Legacy Meter Replacement Plan

Proposal for Evoenergy's distribution area

Public version

June 2025

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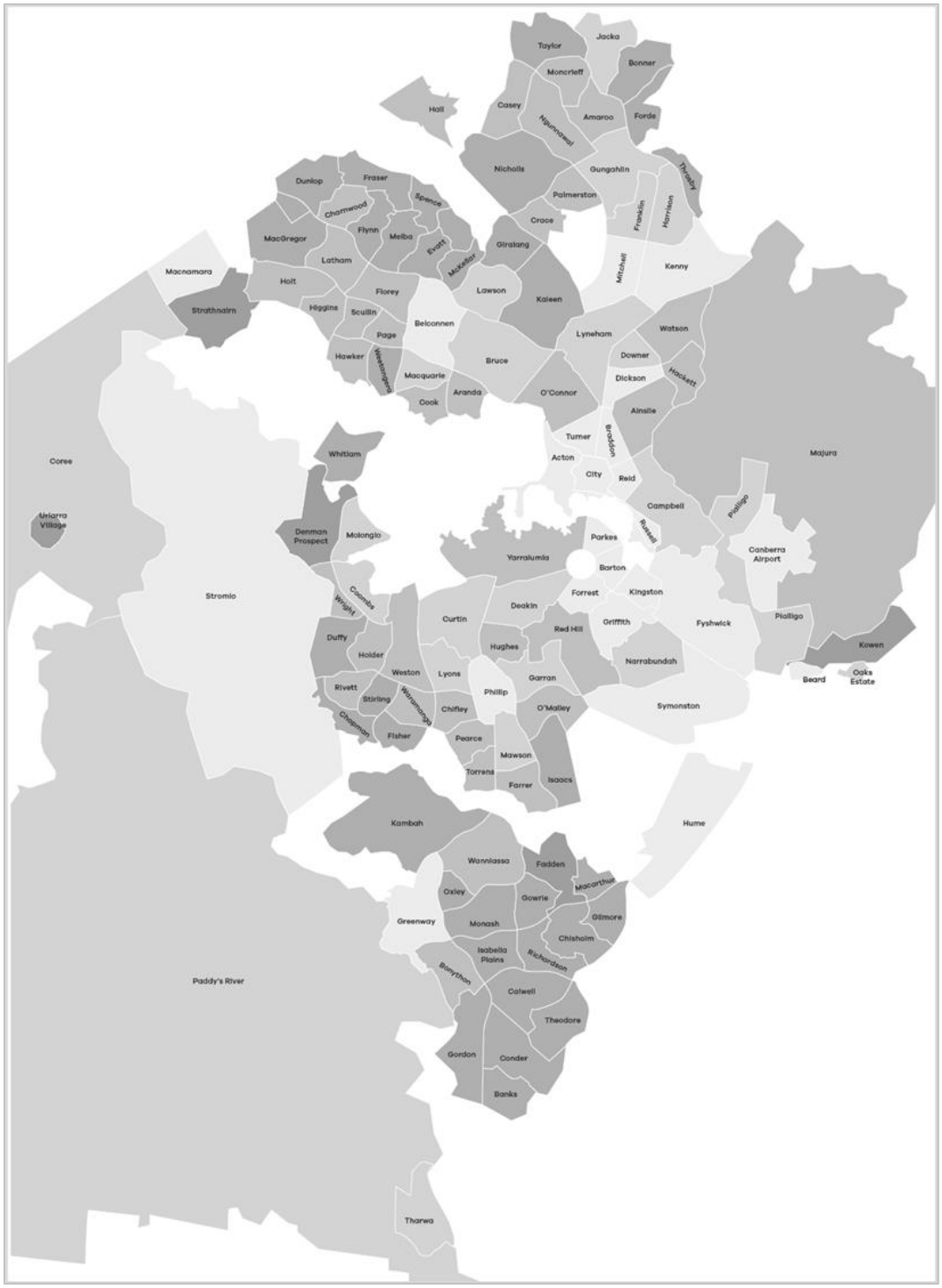
1. Introduction

Evoenergy owns and operates the electricity network in the Australian Capital Territory (ACT) and gas networks in the ACT and surrounding regions. Evoenergy also undertakes maintenance of a network of poles, wires, transformers and other equipment to distribute electricity safely and reliably, to connect new customers, plan and construct new infrastructure, and provide emergency response. The Evoenergy network is an essential part of the process of moving electricity from where it is generated to where consumers use it.

Figure 1: Evoenergy's distribution area



1.1 Purpose

The Australian Energy Market Commission (AEMC) is implementing reforms to achieve a full rollout of smart meters across the National Electricity Market (NEM) by 2030. Feedback to the AEMC supports that accelerating this rollout could provide significant benefits to consumers, including greater visibility of energy usage, enabling them to better understand and manage their electricity bills. It will also allow access to improved retail service options, providing more tailored energy solutions, and support a more efficient and reliable energy grid by facilitating better integration of distributed energy resources. To enable this transition, amendments have been made to the National Electricity Rules (NER) and National Energy Retail Rules (NERR) to support efficient smart meter deployment while ensuring adequate consumer protections.

Under the revised NER, Local Network Service Providers (LNSPs), such as Evoenergy, must develop and publish a Legacy Meter Replacement Plan (LMRP). The LMRP Objective is to replace all Legacy Meters (Type 5 and 6 metering installations) with smart meters in a timely, cost-effective, fair, and safe manner. This rollout will take place over five Interim Periods, commencing on 1 December 2025 and concluding on 30 November 2030.

Evoenergy initially engaged with Affected Retailers and Metering Coordinators (MCs), and other stakeholders, to incorporate their insights into a draft LMRP, enabling practicality and operational efficiency. Evoenergy submitted its draft LMRP to all Affected Retailers and MCs before 28 February 2025 for their review and feedback on the proposed approach. This feedback has been reviewed and, where appropriate, incorporated into the proposed LMRP before submission to the Australian Energy Regulator (AER) for approval. The proposed LMRP includes a detailed schedule specifying the Legacy Meters and National Metering Identifiers (NMIs) to be replaced during each Interim Period.

This document presents Evoenergy's proposed LMRP. The LMRP enables a structured and coordinated approach to replacing Legacy Meters with smart meters, aligning with regulatory requirements while prioritising safety, consumer benefits, efficiency and fairness.

