Legacy Meter Replacement Plan

Accelerating Smart Meter Deployment

30 June 2025

Essential Energy

essentialenergy.com.au

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Acknowledgement of Country

First Nations and our network area

The lands on which we work and live is Country for 48 First Nations – from Wiljali Country on the plains of Far Western New South Wales (NSW), to Ngarigo Country in the high Snowy Mountains and Bundjalung Country on the sub-tropical North Coast, and more First Nations across the diverse landscape that is regional, rural and remote NSW and parts of southern Queensland.

We acknowledge the Traditional Custodians of the lands on which our company is located and where we conduct our business, and we acknowledge all Aboriginal and Torres Strait Islander peoples across Australia. We pay our respects to ancestors and Elders, past, present and emerging. We are committed to honouring Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas and their rich contribution to society.

Abbreviations

Table 1 Abbreviations

ABBREVIATION/TERM	DEFINITION
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
DNSP	Distribution Network Service Provider
GLP	General Lights and Power
FSP	Field Service Provider
LMRP	Legacy Meter Replacement Plan
MC	Metering Coordinator
MP	Metering Provider
NEM	National Electricity Market
NER	National Electricity Rules
OP	Off Peak
OIAI	One-In-All-In[1]
the Review	Refers to Review of the Regulatory Framework for Metering Services – Final Report
We/we/our	Refers to Essential Energy

[1] AEMC Rule Determination *National Electricity Amendment (Accelerating Smart Meter Deployment) Rule*, Clause 3.5.3, pp 39

1. Introduction and overview

A message from Essential Energy

Essential Energy is pleased to present this Legacy Metering Retirement Plan (LMRP or Plan) to the Australian Energy Regulator (AER) for assessment. Our objective in developing this plan, in collaboration with stakeholders, is to provide all customers within the Essential Energy footprint with an opportunity to replace their existing legacy meters with a type 4 (smart) meter in a timely, cost-effective, fair and safe way within the acceleration period. This Plan has been influenced by stakeholder preferences, considering location, capability and capacity to meet the Plan objectives.

This Legacy Metering Retirement Plan (LMRP) has been prepared in response to the Australian Energy Market Commission's (AEMC) final determination on the Accelerating smart meter deployment rule change, published in November 2024. The Rule change sets out how Distribution Network Service Providers (DNSPs) work with Retailers, Metering Coordinators (MCs), and other stakeholders to develop a plan outlining which legacy meters will be replaced, and when.

We look forward to engaging further with stakeholders as the rollout of smart meters in Essential Energy's footprint continues.

Essential Energy Network Area

Essential Energy builds, operates and maintains one of Australia's largest electricity distribution networks, providing a vital service to over 900,000 customers across regional, rural and remote communities.

Our **network footprint** covers 95 per cent of New South Wales (NSW) and parts of southern Queensland, traversing 737,000 square kilometres of diverse landscape from the desert to the coast, across alpine to sub-tropical.

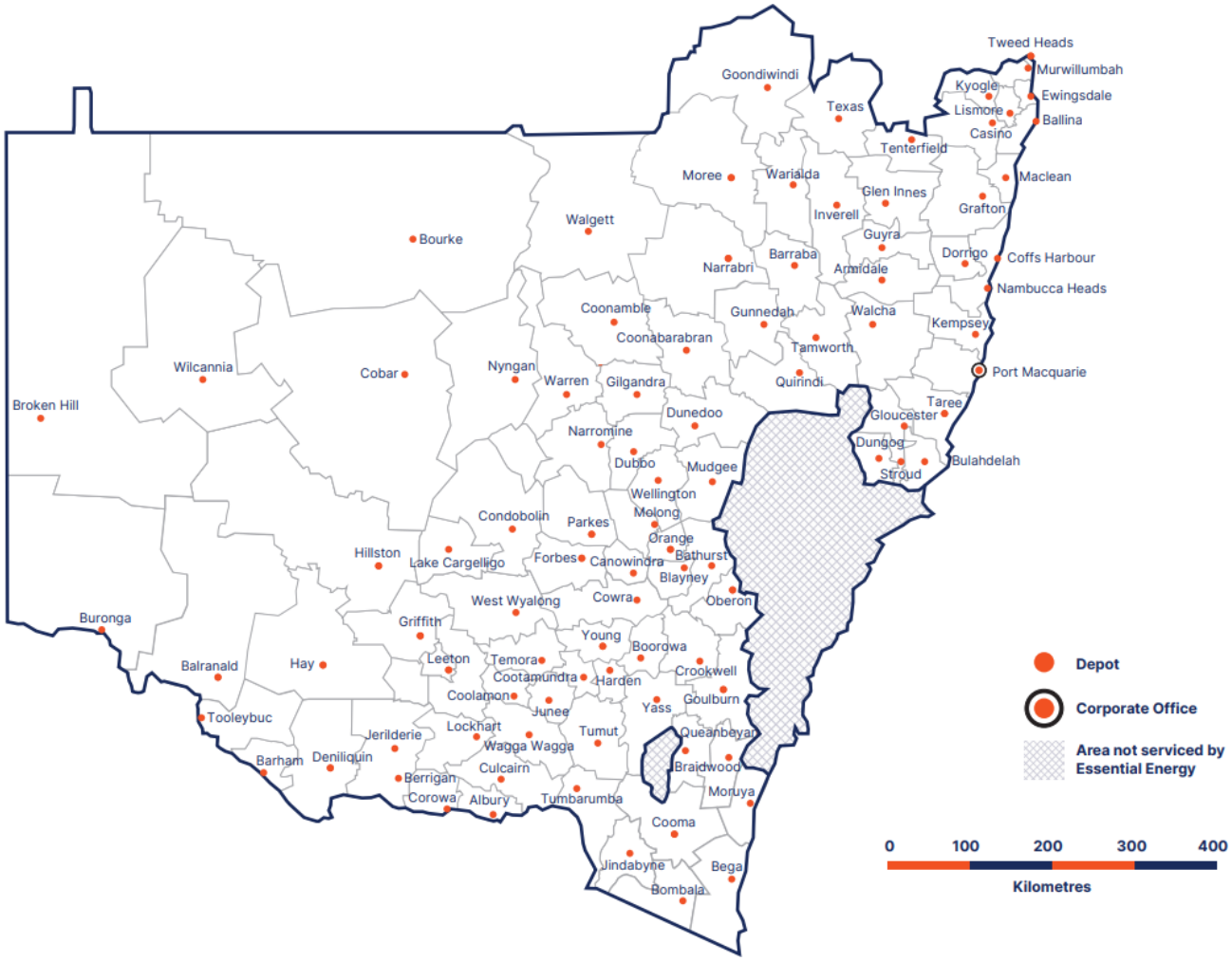


Figure 1 Network map

About this Legacy Meter Replacement Plan

The AEMC has made a Rule that all legacy meters that DNSPs currently maintain in the National Electricity Market (NEM) must be replaced with a smart meter by 1 December 2030. To facilitate a smooth transition, Essential Energy consulted with affected stakeholders to develop a LMRP detailing the replacement schedules in accordance with the LMRP objective and principles (shown below).

Essential Energy's LMRP has been socialised with Retailers and MCs and is provided to the AER no later than 30 June 2025. The AER will then either issue a resubmission notice to Essential Energy or approve the LMRP by 29 August 2025.

The smart meters will be deployed by registered MCs and Metering Providers (MPs) as directed by each customer's retailer.

LMRP Objective

The replacement of all existing legacy meters with a type 4 smart meter in a timely, cost-effective, fair, and safe way, during the LMRP period which is 1 December 2025 to 30 November 2030.

LMRP Principles[2]

- **Approximately 15–25 per cent of legacy meters should be planned for replacement in each interim period**

  An interim period is a 12 month period commencing 1 December within the LMRP period, with the first period commencing on 1 December 2025 until 30 November 2025. This principle provides clear guidance for DNSPs and affected parties when developing LMRPs and ensures the replacement program is not back ended. This would mitigate the risk that retailers do not have enough time to address unforeseen issues by the 2030 completion of the acceleration period.

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

  DNSPs should consider grouping installations by postcodes, zone substations, and/or meter reading routes to support coordination and delivery efficiencies.

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

  DNSPs are required to consult with key stakeholders, identify relevant concerns with the draft LMRP, and address those concerns in the LMRP proposal to the AER. Stakeholders are expected to help shape the replacement profile to ensure it is achievable.

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

  DNSPs are required to consider how the parties will utilise local work forces in a way that avoids moving installers every year or creating a local boom-bust cycle. Considering labour market conditions for electricians and the supply of metering components in the LMRPs would help retailers meet their obligations.

See How the LMRP Objective and LMRP Principles have been applied (section 2) for Essential Energy's approach to the development of our Plan

[2] AEMC Rule Determination *National Electricity Amendment (Accelerating Smart Meter Deployment) Rule*, pp 12-13

Background

In August 2023, the AEMC published their self-initiated *Review of the Regulatory Framework for Metering Services – Final Report*[3] (the Review), the AEMC's key recommendation was the target of universal smart meter deployment in the NEM by 2030. Following completion of the final report, a rule change request was submitted by Intellihub, SA Power Networks and Alinta Energy to the AEMC on 29 September 2023 to implement a framework that would accelerate the deployment of smart meters[4] to all customers by 2030.

The AEMC initiated a fast-tracked rule-making process[5] for this rule change request, given:

- the request was consistent with the relevant recommendations of the Review
- the AEMC consulted extensively with stakeholders on the relevant recommendations during the Review.

Feedback provided to the AEMC during the consultation phase following the rule change request identified that there needed to be better consumer protections in place. This resulted in an extension being applied and the final determination published on 28 November 2024 outlining the framework for the accelerated smart meter deployment which is further explained in the Table 2 Roles and responsibilities section below.

Roles and responsibilities

Essential Energy and other DNSPs, retailers and MCs play a specific role in relation to the implementation of the LMRP to ensure success during the accelerated deployment of smart meters.

