	571	729	517	2,776
4872	52	153	274	144	96	719
4873	552	467	578	97	298	1,992
4876	1					1
4877	189	546	616	1,018	204	2,573

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4878	1,027	848	1,321	356	50	3,602
4879	584	1,360	974	1,372	1,482	5,772
4880	309	317	289	496	364	1,775
4881	207		292	303	238	1,040
4882			18	73	74	165
4883	320	344	367	413	369	1,813
4884	43	342	183	76	30	674
4885	96	202	152	432	52	934
4886	7	96	23	27	96	249
4887	327	62	189	2	34	614
4888	104	137	100	66	21	428
4890	37	31	11	38		117
4891		8	6	47	26	87
4892	1	2	23		26	52
4895	26	309	320	267	416	1,337
Grand Total	**50,279**	**63,393**	**66,485**	**53,349**	**45,335**	**278,839**