1.2 Document Structure

This LMRP document is structured to provide a clear framework for the planned transition from Legacy Meters to smart meters within Evoenergy's distribution area. The document is divided into the following sections:

1. **Introduction** – Outlines the purpose of the LMRP, background information, and the current state of Legacy Meter replacements within Evoenergy's network.

2. **Engagement and Consultation** – Highlights Evoenergy's commitment to stakeholder engagement as fundamental components of the LMRP. This section details the extensive consultation process undertaken with Affected Retailers, MCs, government, and consumer advocacy groups. It also outlines how stakeholder feedback was incorporated into the plan.

3. **Regulatory Alignment** – This section outlines how Evoenergy's LMRP aligns with both the LMRP objective and principles outlined in the NER.

4. **Legacy Meter Replacement Plan in Detail** – Provides an in-depth explanation of the LMRP structure, including training requirements to ensure work is completed safely, ongoing engagement plan, the methodology used for suburb allocation, the Suburb Complexity Rating (SCR), and the Meter Replacement Strategy. This section also includes a list of suburbs allocated to each Interim Period.

1.3 Current State

Since the introduction of metering contestability in December 2017, Evoenergy's Legacy Meter fleet has steadily declined. The total number of Legacy Meters has reduced from approximately 202,000, in 2018, to approximately 135,000, in May 2025. This decline has been influenced by several key factors, including:

1. **Customer-Initiated Replacements** – Customers opting for meter upgrades, often to access more advanced functionalities or due to retailer-driven initiatives.

2. **Property Alterations** – Changes such as the installation of renewable energy systems (e.g., rooftop solar photovoltaics), or changing to 3-phase power that necessitate meter upgrades.

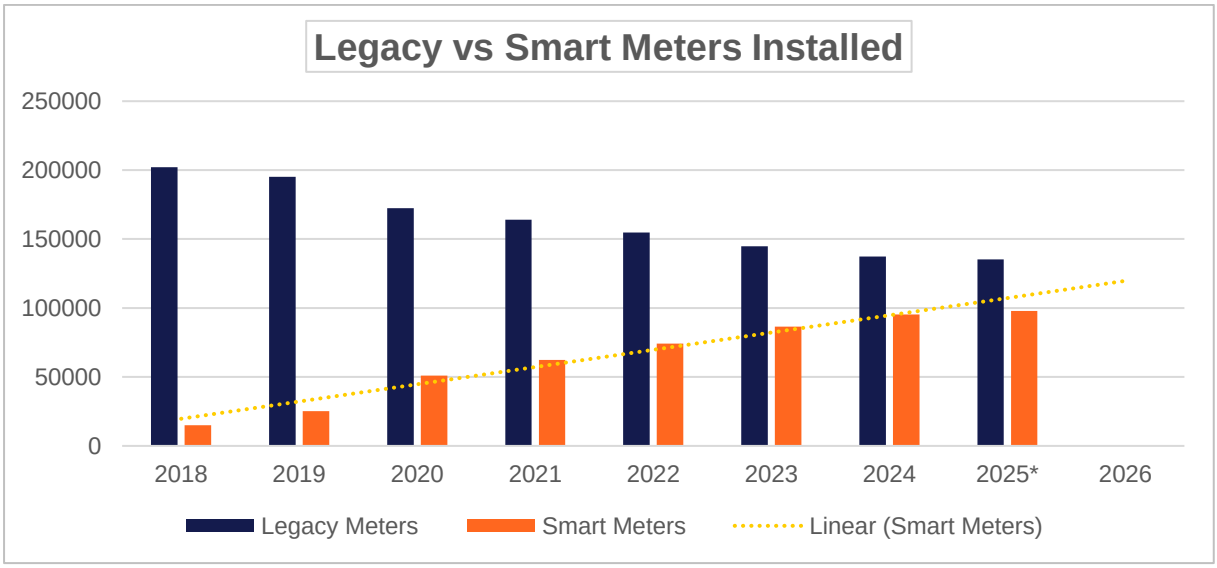
3. **Meter Family Failures** – Instances where a specific meter model is found to be faulty or non-compliant, requiring all meters of the same model to be replaced as a precautionary measure.

4. **Faulty or Damaged Meters** – Unplanned replacements triggered by defects, malfunctions, or damage identified during inspections or customer reports.

The ongoing replacement of Legacy Meters has led to a significant shift in Evoenergy's metering landscape. As illustrated in Figure 2, the number of smart meter installations has been increasing steadily, while the volume of Legacy Meters continues to decline. As of May 2025, the proportion of Legacy Meters versus smart meters in the Evoenergy distribution area stands at approximately 60% Legacy Meters and 40% smart meters.

The LMRP will further accelerate the transition from Legacy Meters to smart meters by establishing a structured and proactive approach to meter replacements. As a result, the proportion of smart meters within Evoenergy's distribution area is expected to increase at a faster rate, supporting the broader shift toward an intelligent and data-enabled electricity network.

Figure 2: Meter volumes over time



**2025 data is as at 6 May 2025*

Note: Includes meters installed for new premises as well as Legacy Meter replacements.

2. Engagement and Consultation

2.1 Consultation with Relevant Stakeholders

To develop the LMRP, Evoenergy undertook a comprehensive engagement and consultation process with key stakeholders to ensure the plan aligns with regulatory requirements, industry best practices, and consumer expectations. This process aimed to gather insights, address concerns, and foster collaboration to support a smooth and efficient transition from Legacy Meters to smart meters.

The stakeholders engaged during this process included:

- **All Affected Retailers** – Energy retailers play a crucial role in the LMRP, as they manage customer accounts and coordinate meter replacement requests with MCs. Consultation with Affected Retailers focused on scheduling, customer communication strategies, and operational alignment to minimise disruptions.

- **All Impacted MCs** – MCs are responsible for installing and maintaining smart meters. Evoenergy engaged with MCs to discuss workforce planning, training requirements, safety protocols, and logistical considerations to ensure the safe and efficient execution of the replacement program. This consultation informed a phased rollout that considers resource availability, technician capacity, and geographical distribution to maximise efficiency.

- **The ACT Government** – Evoenergy met with the ACT Government on a bi-monthly basis throughout the development of the LMRP to provide updates and share progress to ensure alignment and to maintain transparency.