Table 2 Roles and responsibilities

STAKEHOLDER	ROLE	RESPONSIBLITIES
Essential Energy (DNSPs)	To collaboratively develop a legacy meter replacement plan which will be provided to retailers to assist in achieving universal smart meter deployment by 2030	▸ Essential Energy must develop a LMRP in accordance with the LMRP Objective and Principles ▸ Essential Energy must consult and develop a LMRP in collaboration with affected stakeholders ▸ Essential Energy must ensure stakeholder needs are balanced and meet long-term interests of consumers ▸ Following AER approval of submitted LMRPs, Essential Energy must provide meter replacement schedules to affected retailers and MCs ▸ Essential Energy is required to record relevant LMRP details in MSATS by 27 November 2025[6] for affected NMIs ▸ Essential Energy is required to make interim targets available in MSATS to

3 AEMC Review of the regulatory framework for metering services, final report, 30 August 2023

4 Accelerating smart meter deployment, Rule Change Request, 22 September 2023

5 AEMC, Changing the energy rules – a unique process | AEMC

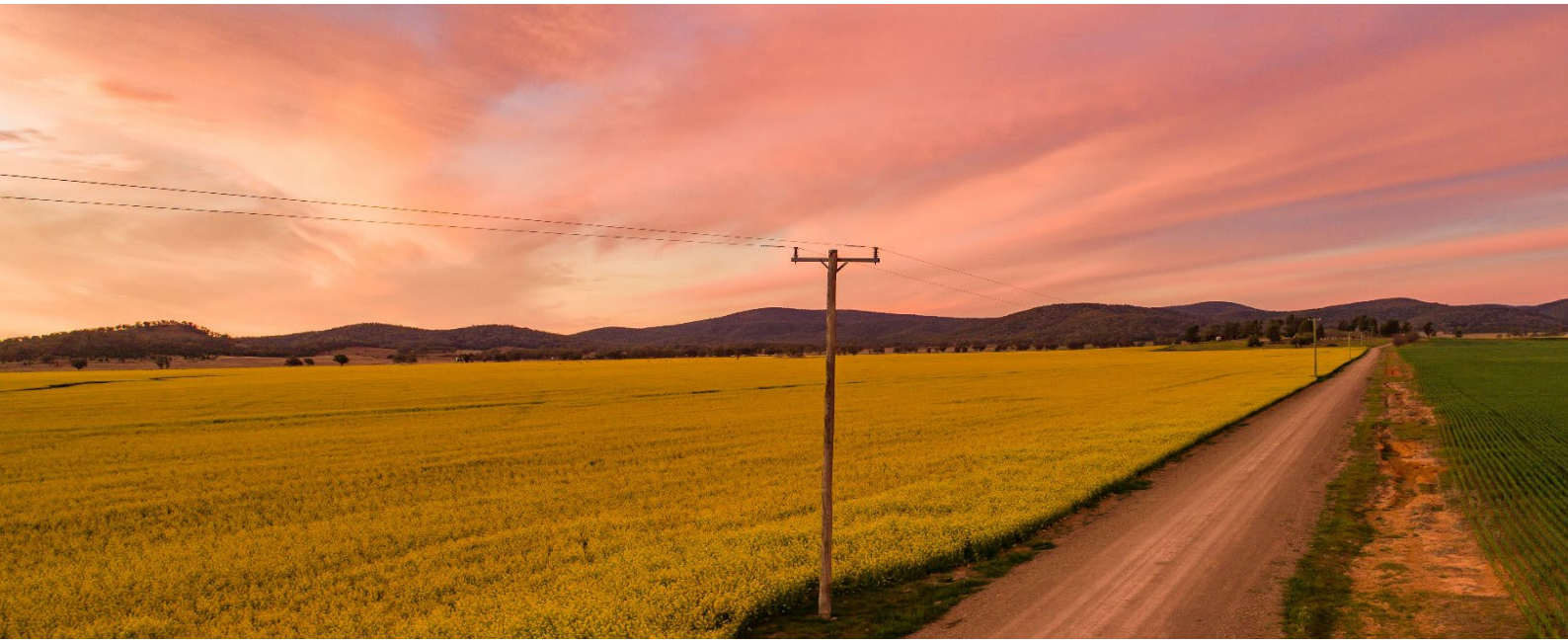
6 Dependent on AEMO updating MSATS to allow LMRP to be uploaded

STAKEHOLDER	ROLE	RESPONSIBLITIES
		each affected retailer the day before each interim period commences[7]
Retailers	To implement the LMRP and work with metering parties to achieve universal smart meter deployment by 2030	▸ Retailers to coordinate with DNSPs, MCs and MPs to implement the plan ▸ Retailers to appoint MCs to arrange for meters to be upgraded in line with schedules developed by DNSPs ▸ Retailers are responsible for communicating with their customers ahead of a scheduled meter exchange ▸ Retailers are responsible for informing customers of any defect/s identified and requesting the customer remediate the site to prepare for the meter exchange ▸ Retailer would have discretion on how and when to replace a legacy meter in each 12 month block ▸ Retailers required to report performance against the LMRP schedules to AER ▸ Retailers will have the ability to seek amendments to the LMRP but only if the LMRP is affected by a material error or a change in circumstances or events
Metering Coordinators	To liaise with retailers and meter providers to coordinate the resourcing and installation of smart meters to achieve universal smart meter deployment by 2030	▸ MCs to arrange for meters to be upgraded by qualified technicians in line with the LMRP (as directed by the relevant retailer) ▸ MCs will be exempt from sample testing and inspecting legacy meters during the LMRP period. Testing will still be required when individual meter tests are requested ▸ MCs are required to notify the Retailer of defect/s identified on site ▸ MCs are required to record defect information in MSATS

[7] AEMC Rule Determination National Electricity Amendment (Accelerating Smart Meter Deployment) Rule, pp 67

STAKEHOLDER	ROLE	RESPONSIBLITIES
Metering Providers	To work with retailers, MCs and field staff to achieve universal smart meter deployment by 2030	▸ MPs are responsible for the installation of smart meters under direction from the relevant retailers and MCs
AER	To provide approval of LMRP proposals developed by DNSPs	▸ Once the DNSP submits their LMRP by 30 June 2025, the AER must either issue a resubmission notice to the DNSP or approve the LMRP by 29 August 2025
AEMO	To review and update MSATS and any associated processes to specify the information that must be recorded by a DNSP in relation to an approved LMRP	▸ AEMO to make amendments to MSATS, metering procedures and processes in relation to the LMRP by 26 October 2025

2. Approach to the development of the LMRP



How the LMRP Objective and LMRP Principles have been applied

Below is a visual representation of how Essential Energy has considered the overall LMRP objective and principles, using the Leeton depot as an example.

In the following Figure 2, Leeton depot LMRP breakdown, only NMIs with legacy meters in the selected depot area[8] are shown and this is the same for all NMIs in our LMRP schedules.

As shown in the following, the whole depot area is selected, and the LMRP replacement schedule takes into consideration all locations including regional customers outside of the town centre. NMIs are split as evenly as possible across all meter route types in the area to ensure fairness amongst consumers regardless of their rural, semi-rural or town location. Efficiencies are also gained by following well established meter routes across Essential Energy's network area. Years 1 and 5 of our LMRP reflect lower migration rates than the middle years to allow for a simpler transition for all market participants upon commencement of the

[8] Data shown excludes NMIs where a smart meter has already been installed

Plan on 1 December 2025. By keeping migration rates in the final year low, there is an opportunity to "mop up" sites with legacy meters that may not have been completed in their prior scheduled year.

Safety considerations have also been applied throughout the development of Essential Energy's LMRP and is further explained in Safety considerations below.

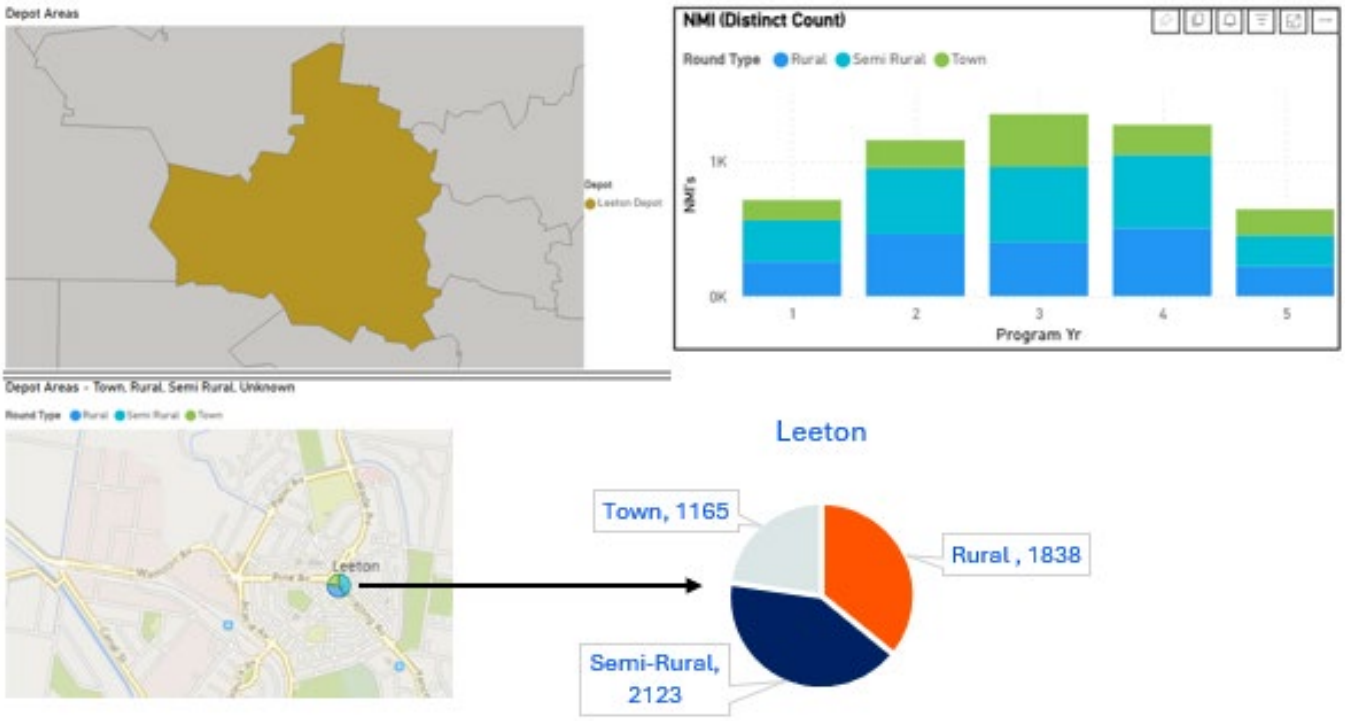


Figure 2 Leeton depot LMRP breakdown

Essential Energy's original LMRP, as presented to affected industry participants, divided NSW into three areas – Central, Coastal and Southern.

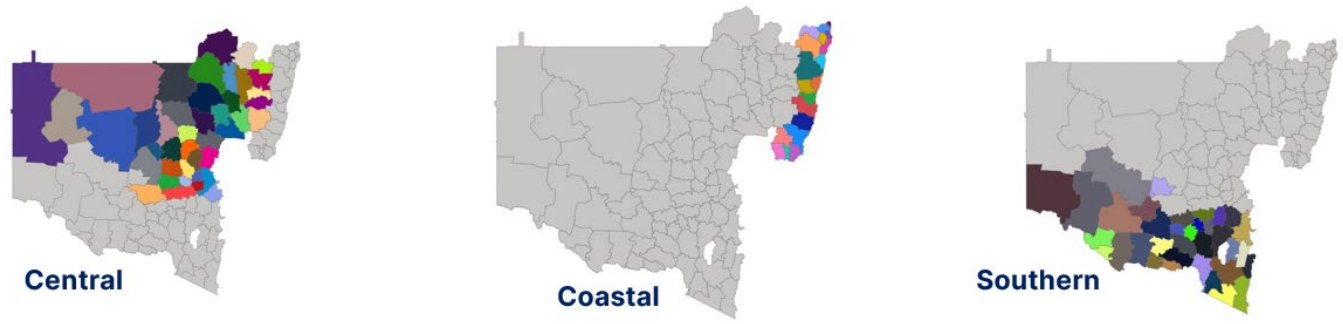


Figure 3 Screenshot from initial LMRP approach

The intention in the original LMRP was to complete the migration for whole depot areas simultaneously throughout the LMRP period before moving onto the next area. Feedback received during early consultation indicated that our initial LMRP strategy was not cost effective nor did it allow for efficiencies in workforce planning or provide cost savings for MPs. Customer feedback also raised concerns that regional areas may not get the same attention as urban areas and as a result may not benefit equally from the smart meter rollout.

Based on the feedback received early in the development of our LMRP, Essential Energy revised its approach and looked to redevelop its LMRP replacement schedules based on well-established meter reading routes

within Essential Energy's footprint. NMIs with legacy meters to be replaced have been broken down and classified as town, rural and semi-rural[9] to align with existing meter reading routes for all depot areas. This approach better aligned with the LMRP objective and principles to ensure an efficient, balanced and fair rollout to all customers including those in regional areas.

Approximately 15–25 per cent of legacy meters should be planned for replacement in each interim period.

Essential Energy has developed its LMRP using the following breakdown in line with the AEMC's *National Electricity Amendment (Accelerating Smart Meter Deployment) Rule*.

We have kept numbers low in the first year to allow for process changes and mobilisation. In addition to these considerations, feedback received from retailers and MCs indicated their preference for a lower number of sites in the first year.

The last year has also been kept low to allow for sites that may flow onto following years due to potential access or remediation issues. Natural attrition will also contribute to the overall reduction in the number of legacy meters to be replaced during the LMRP period.

As shown below, Essential Energy's footprint covers 95 per cent of New South Wales and parts of southern Queensland. The blue dots represent NMIs in our network with legacy meters requiring a smart meter phased across the LMRP period.

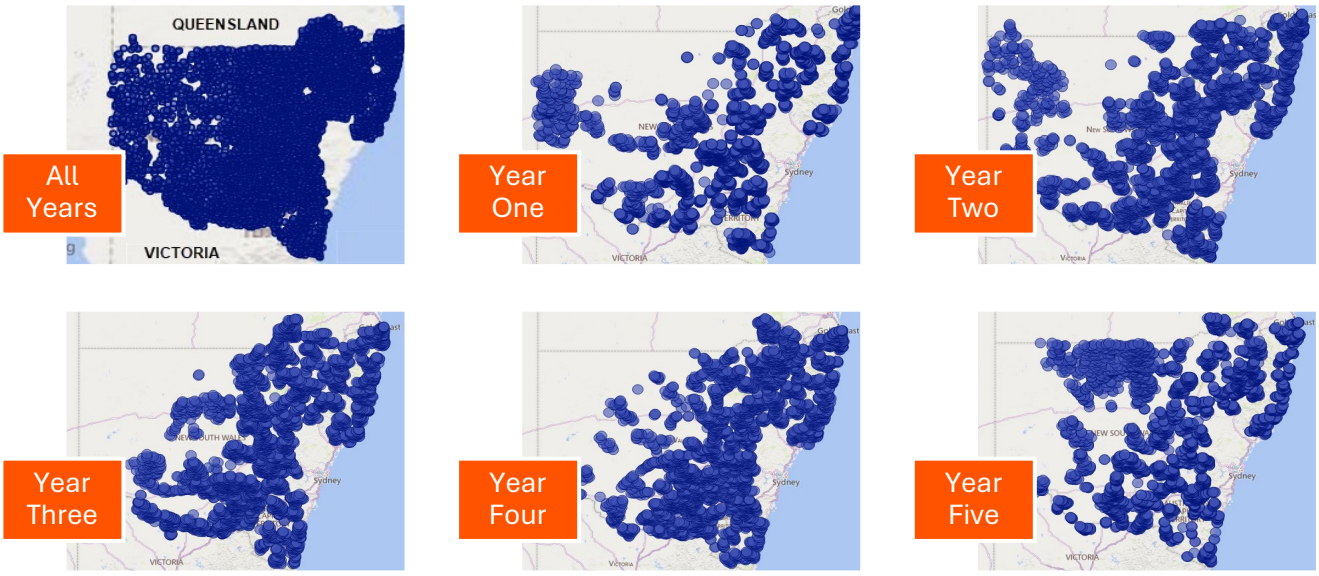


Figure 4 NMIs to be replaced under Essential Energy's LMRP

The following table breaks down the planned number and percentage of NMIs to have a smart meter installed in Essential Energy's network area for the LMRP period.

[9] Classification is based on meter reading route type, this is an internal classification

Table 3 NMI replacement percentages in Essential Energy's network area

	YEAR 1 *1 DEC. 2025 TO 30 NOV.2026*	YEAR 2 *1 DEC. 2026 TO 30 NOV.2027*	YEAR 3 *1 DEC. 2027 TO 30 NOV.2028*	YEAR 4 *1 DEC. 2028 TO 30 NOV.2029*	YEAR 5 *1 DEC. 2029 TO 30 NOV.2030*	TOTAL
NMIs[10] to have meter/s replaced in Essential Energy's network area for each interim period	55,761	101,836	101,298	102,433	54,412	**415,740**
	13.4%	24.5%	24.4%	24.6%	13.1%	**100%**

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

To ensure overall coordination and efficiencies of the LMRP, Essential Energy have undertaken significant consultation to understand affected market participants requirements and constraints. (See section 3 How we engaged with stakeholders).

Through our consultation, Essential Energy found that the initial plan we presented didn't align with affected market participants contingent workforce and would have resulted in their contractors moving on each year to another area of the state. Essential Energy revised its plan to better align with requirements based on the feedback received, taking the following into consideration:

- Allocated meter replacements in town, rural and semi-rural[11] areas to ensure that all customers benefit from the rollout
- Incorporated meter reading routes by depot level to allow for better coordination and deployment efficiencies
- Spread the delivery of meter replacements across the whole of Essential Energy's footprint for the duration of the LMRP period 1 December 2025 – 1 December 2030 (with exception to Essential Energy constraints relating to Forbes and Broken Hill – see Frequency Injection Plants – Forbes and Broken Hill.

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

Based on feedback from affected market participants, the following concerns were raised:

- Customer impacts

There is a lack of funding available to customers if a defect is identified and remediation is required. Defects may be raised against a customer's installation by a MP if there are issues identified such as insufficient space to install the smart meter or in some cases wiring which would require work to allow the smart meter to be installed. There is significant risk that customers' existing legacy meters will not be replaced with a smart meter due to customers who are reluctant to, or cannot afford to, fund remediation of their metering installation, impacting the target of 100% smart meter penetration by 2030. The costs of remediation for customers will be a significant impediment to achieving 100% smart meter deployment in Essential Energy's network area. This impediment is likely to be much greater than our mostly metropolitan based counterparts given the higher proportion of vulnerable customers in regional and remote areas as identified by the 2021 Census.[12]

Feedback received during the initial consultation and engagement phase also indicated the benefits of upgrading to a smart meter have not been clearly articulated to customers. Improvements in this space will be required to ensure customers are adequately informed of direct impacts from the accelerated smart

[10] Based on data current as of 16 June 2025

[11] Classification is based on meter reading route type, this is an internal classification

[12] ABS, Statistics | Australian Bureau of Statistics

meter deployment. We understand that the AEMC intends to release customer communications in relation to the benefits of the smart meter rollout and LMRP ahead of the 1 December LMRP commencement.

- Locked meter boxes and industry keys

At present, a significant number of customer meter boxes are secured by an Essential Energy issued key. These keys only allow customers access to their own meter box. Using a master keying system, it allows meter readers, emergency services and Essential Energy to access all meters in locked boxes as required. Essential Energy are working internally to arrange access to keys for MPs. Conversations outside of LMRP consultation will be undertaken with relevant parties.

- Access to remote/island areas, customer hazards

For specific access or customer information, Retailers, MCs and MPs can request a Site Access Request in accordance with the B2B Procedure CSDN Process[13]. Essential Energy will provide a Site Access Notification in response to a valid Site Access Request.

Essential Energy also intends to conduct regular meetings with affected participants throughout the LMRP period to provide an opportunity for MCs to advise us on sites where they are having access issues so, where possible, we can assist.