- **Legacy Meter Reading Contractors** – Contractors responsible for reading Legacy Meters provided valuable insights into meter access challenges, historical replacement issues, and potential risks associated with the phase-out of legacy metering.

- **Evoenergy's Energy Consumer Reference Council (ECRC)** – The ECRC is a key advisory body that includes consumer and industry representative groups. This engagement ensured that the LMRP considered the perspectives of residential customers, business customers, and community organisations. Evoenergy has kept the ECRC informed on the LMRP and sought their feedback. Evoenergy will continue to provide updates and offer further opportunities for feedback throughout the rollout to ensure transparency and customer awareness.

2.1.1 Engagement Methods

To ensure effective communication and feedback collection, Evoenergy used multiple engagement methods, including:

- Online and face-to-face meetings to facilitate in-depth discussions.
- Stakeholder workshops and forums to encourage broader industry collaboration and gather collective feedback.
- Emails to provide detailed information and updates.
- Phone conversations for direct stakeholder queries.

This multi-faceted engagement approach ensured that stakeholders had an opportunity to contribute to the development of the LMRP, allowing Evoenergy to incorporate diverse perspectives, address operational challenges, and create a structured, well-supported rollout plan.

2.1.2 Stakeholder Engagement Principles

Throughout our engagement we have applied Evoenergy's Stakeholder Engagement Principles to support effective and genuine consultation. These engagement principles are outlined in Table 1. We value the input and cooperation of all relevant stakeholders and remain open to further feedback throughout the program. We encourage ongoing dialogue to enhance the implementation of the LMRP and to support a fair, efficient, and customer-focused rollout of smart meters across the network.

Table 1: Evoenergy's Stakeholder Engagement Principles

We are	What this means to us	What it signifies to stakeholders
Adaptive 	• Tailored approaches - no one-size fits-all • Evolving alongside the changing energy landscape	• Flexible engagement and communication to meet stakeholder needs • Engagement on your own terms
Curious 	• Enthusiasm for learning and exploring new ideas • Embracing diverse perspectives	• Your voice will be listened to and valued • Inclusive engagement practices
Courageous 	• Evaluating and enhancing our engagement practices • Initiating bold conversations and seeking input	• You can hold us accountable • We will actively seek your feedback
Transparent 	• Providing clear, precise, relevant and timely information • Openness around the purpose, scope and outcomes	• We will use plain language to help you make informed contributions • You will be able to read reports on our engagement activities, and their impact, on our website
Committed 	• Allocating time and resources for engagement • Acting with integrity - doing what we say we will do	• Our commitment is long-term – our engagement is ongoing • We will explain how your inputs influence our work and your experiences

2.2 Key feedback from Consultation with Relevant Stakeholders

During the development of the LMRP, Evoenergy consulted with key stakeholders to gather input on the rollout approach. The consultation helped identify important factors that could affect the meter replacement process and informed decisions on scheduling, coordination, and operational planning.

The following sections outline the key points raised during engagement and consultation during the development of the draft LMRP and the subsequent review of the draft LMRP by Affected Retailers and MCs, as well as other key stakeholders.

2.2.1 Initial Consultation

During the initial rounds of consultation, stakeholders provided feedback on alignment with other LNSPs, scheduling considerations, management of life support equipment registered customers, safety protocols, challenges to full meter replacement and other topics. Evoenergy considered this input in shaping the draft LMRP to ensure practical implementation and minimal disruption. The following section provides more detail on each topic raised.

Safety

During stakeholder consultations, MCs and Affected Retailers discussed the need for metering technicians to be able to pull fuses to ensure efficient legacy meter replacements. Evoenergy confirmed that metering technicians will be able to do this subject to appropriate authorisation, through the completion of training. This ensures only qualified technicians are permitted to carry out specific tasks, such as inserting or removing service fuses (where an appropriate protection device is in place) and terminating consumer mains cables at the network boundary. However, technicians will not be authorised to alter, remove, or relocate Evoenergy's network infrastructure, maintaining strict safety and operational standards.

Stakeholders acknowledged that this approach provides clear procedural guidance.

Alignment with other LNSPs

During consultation with stakeholders, Evoenergy found that its draft LMRP development approach, particularly suburb-based grouping, was largely consistent with those adopted by other LNSPs. Affected Retailers and MCs confirmed that the proposed strategy aligned with other distributors' LMRPs, ensuring consistency across the industry and minimising operational complexities.

This alignment offers several benefits, including reduced costs, streamlined planning, and improved workforce productivity. By maintaining a standardised approach, Affected Retailers and MCs can integrate the rollout into their existing processes more effectively, leading to greater efficiency and coordination across the sector.

Ongoing communication

MCs emphasised the importance of maintaining open and ongoing communication channels throughout the LMRP to ensure a smooth and coordinated rollout. Given that MCs are responsible for executing the meter replacements, they highlighted the need for clear and timely communication between all parties, including Evoenergy and Affected Retailers, to effectively manage logistics and address site-specific challenges.

Meters with a shared fuse arrangement

MCs and Affected Retailers discussed the best approach for managing meters connected to a shared fuse arrangement and whether these premises should be treated as a specific cohort within the LMRP.

A shared fuse arrangement refers to a connection setup where metering installations for multiple premises rely on a single fuse at the network connection point. This means that replacing or maintaining one meter may temporarily disrupt power to all premises sharing that fuse. Due to the potential impact on multiple customers, replacing meters in such arrangements requires careful planning and coordination.

In some jurisdictions, shared fuses are more common and may necessitate a dedicated replacement strategy. However, in the ACT, only 3 known shared fuse arrangements have been identified which makes shared fuse arrangements rare. Given their low prevalence, stakeholders determined that treating these premises as a distinct cohort within the LMRP was unnecessary. Instead, MCs and Affected Retailers agreed that these instances could be managed on a case-by-case basis when encountered in the field, ensuring minimal disruption while maintaining compliance with customer notification requirements.

Distribution of challenging meter exchanges

Several stakeholders expressed concerns about the distribution of meters that may present challenges during replacement, such as those with access restrictions (e.g. locked gates or secured complexes) or those requiring electrical upgrades before a new meter can be installed.

The potential impact of postponing these difficult exchanges until the final Interim Period was discussed. However, stakeholders agreed that distributing challenging meter replacements more evenly throughout the LMRP would be a more effective approach, preventing a concentration of complex cases toward the end of the rollout and allowing for better resource planning and risk management.

This discussion led to further conversations on how challenging meter exchanges could be identified before attending a premises, ensuring that MCs are adequately prepared, and that necessary upgrades or access arrangements can be addressed proactively.

Scheduling and timing considerations

Under the LMRP, LNSPs can specify an Interim Period within which a Legacy Meter must be replaced, but the plan does not allow for more detailed scheduling within that timeframe.

During consultations, Evoenergy sought clarification on how Affected Retailers and MCs intended to time individual meter replacements within each Interim Period. Some MCs were uncertain about their scheduling approach, while others indicated they would follow read sequences and the corresponding Next Scheduled Read Date (NSRD), aiming to replace meters within one to two weeks after the scheduled read date.

Discussions also highlighted the need for effective resource management throughout the rollout. Stakeholders recognised that a structured approach would be necessary to balance workforce availability, ensuring enough time for recruiting and training new technicians before full-scale replacements begin. Toward the later stages of the rollout, a gradual workforce ramp-down would be required as the volume of remaining replacements declines. Additionally, stakeholders discussed the need to allocate time for revisits, both for quality assurance purposes and as training opportunities for new staff. Revisits would also be necessary to reattempt Legacy Meter exchanges at sites where initial attempts were unsuccessful.

Customers registered for life support equipment

The management of life support equipment registered customers was a key discussion point during stakeholder consultations. Evoenergy sought input on how Affected Retailers planned to support these critical customers and what assistance might be required during the meter replacement process.

Stakeholders had varying perspectives on the best approach. The majority preferred to include life-support equipment registered customers in the standard rollout, integrating them into the suburb-based scheduling approach to ensure consistency. However, two Affected Retailers proposed an alternative strategy: replacing these customers' meters with smart meters before the first Interim Period. This approach would provide greater flexibility, allowing customers to select a replacement timeframe that best suited their needs, rather than being subject to the structured street-by-street rollout, which allows minimal scheduling adjustments.

Affected Retailers acknowledged that early smart meter deployment for life support equipment registered customers could introduce additional costs. However, some considered the customer experience and reputational benefits to outweigh these costs, as it would provide a more tailored and proactive approach. There was support for a targeted, self-managed early deployment option, with Evoenergy assisting retailers in facilitating these replacements where needed.

This led to conversations about whether there were other groups which should be treated as a separate cohort, such as vulnerable customers. It was determined that to ensure all customers gained timely access to the potential cost savings and efficiency benefits associated with smart meters the best approach was not to create separate cohorts, especially considering customer attributes often change over time.

Challenges to achieving one hundred per cent meter replacement

The smart meter rollout in other jurisdictions has shown the industry that, in practice, due to varying conditions as noted by each retailer, that whilst we must aim to achieve 100% of meter replacement, there will be impediments, for example:

- Customer refusal
- Installations requiring an upgrade prior to the fit-out of a new smart meter
- Asbestos or other hazardous materials used in switchboards, fuses and wiring
- A lack of space on some meter boards requiring complete replacement
- Meters situated inside houses, in backyards, behind fences and access to high security complexes.

Whilst the LMRP’s goal will be to exchange all metering, MCs noted they will likely encounter specific situations that may see residual sites exist post 2030 that will require further action to initiate the change to smart metering.

Each MC also confirmed that they would not replace any meter where the site was physically de-energised, as it was potentially unsafe to energise as part of their commissioning protocols. Affected Retailers also noted the same comment, and in one case, would not issue a work order for the meter replacement, until re-energised.

Evoenergy actively considered stakeholder concerns and feedback in the development of the LMRP, ensuring that key insights informed the rollout strategy. Table 2 summarises how this feedback was incorporated into the draft LMRP .

Table 2: Key Feedback and Concerns Identified During Consultation

Feedback or concern raised	How it was addressed
Support for a postcode or suburb-based approach	Evoenergy's LMRP is grouped by suburb. Some suburbs share postcodes so the use of suburbs allows for more specificity.
Ongoing communication and cooperation required	Evoenergy has committed to reoccurring meetings with stakeholders that have requested it. A new email address was created to provide continued assistance for LMRP related enquiries, smartmeterrollout@evoenergy.com.au
Distribution of site which may be more challenging to exchange the meter(s)	The SCR was developed to help determine a difficulty rating for each suburb based on eight metrics (more information can be found later in this document).
Time will be required to ramp up resources and iron out processes and installation setbacks	This Meter Replacement Strategy was developed to allow for resource acquisition and recruitment by MCs and the development of the processes at the beginning of the rollout. In particular, the first Interim Period is proposed to contain a lower number of meters to be replaced, (~15%), across suburbs with a lower complexity rating. To assist with planning, Evoenergy will provide read route and NSRD along with other information which must be provided to Affected Retailers and MCs (see Appendix A).
Resources may need to be wound down at the end of the program	This Meter Replacement Strategy was developed to also allow for resource reductions in the last Interim Period by containing a lower number of meters to be replaced in the last Interim Period.
Some sites may need to be revisited	Following on from the above, this Meter Replacement Strategy was developed to allow for revisits in the last Interim Period for sites with installation setbacks.

2.2.2 Subsequent Consultation

Prior to 28 February 2025, Affected Retailers and Metering Coordinators were provided with a copy of Evoenergy's draft LMRP and a list of Legacy Meters to be replaced in each Interim Period. The feedback received was positive, confirming the LMRP's alignment to their expectations, and its similarity to the LMRPs of other networks. While overall support was expressed, stakeholders also raised some topics for further consideration as attention shifts towards operationalising the plan. The following outlines the three key topics raised and how that feedback has been incorporated into Evoenergy's proposed LMRP.

Known shared fuse arrangements

Stakeholders requested more details about the premises with known shared fuse arrangements. In response to this, Evoenergy has identified three premises which have a known shared fuse arrangement requiring consideration across Interim Periods 1, 3, 4. These are located in the suburbs of Forde, Jerrabomberra and Yarralumla, each involving a single shared isolation point and two associated meters.