- Shared fuse multi-occupancy sites

Shared amongst most stakeholders we consulted with are reservations surrounding the proposed One-In-All-In (OIAI) approach as set out in the AEMC determination.

Co-ordination, time frames, stand downs and onsite safety were identified as some of the potential issues with the Shared Fuse Meter Replacement Procedure (Procedure)[14] as outlined in the final determination which was published 28 November 2024.

Essential Energy conducted trials following the OIAI procedure to further flush out improvements and a way forward that works for all participants ahead of the accelerated smart meter deployment period commencement. See Shared Fuse OIAI Trials for further details.

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

Based on feedback received from MCs, their contingent work force is situated throughout Essential Energy's footprint. The revised meter replacement schedule takes this into account and each year a selected number of meters will be replaced in each depot area. This will ensure local work forces are utilised for the whole duration of the accelerated rollout as opposed to a creating a boom-bust cycle each year if we were to complete a depot area at a time. The exceptions to this are Forbes; planned for completion in year 1 of the LMRP and Broken Hill and Wilcannia which are planned for completion in years 1 and 2. See Frequency Injection Plants – Forbes and Broken Hill.

Completing smart meter rollouts by meter reader routes will provide significant efficiency benefits as it will optimise the rate of reduction in meter reading costs and allow for transient workforces to be deployed to specific regions. Furthermore, the meter routes have been constantly improved over decades as the most efficient way to attend all meter sites and as such provide the most optimal way for meter replacements to be conducted from an efficiency perspective.

[13] AEMO | Business-to-business procedures

[14] AEMC, Rule determination accelerating smart meter deployment, p39

3. Consultation and Engagement

How we engaged with stakeholders

Our stakeholder engagement methods in relation to the development of the LMRP

Essential Energy undertook internal analysis of available data to identify our key stakeholders and inform our engagement plan.

Essential Energy engaged early, collaborating with multiple stakeholders both internally and externally to develop our LMRP. Most of our engagement was specifically in relation to the development of our Plan with additional consultation and collaboration with retailers and MPs regarding multi-occupancy shared fuse sites and the proposed OIAI Procedure.

Commencing in March 2024, Essential Energy employed a hybrid approach of face to face as well as virtual engagement conducted over several months. We have gained valuable feedback from affected participants including internal staff, customer groups, retailers as well as MPs/MCs, which has guided the direction for our LMRP.

Essential Energy engaged with our Customer Advocacy Group (CAG) during initial development of the LMRP to identify key customer groups and gather their feedback. Main areas for concern included customer remediation costs, the OIAI procedure for shared fuse sites and the potential for rural and remote areas to not be included in the acceleration.

To ensure all customers receive the benefit of a smart meter installation, we have planned the rollout in our LMRP to ensure an even split where possible over the five years of the accelerated deployment period to include rural, semi-rural and town customers in all areas. The exception to this is Forbes, Broken Hill and Wilcannia as detailed in Frequency Injection Plants – Forbes and Broken Hill. Essential Energy's role in achieving universal deployment of smart meters by 2030 is to develop a LMRP which considers impacted stakeholders. We engaged early in the process and extensively with various stakeholder groups including retailers, MCs and MPs as well as customer groups and internal staff throughout the development of the Plan. As shown below, Essential Energy's consultation efforts to develop our LMRP has exceeded 450 hours to date with future meetings scheduled. This level of consultation facilitated collaboration and development of the LMRP which aligned expectations from both business and consumer perspectives as well as resourcing for MPs and their ability to achieve the proposed targets as set out in the annual schedules.

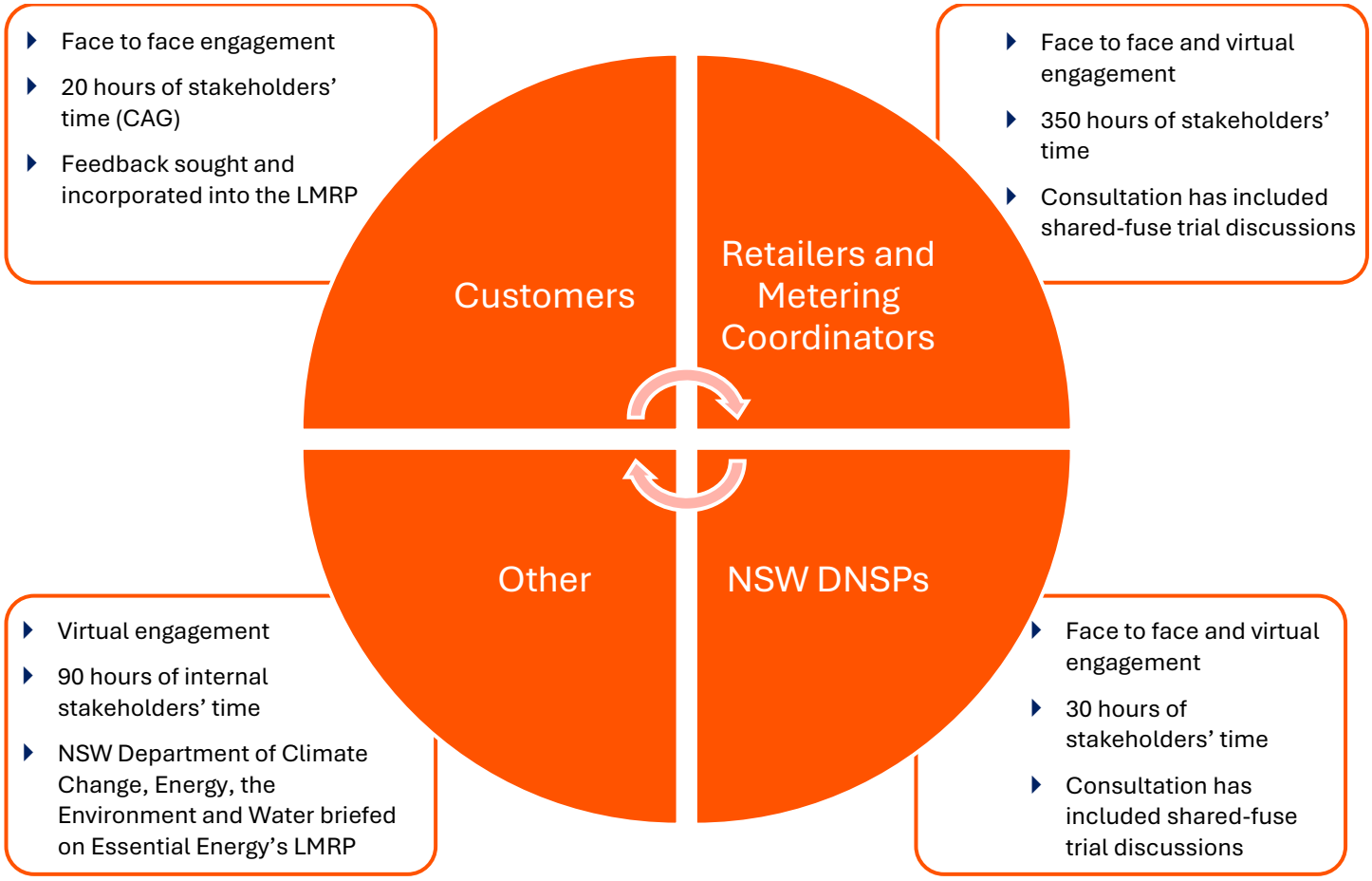


Figure 5 Consultation summary

Shared Fuse OIAI Trials

Essential Energy OIAI trial #1

Focusing on the meter replacement component of the Procedure, Essential Energy engaged and collaborated with retailers and MCs as a group to initiate a controlled shared fuse OIAI trial. A site was chosen where multiple retailers were affected which resulted in different MCs being involved. The purpose of the initial consultation and subsequent trials was to further explore the procedure and the practicality in real-life scenarios.

Multiple options were discussed prior to the trial as the Procedure does not appear to take into consideration safety aspects such as minimising exposure to asbestos with multiple people working on a board, impacts to customers and field technicians by extended outages with responsibility for the overall coordination on the day unclear.

For this trial, stakeholders, including Essential Energy, retailers, and MCs, concurred that installing the Meter Protection Device (MPD) solely on the day of the DNSP outage would be the most efficient approach for conducting the OIAI. Essential Energy planned for an eight-hour outage, although feedback during consultation indicated that it was unlikely the whole outage time would be required since only the MPDs would be installed on the day.

Retailers, MCs, and MPs agreed that the most practical process would be to allocate specific time slots for each MC to attend and install an MPD on the day of isolation. This approach would allow for individual isolation at each premise resulting in shorter outage times for customers.

Power was restored after approximately three and a half hours, with fourteen MPDs installed. A second visit was required for an outage at each individual customer's premise to install their smart meter. This resulted in a total outage time of approximately four hours per customer. Compared to at least eight hours or more to install both the MPD and smart meter during the DNSP isolation. Within a week, MPs had successfully deployed all smart meters on site.

The trial was deemed an overall success. Customer feedback indicated a preference for two shorter outages over one or more longer outages. This process proved effective for switchboards with sufficient space for MPD installation without requiring reconfiguration. Minimal challenges were encountered, aside from a failed MPD upon re-energisation. The failed MPD was installed by a technician who had the first time slot and was not on-site during re-energisation. This highlighted the need for all MPs to be present during re-energisation.

Unfortunately, the AEMC has removed the option of MPD installation solely on the day of the DNSP outage in the final rule. Essential Energy continues to consult with stakeholders to identify alternative methods to ensure the success of the OIAI.

Before

After

Figure 6 Trial one site, the after photo shown was taken during the installation of the last smart meters on the board

Essential Energy OIAI trial #2

Continuing from the learnings gained from the first trial, Essential Energy engaged retailers and MCs to undertake additional OIAI trials. Four separate sites were selected and rectification carried out over consecutive days at three out of the four sites, progressively getting more complex. The site selected for day four was abandoned on the day due to the complexity although rectified at a later date following more planning and consultation with retailers and MPs.