Due to the very low volume of affected premises, a modification to the LMRP was not deemed necessary. Evoenergy staff have visited these premises, confirmed the onsite configuration and captured photos for reference. These will be made available upon request by the relevant parties.

Affected Retailers with impacted premises were contacted directly via email on 9 April 2025, and a summary of the known shared fuse arrangements was added in Appendix C.

Management of meter replacement barriers

Stakeholders have noted that, without sufficient cooperation from Evoenergy, some Legacy Meters may not be able to be exchanged due to site-specific barriers. Evoenergy remains committed to working collaboratively with Affected Retailers and MCs to resolve these issues, where reasonable steps have already been taken by stakeholders. If assistance is required, we ask that an email is sent to smartmeterrollout@evoenergy.com.au.

Additionally, Evoenergy offers a broad range of ancillary control services that can be used to facilitate the remediation works required to enable the safe and timely replacement of Legacy Meters. Further details about these services are available on our website[1].

Additional data fields

Some stakeholders requested a range of additional data points for inclusion in the proposed LMRP, including, but not limited to, meter model, meter access information, controlled loads, street and unit number. Evoenergy reviewed the list of data points requested and found that the information is already available in the Market Settlement and Transfer Solutions (MSATS) or is not applicable to Evoenergy's distribution region. As MSATS provides a more accurate and dynamic source of information, duplicating these data points in the accompanying LMRP data extract was not considered beneficial.

Other queries received

In addition to the three key topics addressed in detail above, several stakeholders submitted requests for further information relating to Evoenergy's procedures, including clarifications on our Service and Installation Rules and Basic Design Application (BDA) fees. These matters fall outside the direct scope of the LMRP, as they concern established operational processes that apply across Evoenergy's distribution area.

We have responded to each query individually, providing the relevant supporting information or directing parties to existing resources, such as our website[1]. Where applicable, stakeholders were referred to sections of our Service and Installation Rules, which outline the technical and procedural requirements for working on or near our network.

The requests have been treated as operational in nature and, therefore, are not addressed within the proposed LMRP itself. Evoenergy remains committed to transparency and is available to engage with Affected Retailers and MCs on these or other operational matters through established communication channels.

[1] www.evoenergy.com.au

2.3 Ongoing Engagement

Evoenergy is committed to maintaining proactive and transparent engagement with affected stakeholders throughout the duration of the LMRP. This ongoing engagement will include:

- Scheduled and ad-hoc meetings with affected stakeholders to address issues as they arise.
- Annual workshops with Affected Retailers and MCs to discuss emerging themes and operational matters.
- A dedicated support and escalation channel via smartmeterrollout@evoenergy.com.au for premise level issues requiring direction attention.
- Regular updates to the ACT Government and ECRC, particularly where customer or safety related matters are involved.

This ongoing engagement approach reflects Evoenergy's broader Stakeholder Engagement Principles, which unpins our LMRP. By adopting adaptive and curious practices, Evoenergy will tailor engagement to the evolving needs of affected stakeholders, encouraging open dialogue and diverse perspectives, throughout the accelerated smart meter rollout.

3. Regulatory Alignment

This section explains how Evoenergy's LMRP applies the LMRP Objective and Principles in line with the NER while incorporating stakeholder feedback. By integrating this input, Evoenergy ensures that the Legacy Meter replacement process is efficient and responsive to key concerns.

3.1 LMRP Objective

The NER defines the LMRP Objective as *"the replacement of all Legacy Meters with type 4 metering installations in a timely, cost effective, fair, and safe way during the LMRP Interim Period."*[2]

To achieve this objective, Evoenergy has implemented a set of targeted strategies designed to balance safety, efficiency, cost and fairness throughout the rollout process. These strategies ensure that meter replacements are carried out in a structured and well-coordinated manner.

Table 3 outlines the strategies Evoenergy has applied to meet each aspect of the LMRP Objective.

Table 3: Application of LMRP Objective

Objective component	Application within our LMRP
Timely	The first four Interim Periods contain 90% of the total number of Legacy Meters to ensure that meter replacements are completed in an expedient manner.
Cost Effective	Key cost saving features of the approach include, suburb based scheduling using SCR to reduce technician travel time and balancing complexity across periods.
Fair	Stakeholder consultation was conducted to obtain diverse input, to allow specific needs and concerns to be addressed within our LMRP.
Safe	Evoenergy will continue to support third parties (metering technicians) to complete training to gain authorisation before completing work on or near our network. The authorisation permits tasks such as inserting or removing service fuses, where an appropriate protection device is in place, and terminating consumer mains cables at the network boundary but does not allow alterations to Evoenergy's network infrastructure. Authorisations last 12 months and can be renewed. Please refer to the Evoenergy website[1] for more information. Fatigue management was also considered by setting realistic Legacy Meter replacement targets for each Interim Period.

[2] AEMC, *NER*, Version 224, Section 11.177.1

3.2 LMRP Principles

The NER sets out four LMRP Principles that must be considered when developing an LMRP. These principles ensure a balanced and efficient approach to replacing Legacy Meters while addressing key logistical and stakeholder considerations. The principles state that:

- Each Interim Period must contain between 15-25% of the total number of Legacy Meters in the distribution area.
- Consider overall efficiency of the LMRP.
- Consider impacted stakeholders.
- Consider workforce planning and efficiency.[3]

To ensure adherence to these principles, Evoenergy developed the Suburb Complexity Rating (SCR), which assesses the estimated difficulty of exchanging Legacy Meters in each suburb. Additionally, a Meter Replacement Strategy was designed to provide a structured framework for allocating each suburb into an appropriate Interim Period within the plan.

Table 4 outlines how Evoenergy has applied these principles in developing the LMRP.

Table 4: Application of LMRP Principles

Principle	Application within Evoenergy's LMRP
15-25% of Legacy Meters per Interim Period	Applied by implementing the Meter Replacement Strategy
Overall efficiency	Applied by implementing the Meter Replacement Strategy and SCR metrics 2,3 and 4.
Consider impacted stakeholders	Applied by implementing then Meter Replacement Strategy and SCR metrics 5 and 8.
Efficient workforce planning	Applied by implementing the Meter Replacement Strategy and SCR metrics 1, 6 and 7.

More detailed information about the SCR and Meter Replacement Strategy can be found in Section 4.

[3] AEMC, *NER*, Version 224, Section 11.177.2 (c)

4. Legacy Meter Replacement Plan in Detail

4.1 Safety Commitment

At Evoenergy, the safety of the community and the people working on or near our network are our highest priority. The work which will be completed under the accelerated smart meter rollout is no exception. We require all technicians working on or near our network to complete specific training and hold appropriate authorisations to ensure safety compliance. This includes mandatory annual training on Evoenergy's Service and Installation Rules and Electrical Safety Rules, which must be completed via eLearning modules through the Beakon platform. Technicians must hold an unrestricted ACT electrical licence, be employed by an accredited company, and maintain current First Aid and CPR certification. Authorisations are valid for 12 months and are contingent on up-to-date training.

In the context of the LMRP, Evoenergy's training requirements are in addition to the requirements of the safe work systems of the companies engaged by Affected Retailers to perform Legacy Meter replacements. These will ensure that technicians performing Legacy Meter replacements on or near our network are trained and compliant with Evoenergy's standards. This reduces the risk of incident and/or injury and enhances the safety of both the technicians and the community. Maintaining high training standards also helps to safeguard network integrity during this large-scale meter change by supporting the consistent application of the Service and Installation Rules and the Electrical Safety Rules.

Due to the extended duration of the rollout, we acknowledge that training requirements and procedures may continue to evolve over time to reflect changes in standards, safety practices and regulatory obligations. Evoenergy remains committed to monitoring these developments and updating training content accordingly to ensure all technicians maintain the necessary competencies to safely perform meter replacements. Stakeholders are encouraged to refer to our website[4] for up-to-date information.

[4] www.evoenergy.com.au

4.2 LMRP Structure

To ensure a safe, efficient and structured rollout of Legacy Meter replacements, Evoenergy is proposing to adopt a suburb-based approach to allocate meter replacements over five Interim Periods. This allocation is based on two factors:

1. The **Suburb Complexity Rating**, which evaluates factors such as meter density and accessibility challenges and

2. The **Meter Replacement Strategy**, which considers balancing complexity and overall meter volumes.

The engagement and consultation outcomes outlined in Section 2 of this document were instrumental in shaping both the SCR and the Meter Replacement Strategy, ensuring that Evoenergy's LMRP is not only compliant, but simple, practical and efficient. The feedback and concerns raised by stakeholders is particularly reflected in the metrics which inform the SCR and the key elements of the Meter Replacement Strategy. These are described in the subsequent sections.

4.2.1 Suburb Complexity Rating

The SCR is a structured scoring system based on a combination of eight weighted metrics that assess a range of factors affecting meter replacement difficulty. The eight metrics are then weighted based on perceived impact to customers, MCs and Affected Retailers. It serves as a data-driven approach to ensure the LMRP objective and principles, as well as consultation feedback are applied in a logical, straight forward manner. The outcome of the SCR is that each suburb receives a suburb complexity score which helps to determine the Interim Period which that suburb is assigned to.

Table 5 provides a detailed summary of each SCR metric, including the weighting applied and an explanation of the metric's purpose. This breakdown helps illustrate how different factors contribute to the overall complexity score and how the scoring system supports a data-driven, fair, and efficient approach to planning meter replacements.

Table 5: Suburb Complexity Rating Summary

Metric description	Weighting	Explanation
Metric 1: Proximity	10%	The purpose of this metric is to identify meters that are likely to have longer travel times, making them less efficient to exchange. It has been calculated using straight-line distances, as various routes may be taken between locations. If the travel time is longer on average, then the SCR is higher. The starting point coordinates, specified in the Metrology Procedure Part B[5], correspond to a longitude and latitude point in Fyshwick. This location was chosen as a central reference when considering Canberra's urban population. It was deemed more relevant than the geographical centre of Canberra, the former Honeysuckle Creek Tracking Station site[6], or the Central Business District (CBD).
Metric 2: Lowest average number of meters per block and section	15%	This metric identifies areas with low-density meter distribution, such as isolated Legacy Meters, which are less efficient to replace due to extended travel times between jobs. Calculated using block, section, and suburb data, it highlights locations where scattered meters increase operational costs and scheduling complexities. It has been calculated using block, section and suburb information[7]. If the average meters per block is lower, then the SCR is higher.
Metric 3: Greatest average number of non-underground connections	10%	This metric aims to identify suburbs with a high concentration of overhead backyard connections, as these non-underground connections are more likely to present defects. A defect refers to a premises requiring remediation to meet current standards or address a safety issue. Necessary corrective work may involve a private electrician, Evoenergy, or both, depending on the nature of the defect. If the concentration of overhead connection is higher, then the SCR is higher.
Metric 4: Highest percentage of likely meter board non-compliance	20%	This metric aims to identify suburbs with a higher proportion of meter boards that are likely non-compliant with current standards and require upgrading. The requirement for meter boxes to be 600mm x 600mm was officially published in 1999[8], though anecdotally it was widely adopted in the ACT from approximately 1986. As a result, meter boards installed before 1986 are considered more likely to be non-compliant, potentially requiring upgrades to meet current safety and regulatory standards. If the most recent meter installation date was before 1986 then the SCR is higher.

[5] AEMO, *Metrology Procedure Part B*, Version 7.81, Section 13.2.4 (b)
[6] Geoscience Australia, *Centre of Australia States and Territories*, Retrieved from www.ga.gov.au/scientific-topics/national-location-information/dimensions/centre-of-australia-states-territories. Accessed on 29/01/2025
[7] ACT Government, *ACTmapi,* Retrieved from www.actmapi.act.gov.au. Accessed on 29/01/2025
[8] First formally appeared in AS 6002:1999