<table>
<tr><th>DAY 1 - SITE 1</th><th>DAY 2 - SITE 2</th><th>DAY 3 - SITE 3</th><th>SITE 4</th></tr>
<tr><td>All Field Service Providers (FSPs) on site by 7:15am</td><td>All FSP on site by 7:30am, this included additional delegates from all MPs</td><td>Two MPs involved, FSPs on site by 7:30am</td><td rowspan="3">All participants arrived on site early to assess and evaluate the board. EE arrived on site to isolate the power, although following extensive conversation, all FSP agreed that the job shouldn't go ahead with the following concerns raised:
Looped neutrals – unable to test the integrity of the neutrals for meters left unchanged
All meters would have needed to be removed, and neutrals tested
More planning required to successfully change out meters – outage over 3 days proposed
Planned outage dates 13, 14, 15 May 2025</td></tr>
<tr><td>Eight units in total plus amenities meter to be changed out. Two boards with 17 meters across the two – timeclocks present.</td><td>12 units in total with both General Lights and Power (GLP) and Off Peak (OP), plus amenities meter to be replaced – 25 meters in total</td><td>12 units in total with both GLP and OP, plus amenities meter to be replaced – 25 meters in total</td></tr>
<tr><td>Power out at 8:00am and danger tagged by Essential Energy</td><td>Switch room was full of gardening equipment, FSPs worked together to make the room safe</td><td>Two boards – one in a switch room, the other on a separate building with vegetation surrounding it</td></tr>
<tr><td>Field Service Providers (FSPs) 3 worked collaboratively to install MPDs on both switch boards</td><td>Three MPs involved with all meters to be replaced in the switch room. FSPs worked together to develop a plan for the day</td><td>Two boards allowed FSPs to work independently on each board and swap once each other was done</td><td>Second attempt to remediate
Additional MP involved for second attempt at this site – four MPs in total.
All arrived on site early the morning of the first day to develop a work plan.</td></tr>
<tr><td>Service neutral link installed – removed linked neutral</td><td>Power out at 8:00am and danger tagged by Essential Energy</td><td>Power out at 8:05am and danger tagged by Essential Energy</td><td>35 customers in total, with both GLP and OP, plus amenities meter to be replaced – 70 meters in total</td></tr>
</table>

DAY 1 - SITE 1	DAY 2 - SITE 2	DAY 3 - SITE 3	SITE 4
Feedback received was that the linked neutrals at this site would not be seen as a defect as all meters were being removed and smart meters installed on the day	FSPs worked collaboratively throughout the day installing MPDs, meters	All meters installed by 12:30pm	Three consecutive outages were undertaken to enable the complex works required to install smart meters at this site.
	All meters installed by 12:15pm	Essential Energy returned to restore power at approximately 1:00pm	FSPs worked collaboratively to achieve maximum efficiency
Essential Energy restored main power at approximately 12:30 following all installs	Essential Energy restored main power at approximately 1:00pm following all installs		No customer complaints received
Essential Energy restored main power at approximately 1:00pm following all installs			All meters installed by 10:30am on the final day

Day One

Day Two

Day Three

Day Four

Figure 7 Pictures show switchboards prior to smart meter installation from OIAI trial two

Essential Energy's approach to OIAI and complex sites

Essential Energy acknowledges the importance of continuing to support affected participants during the accelerated smart meter deployment period, this was prevalent in OIAI trials undertaken.

Throughout the OIAI trials that Essential Energy facilitated, it was identified that DNSPs will be required to play a role in the coordination and organisation in some OIAI sites as well as complex single site premises (e.g. surgery clinics, childcare centres, etc.) where it may not be a shared fuse but requires additional planning and assistance from the DNSP such as out of hours outage times or specific access instructions for remote sites. To assist and ensure the successful deployment of smart meters across our network,

Essential Energy propose to conduct regular meetings with affected participants to provide an opportunity to identify and manage complex or hard to access sites throughout the LMRP period.

Prior to all trials undertaken, meetings were held with all retailers and MCs involved to allow for the successful deployment of smart meters at selected sites. Follow up and feedback meetings were also facilitated to understand what went well as well as identify areas for improvement.

Shared fuse premises remain a high risk to achieving 100% smart meter deployment and is a shared concern among not only DNSPs but MCs and retailers alike. Significant coordination will be required in some OIAI cases and continued collaboration across affected participants will be essential to achieve a successful outcome.

NSW DNSP/MC Collaboration - OIAI

Following the OIAI trials facilitated by Essential Energy, feedback received from external field technicians and their management requested that a meeting be set up between DNSPs and MCs to further understand expectations and requirements when participating in a OIAI scenario.

This feedback was taken on board by NSW DNSPs and the first face-to-face meeting was set between NSW DNSPs and MCs to discuss OIAI challenges and how we are going to work together to achieve success. The meeting highlighted the importance for consistency across DNSPs where possible although also identified that there are areas where processes still need to be established internally, which will be an ongoing process.

Safety considerations

Essential Energy staff conducting the de-energisation and re-energisation tasks at OIAI sites are qualified to perform works required on the network. All staff ensure adherence to the National Electricity Rules (NER) and Electricity Safety Rules in line with Essential Energy's commitment to ensuring the safety for everyone in our community when working on the network.

In 2016 the NSW Office of Fair Trading, NSW distribution businesses, metering providers, and the National Electrical and Communications Association (NECA) developed a code for the safe installation of direct-connected electricity metering in NSW. This code has been enforced since July 1, 2016. All MPs must comply with this code which is enforced by NSW Fair Trading.

Essential Energy will assist MCs, MPs and retailers by ensuring all hazard information when identified is updated in our systems so it can be accessed through the B2B process.

Essential Energy will also be conducting information and awareness initiatives via our CAG and at several landholder and community events that Essential Energy attends. These efforts will ensure customers are aware that individuals other than Essential Energy employees will be visiting their premises to conduct meter exchanges and provides information on how they can assist by ensuring safe accessibility to their meter boxes.

Monitoring and reporting

Essential Energy will establish processes to monitor performance against both the LMRP and the rate of defected sites across our network area. This will allow Essential Energy to identify trends and provide visibility of how the accelerated rollout is tracking against plan in our footprint, and updates will be provided in our annual compliance reports.

4. Stakeholder Feedback

Stakeholder feedback and responses

The following pages provide a high-level summary of what we heard and how we have responded in subsequent engagement steps and in this LMRP.

Table 4 Stakeholder feedback

WHAT WE HEARD	HOW WE ARE RESPONDING	HOW THIS IS REFLECTED IN OUR LMRP
Preference for Essential Energy to plan work across the entire footprint for the duration of the LMRP	Essential Energy reworked our initial LMRP to better align with the contingent workforce of MPs. In the initial LMRP presented by Essential Energy, we had planned to proceed by splitting the state into three sections and completing smaller sections over the 5 years. Given previous feedback received, spreading the LMRP over Essential Energy's footprint over 5 years gave the ability for MCs and MPs to utilise local resources. This also ensures that local resources are available for any fault and emergency works that may arise after a customer's smart meter has been installed, ensuring prompt fault rectification and good customer service.	Essential Energy's revised LMRP has scheduled meter replacements across our network extending over the five years of the plan in most areas. Meter routes have been used to gain efficiencies and minimise cost. **Essential Energy internal constraints** We require the remediation of Forbes and Broken Hill to be completed in Year one and Years one and two respectively and are unable to spread these areas out over the five years of the LMRP. Wilcannia has also been scheduled in these years based on feedback Essential Energy received during consultation.
Preference for low numbers in the first and last year of the plan	Essential Energy agrees with scheduling a lower number of meters for replacement in the first year to allow for process changes and mobilisation.	Essential Energy revised our first LMRP to decrease the numbers from 20% for the first year based on feedback received. The first year of the LMRP will see approximately 15% of meters in Essential Energy's footprint scheduled for replacement. Years two, three and four will ramp up with year five kept low to ensure that the last year of the LMRP is not too inflated and gives allowance for any sites not completed in the prior years.

WHAT WE HEARD	HOW WE ARE RESPONDING	HOW THIS IS REFLECTED IN OUR LMRP
Shared concerns relating to the AEMC's Shared fusing meter replacement procedure (One-In-All-In)	Essential Energy has engaged with retailers, MCs and MPs to organise trials ahead of the LMRP commencement. The purpose of the trials is to identify solutions to achieve the best outcome in these installations. Further discussions following Essential Energy's second OIAI trial resulted in face to face meetings between NSW DNSPs and MCs being facilitated to allow for collaboration and consistency across agencies.	Details of trials undertaken are included in our LMRP. Essential Energy OIAI trial #1 and Essential Energy OIAI trial #2 above.
Will Essential Energy's LMRP allow for flexibility in the scheduled years for meter replacements?	Essential Energy understands that some retailers/MCs may want to accelerate ahead of the scheduled year which we support although request that multi-occupancy shared fuse sites **NOT** be accelerated ahead of their scheduled year to avoid resourcing issues for Essential Energy staff to facilitate planned interruptions on site.	Replacement schedules have been provided to retailers and MCs. See DNSPs should have regard to the impact of LMRPs on retailers and other affected stakeholders
Shared concerns relating to customer remediation costs	Customers cannot be compelled to remediate defects at their metering installation although Essential Energy acknowledge costs associated with remediation may be a barrier to achieving 100 per cent smart meter deployment.	Customer costs associated with remediation are out of Essential Energy's control although our response has been highlighted in section 2 - DNSPs should have regard to the impact of LMRPs on retailers and other affected stakeholders. Retailers, MPs and MCs will follow the defect procedure as outlined in the final determination[15] to manage customer defects.