Metric description	Weighting	Explanation
Metric 5: Use of premises	10%	This metric aims to identify premises where disruptions are likely to have a significant impact on customers. Evoenergy utilises the Australian and New Zealand Standard Industrial Classification (ANZSIC) end-use codes to classify the purpose of each premises. Each ANZSIC code is assigned a value from 1 to 5 based on the potential impact of a disruption, with higher values indicating greater consequences (e.g., hospitals = 5, public toilets = 1), the higher the value, the higher the SCR. This classification helps prioritise and manage service continuity for critical locations.
Metric 6: Retailer diversity	10%	This metric aims to identify suburbs with the greatest diversity of electricity retailers, as a higher number of retailers can lead to increased coordination efforts during meter exchanges. Each retailer may use different MCs, and when multiple MCs are involved in a single area, the complexity of scheduling and resource management increases. This can lead to additional logistical challenges, requiring careful planning to ensure a smooth and efficient meter replacement while minimising disruptions for customers. If higher the number of different retailers, then the SCR is higher.
Metric 7: Highest percentage of likely hazards and/or access issues	15%	This metric aims to identify areas where meters are likely to have access issues or hazards, such as locked gates, animals, or other physical obstacles that could complicate meter exchanges. By highlighting these areas, it helps anticipate potential challenges and inform planning to minimise delays and safety risks during the exchange process. The greater the number of premises with an access issue or hazard, the higher the SCR. It is important to note that this assessment is based on information currently available to Evoenergy and may not account for recent changes in access conditions or newly arising hazards that were unknown at the time of this analysis.
Metric 8: Customer type classification	10%	This metric aims to identify the ratio of different customer types within each suburb, providing insights into the distribution of residential, commercial, industrial, and other customer categories. The classification is determined using the Customer Classification Code[9] provided by the current retailer, which helps differentiate between customer segments. Power outages during meter replacements may have varying consequences depending on customer type. For residential customers, disruptions are generally an inconvenience, though they may impact individuals with medical dependencies. In contrast, for business customers, particularly those in industries reliant on continuous operations (e.g., restaurants, manufacturing, healthcare facilities), even short outages can lead to financial losses, operational delays, or safety risks. The greater than number of business customers, the higher the SCR.

[9] AEMC, *NERR*, Version 42, Division 3, Rule 6

4.2.2 Meter Replacement Strategy

Evoenergy's Meter Replacement Strategy establishes a phased approach that uses the SCR to allocate each suburb to a specific period within the rollout. This strategy enables efficient resource use and a balanced rollout by distributing simpler and more complex areas within each Interim Period. Figure 3 provides a high-level description of the Meter Replacement Strategy. Key elements include:

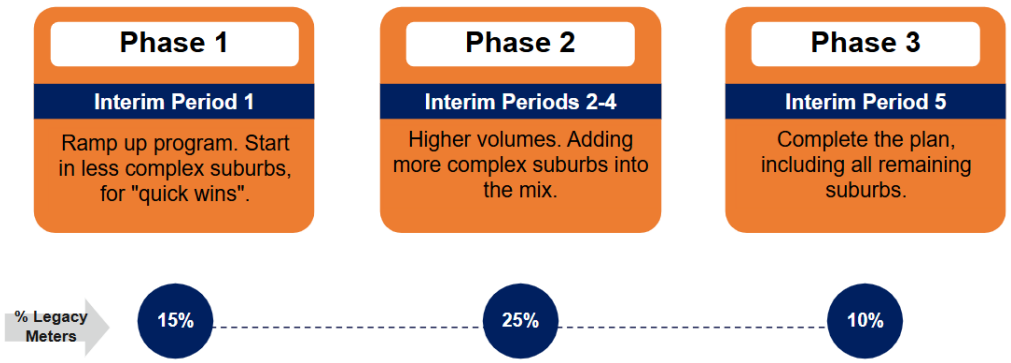
1. **Some "Quick Wins" First:** Interim Period 1 begins with lower complexity suburbs, such as those with newer infrastructure and high-density building complexes with a high volume of meters. This allows for a more efficient completion of meter exchanges. This approach allows MCs to establish momentum in the early phases and refine processes before moving into more complex areas. It also supports the NER's cost-effectiveness mandate by focusing on suburbs that require fewer resources initially.

2. **Balancing Complexity:** Interim Periods 2 to 4 contains a blend of high and low complexity suburbs, preventing resource strain and spreading out complex replacements. This balanced approach aligns with the NER's requirement for overall efficiency and equitable scheduling across the network. Interim Period 5 has an overall lower SCR as it is expected that some of the more challenging meter exchanges may carry over due to revisits.

3. **Ramp-Up and Ramp-Down Periods:** Evoenergy has targeted meter exchange volumes to allow the MC to ramp up its own resources in the first Interim Period to manage training and adjustment needs. Similarly, there is a planned ramp-down of volumes in the final Interim Period to enable MC to ramp down their own resources. This planning is to support the MC's workforce efficiency, aligning with comments received during consultation and to the NER principles for effective resource allocation and continuous progress.

4. **Equitable Customer Benefits:** Evoenergy has sought to include a geographically diverse approach to the assignment of suburbs across different Interim Periods. This ensures that customers across the entire Evoenergy network benefit from the transition more evenly, rather than prioritising certain geographic regions which may result in some geographic regions receiving no benefits until much later in the program. This promotes economic fairness, as customers across different geographic regions — regardless of their location — gain a level of timely access to the potential benefits associated with smart meters. If replacements were concentrated in specific geographic regions of the ACT first, then customers in other regions might feel unfairly treated as they continue incurring costs associated with outdated metering technology, such as missed opportunities for energy management. A more geographically uniformly distributed rollout helps prevent potential disparities in access to these financial and technological benefits, ensuring a fair and inclusive transition for customers.

Figure 3: High level Meter Replacement Strategy



4.3 Suburb allocation for each Interim Period

After calculating the SCR for each suburb, the Meter Replacement Strategy was then used to assign suburbs to an appropriate Interim Period based on their complexity scores along with achieving the goals of the Meter Replacement Strategy. This approach ensures a structured and efficient rollout, prioritising areas with greater challenges while maintaining alignment with operational and regulatory requirements.

Table 6 provides a summary of Evoenergy's suburb allocations, outlining the planned schedule for Legacy Meter replacements across different Interim Periods.

Table 6: Interim Period Summary

Interim Period	Average SCR	Total Meters	Total NMIs	% of Total Replacements
Period 1 (2025-2026)	2.21	20,880	19,903	15%
Period 2 (2026-2027)	2.94	33,955	31,299	25%
Period 3 (2027-2028)	2.88	33,921	30,948	25%
Period 4 (2028-2029)	2.93	33,408	30,375	25%
Period 5 (2029-2030)	2.59	13,577	12,714	10%

Table 7 presents an alphabetical breakdown of suburb allocations for each Interim Period. Figures 4 to 8 visually represent the LMRP, where darker areas on the heat map indicate a higher concentration of Legacy Meters scheduled for replacement within the Interim Period.