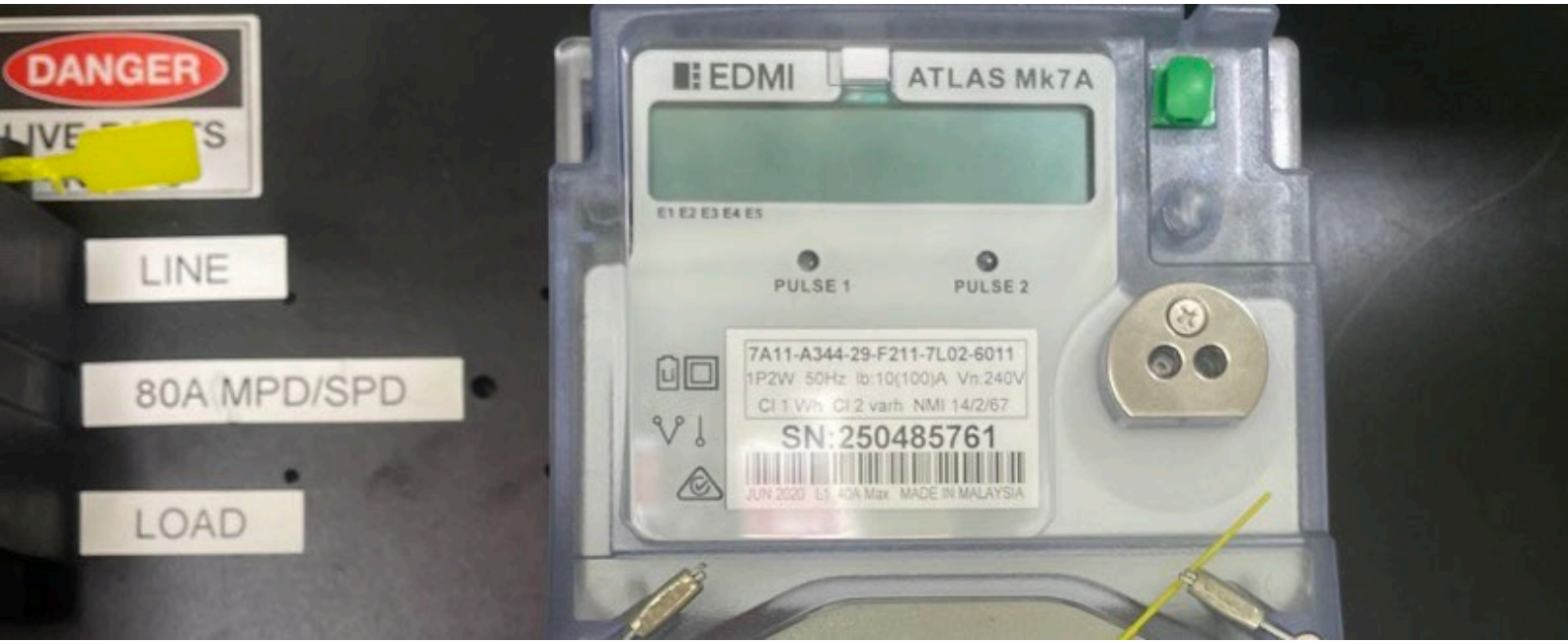
[15] AEMC, final determination – Accelerating smart meter deployment, Clause 3.5.4, p.42

WHAT WE HEARD	HOW WE ARE RESPONDING	HOW THIS IS REFLECTED IN OUR LMRP
Can Essential Energy provide access to industry keys?	Essential Energy are working internally on an arrangement for our industry key access.	Although our position remains unchanged at the time of publication of this document, Essential Energy are undertaking internal discussions relating to access to industry keys.
Can DNSPs consider allowing MCs to access depots as part of rollout?	Essential Energy is unable to provide access to depots for individuals other than Essential Energy staff.	MCs will need to source alternative arrangements; providing access to Essential Energy depots is not something we're able to assist with.
Will any more Meter Family Failures be uploaded into the market?	As outlined in the Final Determination - Accelerating smart meter deployment[16], MCs will be exempt from testing legacy meters during the LMRP period.	Essential Energy will not be uploading any meter family failures into the market ahead of the LMRP commencement and for its duration. Individual meter failures, however, will continue to be uploaded into the market.
Concerns that rural and remote area customers will not be included in the LMRP	Essential Energy has taken all affected customers into consideration during the development of our LMRP. This includes remote and rural customers in our network area.	Essential Energy's revised LMRP has scheduled meter replacements across our network including rural and remote areas extending over the five years of the plan. The exception to this is Forbes, Broken Hill and Wilcannia which are planned to be completed within the first two years of the LMRP.
Can Essential Energy identify unique meters in their network area?	Essential Energy can provide estimated volumes although they are not 100% accurate and based off available data.	Based on available information, Essential Energy have provided an estimate of unique meters in Section 4 - Unique metering types and configurations Specific NMIs with unique metering installations are identified in the draft LMRP schedules provided to Retailers.

[16] AEMC, final determination – Accelerating smart meter deployment, Clause 3.6, p.45

WHAT WE HEARD	HOW WE ARE RESPONDING	HOW THIS IS REFLECTED IN OUR LMRP
Can Essential Energy provide site specific information in their LMRP data? Eg: Hazards, coordinates etc.	For specific access or customer information including hazards, Retailers, MCs and MPs can request a Site Access Request in accordance with the B2B Procedure CSDN Process. Essential Energy will provide a Site Access Notification in response to a valid Site Access Request.	Please see DNSPs should have regard to the impact of LMRPs on retailers and other affected stakeholders.
Can Essential Energy provide shared fuse information in their LMRP data?	Essential Energy has been transparent throughout consultations regarding our shared fuse data. We are unable to provide this information as we do not have reliable data to share.	NA
Can Essential Energy confirm source data for the draft LMRP schedules?	Data included in Essential Energy's draft LMRP sent to retailers and MCs was accurate as of 14/02/25. Data shows legacy meters **only** in Essential Energy's footprint requiring replacement. Retailers received schedules specific to their customers and MCs received an overall view of numbers in February 2025 with data sourced primarily from Eddis system. It is noted that an error on page 22 of Essential Energy's draft LMRP did state the data was current as of 14/01/25. This should have been 14/02/25 as was correct at the time of publication of our draft LMRP. All totals in the draft plan are subject to change and will be updated ahead of our LMRP submission to the AER.	Please see Approximately 15–25 per cent of legacy meters should be planned for replacement in each interim period.
Will Essential Energy be able to provide after-hours support to meet shared fuse customer's needs? Eg: Surgery clinics, childcare centres, etc?	Essential Energy can provide after-hours support to assist in the facilitation of meter exchanges for small businesses such as clinics, childcare centers etc.	Please see Essential Energy's approach to OIAI and complex sites

5. Smart Meter Rollout Profile



Smart meter rollout profile

Table 5 Legacy meters to be replaced in Essential Energy's network area

	YEAR 1 *1 DEC. 2025 TO 30 NOV.2026*	YEAR 2 *1 DEC. 2026 TO 30 NOV.2027*	YEAR 3 *1 DEC. 2027 TO 30 NOV.2028*	YEAR 4 *1 DEC. 2028 TO 30 NOV.2029*	YEAR 5 *1 DEC. 2029 TO 30 NOV.2030*	TOTAL
Legacy Meters for replacement in Essential Energy's network area for each interim period[17]	86,610	158,277	160,042	162,296	87,172	**654,397**
	13.3%	24.2%	24.4%	24.8%	13.3%	**100%**

Based on data current as of 16 June 2025, there are **654,397** legacy meters to be exchanged across Essential Energy's network area. It is acknowledged that years one and five fall slightly below the prescribed minimum 15%, this is due to the plan following meter routes to allow for maximum efficiencies when replacing legacy meters. Further to this, Essential Energy constraints to complete Forbes, Broken Hill and Wilcannia in the first two years of the plan and Master Subtractive Metering (MSM) sites which are planned in the final 18 months of the LMRP have contributed to this.

Rollout schedules provided to retailers in February specified legacy meters and corresponding NMIs to be replaced in each interim period of the replacement period in Essential Energy's network area.

MCs' rollout schedules provided an overview of all meters to be replaced in each interim period of the replacement period in Essential Energy's network area based on main depot location, postcodes and meter routes.

Essential Energy will record the relevant details in MSATS by 27 November 2025 as per the MSATS procedure.

Example Schedules

Draft LMRP schedules were provided to Retailers and MCs by 20 February 2025. Feedback received from MCs requested we update our layout of their schedules to align with other DNSPs. A revised MC schedule was sent to all affected MCs 12 March 2025, the example below in Table 7 Metering coordinators schedule example is the revised version sent to MCs.

Table 6 Retailers schedule example

NMI	RETAILER	DEPOT	METER_ROUTE	TOWN	METER NO	REGISTER_NO	POSTCODE	TGTDTE	LMRP YEAR	2 RATE METER	PLUG-IN METER	TURTLE METER	MSM SITE	>5000KWH/YEAR CL

Table 7 Metering coordinators schedule example

YEAR	POST CODE	TOWN	# NMIS	# METERS	PHASE
20XX	1234	XXXXXX	XX	XX	1-phase

[17] Data current as of 16 June 2025

Unique metering types and configurations

Master Subtractive Metering (MSM)

A master subtractive meter arrangement is a way of measuring electricity usage that is not compliant with the current rules framework. It involves a 'master' meter at the point where electricity enters the property or properties, and subtractive meters further along the network. Subtractive meters are typically used to measure the usage of hot water systems, under floor heating, water pumps and sheds.

Essential Energy is working to ensure all non-compliant master subtractive meter installations are compliant through a separate program of work[18] which is planned for completion by June 2029. This work involves rectifying the metering configuration to remove the master/subtractive meter relationship at each site which then allows the legacy meters to be replaced with smart meters.

The replacement of the legacy meters at the rectified MSM sites have been planned in the final 18 months of the LMRP and are identified in the draft LMRP schedules provided to Retailers. At the time of publication of this document, there were approximately **7,500** MSM sites in our footprint. It is expected that through attrition and smart meter install on approximately 90% of sites at the time of rectification, the remaining number to be replaced under this LMRP is likely to be low.

2 rate Hi/Lo meters

A two-rate meter, also known as a dual rate meter or hi/lo, is an electricity meter that charges different rates during peak and off-peak periods.

Essential Energy has approximately **1,600** hi/lo meters in our footprint, affected NMIs have been identified in the draft LMRP schedules provided to Retailers.

Turtle meters

Turtle meters are a type of metering installation measuring electricity usage and are read by sending signals over the powerlines to a receiver that sits within a zone substation. They have been typically installed in remote areas with limited telecommunications and are in the following towns within Essential Energy's footprint:

- Argoon
- Barringun
- Bourke
- Brewarrina
- Byrock
- Carrathool
- Cobar
- Coleambally
- Collerina
- Coolabah
- Enngonia
- Fords Bridge
- Gongolgon
- Goodooga
- Gumbalie
- Gunderbooka
- Hay
- Hay South
- Louth
- Mabins Well
- North Bourke
- Tarcoon
- Tilpa
- Walgett
- Wanaaring
- Weilmoringle
- White Cliffs
- Yantabulla

Essential Energy has approximately **1,100** turtle meters in our footprint, affected NMIs have been identified in the draft LMRP schedules provided to retailers. Installation of new meters at these sites is no different to any other meter exchange and disposal of these meters will be the same as all other meters exchanged during the rollout.

[18] Master Subtractive Metering Rectification (essentialenergy.com.au)

Plug in meters

Essential Energy has approximately **76,000** plug in meters in our footprint, affected NMIs have been identified in the draft LMRP schedules provided to retailers.

Sites to be remediated by Essential Energy

There is a small number of meter sites that Essential Energy are planning to remediate due to specific safety risks and costs associated. The funding for the Essential Energy remediations has been approved as per our Regulatory proposal submitted in November 2023 for the regulatory period commencing July 2024[19].

- Meter Boxes on Conductive poles with co-located SWER and Substations and or Reactors
- Sites with Current Transformers on Cross arms
- Multiphase sites with only a single phase being metered

We consider that these three types of meter remediation costs need to be met by Essential Energy. These works can best be described as high cost when compared to the likely average cost of sites requiring remediation but also have the additional components of being high risk and/or non-compliant metering sites. Essential Energy plan to complete all remediation work by 1 December 2029 to allow for the completion of smart meter installs under the LMRP.

Essential Energy Constraints

Frequency Injection Plants – Forbes and Broken Hill

Essential Energy have internal constraints relating to the frequency injection plants in Forbes and Broken Hill. This has resulted in the requirement to accelerate smart meter deployment in these areas over year one and years one and two respectively of the LMRP. Based on feedback from affected participants, we have also planned Wilcannia in the first two years due to the remote location.

[19] Essential Energy, 2024 - 29 Revised Regulatory Proposal, p57

Other factors that may impact the accelerated smart meter rollout

Poor telecommunications coverage

Essential Energy customers do not experience universal telecommunications coverage and as a result, there will be some limitations to the availability of telecommunications networks for some customers metering installations. Essential Energy has used recorded GPS coordinates from all of our customers meter installations and have worked with Telstra to get predicted coverage of these metering installations by Telstra's CATM1 network.

Below is a heat map showing the spread of no coverage areas across Essential Energy's network[20]

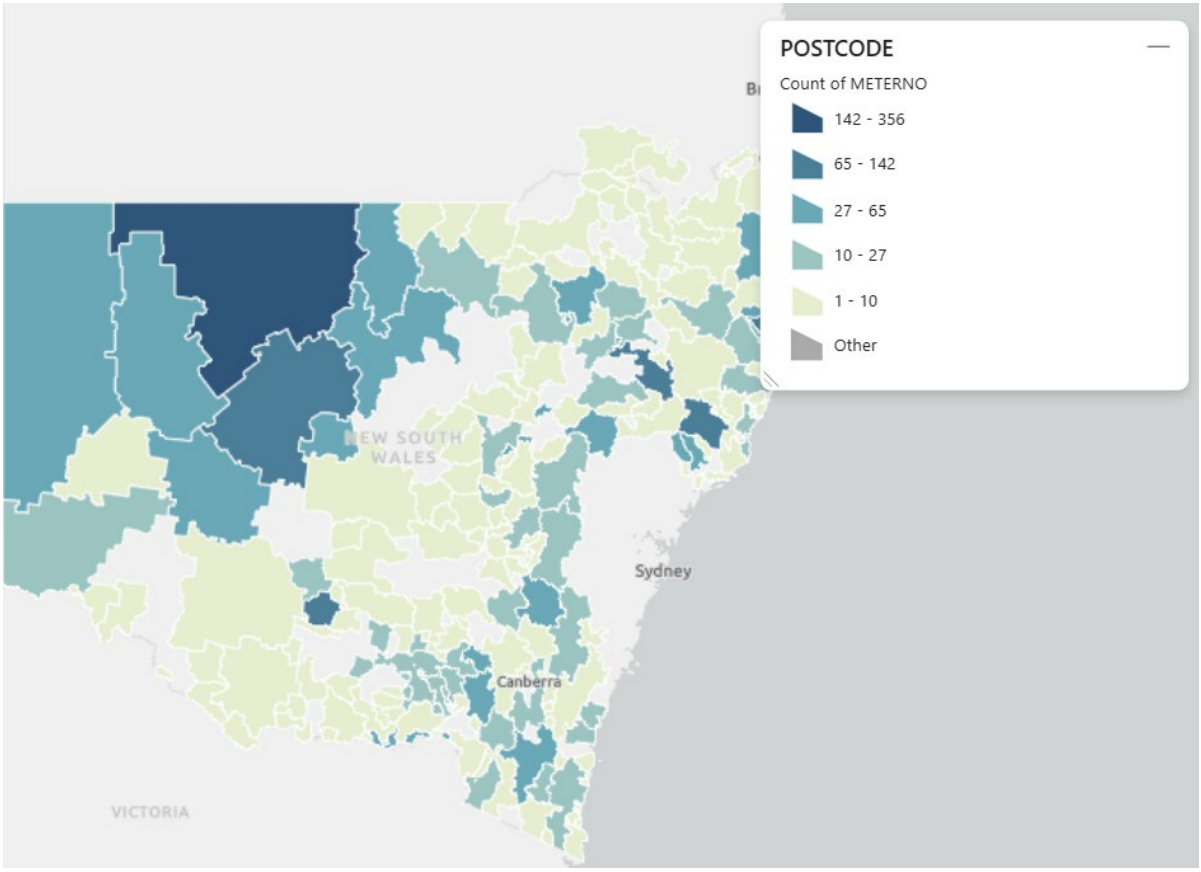


Figure 8 Telstra predicted no coverage NMI's by Essential Energy Depot areas

It should be noted that these are predictions made by Telstra internal systems, coverage will likely be worse than the prediction due to locations of meter installations on customer owned buildings where the building may block the path to the cellular towers and therefore reduce the predicted signal level for the meter installation location.

Customer remediation works

Essential Energy's network is unique and differs across our footprint. It is anticipated that there will be a reasonably high amount of customer remediation works required in our network due to the age of some customer installations.

We acknowledge that at this time, there is no funding available to assist customers who may be required to remediate before a smart meter can be installed. Essential Energy has provided specific feedback to this

[20] Data current as of 16 June 2025

point and feel that customer remediation works will have the most impact negatively affecting 100% smart meter penetration in our network area.

Meter providers differing interpretation of defects at a customer installation

During consultation with MPs and their field staff both before and after Essential Energy OIAI trials, it has been observed that there are differing interpretations of what constitutes a defect at a customer's switchboard.

To assist in the identification of defects, the Competitive Metering Industry Group (CMIG) developed a defect identification form to be used at the scoping stage at a OIAI premise. Looped neutrals is one of the items that, if observed at a site, would become a wiring defect with the customer responsible for remediating before a smart meter can be installed. The looped neutrals did not affect work on the OIAI trial days although highlighted that this may not be an actual defect as in many cases it can be fixed on the day with minimal extras.

Appendix A: Overall LMRP schedule – Essential Energy Network Area

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
Central	**Total**		**19,365**	**32,742**	**30,365**	**31,741**	**18,796**	**133,009**
	Central	**Total**	**2,842**	**1,602**	**1,691**	**1,871**	**1,101**	**9,107**
		Condobolin Depot	72	287	313	334	248	**1,254**
		Forbes Depot	2,194			128	112	**2,434**
		Parkes Depot	455	861	947	941	483	**3,687**
		West Wyalong Depot	121	454	431	468	258	**1,732**
	Macquarie	**Total**	**6,056**	**11,687**	**12,429**	**13,159**	**7,259**	**50,590**
		Bathurst Depot	1,674	2,579	3,114	3,254	1,741	**12,362**
		Blayney Depot	108	418	488	422	277	**1,713**
		Canowindra Depot	50	304	305	217	284	**1,160**
		Dubbo Depot	1,358	2,220	2,304	2,495	1,368	**9,745**

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
		Dunedoo Depot	230	406	521	465	274	**1,896**
		Molong Depot	80	287	281	443	246	**1,337**
		Mudgee Depot	738	1,617	1,583	1,547	722	**6,207**
		Narromine Depot	240	513	454	761	446	**2,414**
		Oberon Depot	92	396	398	312	318	**1,516**
		Orange Depot	1,270	2,246	2,381	2,399	1,078	**9,374**
		Wellington Depot	216	701	600	844	505	**2,866**
	North Western	**Total**	**3,736**	**5,582**	**2,145**	**2,506**	**2,622**	**16,591**
		Bourke Depot	94	268	276	262	765	**1,665**
		Broken Hill Depot	2,954	3,285				**6,239**
		Cobar Depot	100	345	300	455	255	**1,455**
		Coonamble Depot	165	219	323	456	448	**1,611**
		Gilgandra Depot	52	260	314	333	354	**1,313**
		Nyngan Depot	27	141	250	257	272	**947**
		Walgett Depot	222	452	506	415	330	**1,925**
		Warren Depot	75	215	176	328	198	**992**

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
		Wilcannia Depot	47	397				**444**
	Northern Tablelands	**Total**	**4,874**	**9,952**	**9,755**	**10,289**	**5,355**	**40,225**
		Barraba Depot	80	513	296	520	245	**1,654**
		Coonabarabran Depot	267	538	499	594	336	**2,234**
		Goondiwindi Depot	393	630	930	775	447	**3,175**
		Gunnedah Depot	350	764	645	754	396	**2,909**
		Inverell Depot	407	968	1,044	1,087	550	**4,056**
		Moree Depot	330	802	721	937	339	**3,129**
		Narrabri Depot	344	584	719	623	377	**2,647**
		Quirindi Depot	338	756	651	670	477	**2,892**
		Tamworth Depot	2,123	3,404	3,364	3,283	1,445	**13,619**
		Texas Depot	110	449	209	457	339	**1,564**
		Walcha Depot	78	311	279	288	198	**1,154**
		Warialda Depot	54	233	398	301	206	**1,192**
	Ranges	**Total**	**1,267**	**2,776**	**3,170**	**2,651**	**1,676**	**11,540**

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
		Armidale Depot	828	1,667	1,834	1,662	737	**6,728**
		Glen Innes Depot	214	577	559	563	360	**2,273**
		Guyra Depot	45	169	291	98	305	**908**
		Tenterfield Depot	180	363	486	328	274	**1,631**
	Riverina Slopes	**Total**	**590**	**1,143**	**1,175**	**1,265**	**783**	**4,956**
		Cowra Depot	590	1,143	1,175	1,265	783	**4,956**
Coastal	**Total**		**18,310**	**34,450**	**33,774**	**33,410**	**15,701**	**135,645**
	Coastal	**Total**	**6,121**	**12,625**	**11,725**	**11,714**	**5,408**	**47,593**
		Ballina Depot	1,437	2,335	2,452	2,509	1,075	**9,808**
		Ewingsdale Depot	968	2,392	2,097	2,099	986	**8,542**
		Grafton Depot	652	1,360	1,543	1,207	831	**5,593**
		Maclean Depot	512	1,174	1,061	1,085	461	**4,293**
		Murwillumbah Depot	564	1,115	1,180	1,136	567	**4,562**
		Tweed Heads Depot	1,988	4,249	3,392	3,678	1,488	**14,795**
		Total	**10,576**	**18,772**	**19,024**	**18,746**	**8,842**	**75,960**

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
	Mid North Coast	Bulahdelah Depot	317	841	928	899	385	**3,370**
		Coffs Harbour Depot	2,103	3,405	4,188	3,738	1,478	**14,912**
		Dorrigo Depot	232	466	433	539	237	**1,907**
		Dungog Depot	291	553	503	656	315	**2,318**
		Gloucester Depot	101	491	340	449	333	**1,714**
		Kempsey Depot	936	1,699	1,983	1,649	1,031	**7,298**
		Nambucca Heads Depot	570	1,070	1,134	1,153	493	**4,420**
		Port Macquarie Depot	2,846	4,964	4,142	4,522	2,215	**18,689**
		Stroud Depot	39	141	206	162	131	**679**
		Taree Depot	3,141	5,142	5,167	4,979	2,224	**20,653**
	Ranges	**Total**	**1,613**	**3,053**	**3,025**	**2,950**	**1,451**	**12,092**
		Casino Depot	395	869	797	790	387	**3,238**
		Kyogle Depot	268	362	503	408	338	**1,879**
		Lismore Depot	950	1,822	1,725	1,752	726	**6,975**

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
South	**Total**		**18,086**	**34,644**	**37,159**	**37,282**	**19,915**	**147,086**
	Central	**Total**	**1,662**	**3,362**	**3,321**	**3,384**	**2,015**	**13,744**
		Griffith Depot	815	1,599	1,451	1,577	716	**6,158**
		Hay Depot	28	266	344	163	262	**1,063**
		Hillston Depot	54	161	112	140	219	**686**
		Lake Cargelligo Depot	54	182	68	238	176	**718**
		Leeton Depot	711	1,154	1,346	1,266	642	**5,119**
	Murray	**Total**	**4,377**	**8,296**	**9,214**	**8,957**	**4,422**	**35,266**
		Albury Depot	2,457	4,352	4,464	4,180	1,713	**17,166**
		Balranald Depot	42	213	224	226	168	**873**
		Barham Depot	41	185	282	218	250	**976**
		Berrigan Depot	366	714	1,015	837	433	**3,365**
		Buronga Depot	281	618	601	576	420	**2,496**
		Corowa Depot	446	408	778	957	264	**2,853**
		Culcairn Depot	193	471	431	673	371	**2,139**

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
		Deniliquin Depot	481	1,156	1,194	1,138	553	**4,522**
		Tooleybuc Depot	70	179	225	152	250	**876**
	Riverina Slopes	**Total**	**3,760**	**7,613**	**8,145**	**8,271**	**4,727**	**32,516**
		Boorowa Depot	75	155	359	208	307	**1,104**
		Coolamon Depot		210	188	167	214	**779**
		Cootamundra Depot	133	352	408	472	233	**1,598**
		Harden Depot	63	295	222	301	322	**1,203**
		Junee Depot	25	308	398	288	258	**1,277**
		Lockhart Depot	21	189	59	277	249	**795**
		Temora Depot	76	450	395	512	233	**1,666**
		Tumbarumba Depot	38	226	241	214	221	**940**
		Tumut Depot	511	877	1,063	902	532	**3,885**
		Wagga Depot	2,290	3,751	3,901	3,948	1,608	**15,498**
		Young Depot	528	800	911	982	550	**3,771**
	South Eastern	**Total**	**8,287**	**15,373**	**16,479**	**16,670**	**8,751**	**65,560**

PROGRAM YR			1	2	3	4	5	TOTAL
ROLLOUT GROUP	AREA	DEPOT	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)	NMI COUNT (DISTINCT)
		Bega Depot	1,449	2,722	2,710	2,735	1,146	**10,762**
		Bombala Depot	48	284	255	250	168	**1,005**
		Braidwood Depot	60	171	388	201	341	**1,161**
		Cooma Depot	258	900	865	772	657	**3,452**
		Crookwell Depot	144	384	303	565	474	**1,870**
		Goulburn Depot	1,117	2,177	1,813	2,651	1,170	**8,928**
		Jindabyne Depot	495	484	1,692	681	835	**4,187**
		Moruya Depot	2,189	3,492	3,638	3,768	1,547	**14,634**
		Queanbeyan Depot	2,028	3,889	3,976	3,885	1,769	**15,547**
		Yass Depot	499	870	839	1,162	644	**4,014**
Total			**55,761**	**101,836**	**101,298**	**102,433**	**54,412**	**415,743**[21]

[21] Data current as of 16 June 2025

Appendix B: Compliance checklist for plan submission to the AER for approval – June 2025

RULE REQUIREMENT	AER CONSIDERATIONS	HOW THIS IS REFLECTED IN OUR LMRP
11.177.2 Legacy Meter Replacement Plans		
(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.	Does the LMRP cover all Legacy Meters at connection points other than embedded networks	Approximately 15–25 per cent of legacy meters should be planned for replacement in each interim period. pp13 See Essential Energy's LMRP schedule which has been provided in its entirety as a separate document.
	Does the LMRP comply with the LMRP Objective, i.e. does it cover the replacement of Legacy Meters with type 4 metering installations in a manner that is timely, cost effective, fair and safe within the LMRP period	DNSPs should have regard to the overall efficiency of the LMRP, including costs and potential cost savings for affected market participants. pp14
(b) The LMRP must include a description of the planned replacement program and the process for its development, including: (1) 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; and	Does the LMRP include 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	DNSPs should have regard to appropriate and efficient workforce planning, including in regional areas. pp15 Table 3 NMI replacement percentages in Essential Energy's network area. pp14 Table 5 Legacy meters to be replaced in Essential Energy's network area pp30Table 5 Legacy meters to be replaced in Essential Energy's network area Example Schedules. pp30

RULE REQUIREMENT	AER CONSIDERATIONS	HOW THIS IS REFLECTED IN OUR LMRP
		See Essential Energy's LMRP schedule which has been provided in its entirety as a separate document.
(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;	For LMRPs that propose to replace Legacy Meters in groups (e.g. by postcode or by geographical area), does the LMRP outline: (a) The proposed grouping of Legacy Meters (b) Which groups are to be replaced in each Interim Period	DNSPs should have regard to appropriate and efficient workforce planning, including in regional areas. pp15 See Essential Energy's LMRP schedule which has been provided in its entirety as a separate document.
(2) 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; and	Does the LMRP include a description of how it is compliant with the LMRP Objective Does the LMRP include a description of how the LNSP has had regard to the LMRP Principles	How the LMRP Objective and LMRP Principles have been applied pp11 to 14
(3) 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); (ii) the relevant concerns identified as a result of that engagement; and (iii) how the Local Network Service Provider has sought to address those concerns.	Does the LMRP include a description of: (a) How the LNSP 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 they sought to address these concerns	How we engaged with stakeholders. pp16 Our stakeholder engagement methods in relation to the development of the LMRP. pp16 Essential Energy's approach to OIAI and complex sites pp22 Table 4 Stakeholder feedback. pp24 to 28
(c) In developing the LMRP, a Local Network Service Provider must have regard to the LMRP Principles, which are that:	Does the LNSP when developing the LMRP have regard to the LMRP Principles, i.e.: (a) The number of Legacy Meters planned for replacement in each Interim Period (which should be	How the LMRP Objective and LMRP Principles have been applied. pp11 to 14 See Essential Energy's LMRP schedule which has

RULE REQUIREMENT	AER CONSIDERATIONS	HOW THIS IS REFLECTED IN OUR LMRP
(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; (2) the overall efficiency of the LMRP, including costs and potential cost savings for affected Market Participants; Note For example, Legacy Meters may be most efficiently retired in geographic groupings, such as by postcode, zone substation or meter reading route. (3) the impact of the LMRP on Affected Retailers and other affected stakeholders; and (4) appropriate and efficient workforce planning, including in regional areas.	between approximately 15 – 25 per cent of the total replaced under the LMRP) (b) The overall efficiency of the LMRP including: (i) Costs (ii) Potential cost savings (for example, the plan may involve grouping by area) (c) The impact of the LMRP on Affected Retailers and other affected stakeholders (d) Appropriate and efficient workforce planning, including regional areas	been provided in its entirety as a separate document.
11.117.3 Consultation regarding Legacy Meter Replacement Plans		
(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 LRMP; (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; and (3) invite feedback on the draft LMRP	Did the LNSP: (a) Provide a draft LMRP to affected retailers (b) Provide a schedule specifying the Legacy Meters and corresponding NMIs to be replaced in each Interim Period to Affected Retailers and Metering Coordinators (c) Invite feedback on the draft LMRP By 28 February 2025 and ahead of submission of the draft LMRP to the AER	Yes, all schedules and draft LMRP submitted to relevant party's 19th and 20th February 2025. Feedback requested and responses incorporated into Table 4 Stakeholder feedback. pp24 to 28

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