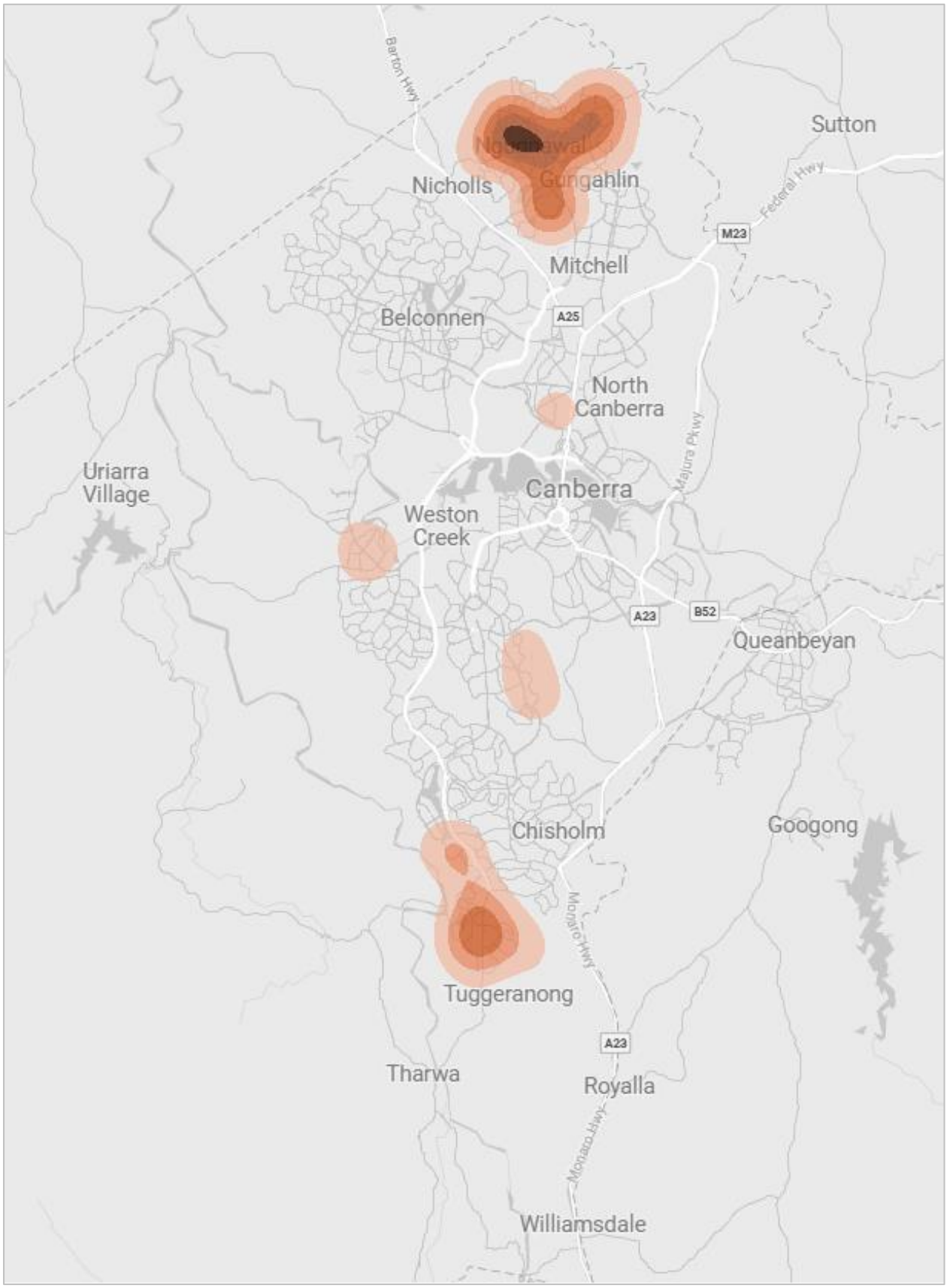
Table 7: Suburb Allocation

Interim Period	1	2	3	4	5
Suburbs	Amaroo	Banks	Ainslie	Booth	Uriarra Village
	Barton	Belconnen	Aranda	Campbell	Nicholls
	Bonner	Calwell	Beard	Canberra Airport	Franklin
	Bonython	Capital Hill	Braddon	Canberra Central	Harrison
	Casey	City	Bruce	Chifley	Theodore
	Conder	Cook	Chapman	Chisholm	Acton
	Coombs	Coree	Charnwood	Deakin	Farrer

Interim Period	1	2	3	4	5
Suburbs	Denman Prospect	Curtin	Cotter River	Downer	Hackett
	Forde	Dickson	Crace	Fadden	Kingston
	Gordon	Dunlop	Duffy	Flynn	Red Hill
	Isaacs	Evatt	Fisher	Fyshwick	
	Jacka	Florey	Forrest	Gowrie	
	Lawson	Gilmore	Fraser	Gungahlin	
	Ngunnawal	Giralang	Garran	Holt	
	O'Malley	Greenway	Hall	Hughes	
	Palmerston	Griffith	Jerrabomberra	Isabella Plains	
	Throsby	Hawker	Kambah	Kowen	
	Turner	Higgins	Lyneham	Latham	
	Wright	Holder	Macquarie	Macarthur	
		Hume	Mawson	Macgregor	
		Kaleen	McKellar	Macnamara	
		Lyons	Melba	Majura	
		Mitchell	Monash	Moncrieff	
		Molonglo Valley	Oaks Estate	Narrabundah	
		Oxley	Page	O'Connor	
		Pearce	Parkes	Paddys River	
		Pialligo	Phillip	Rendezvous Creek	
		Queanbeyan	Reid	Richardson	
		Scullin	Rivett	Royalla	
		Tennent	Stirling	Spence	
		Torrens	Sutton	Stromlo	
		Tralee	Tharwa	Symonston	
		Williamsdale	Woden Valley	The Angle	
				Tuggeranong	
				Wallaroo	
				Wanniassa	
				Waramanga	
				Watson	
				Weetangera	
				Weston	
				Weston Creek	
				Yarralumla	

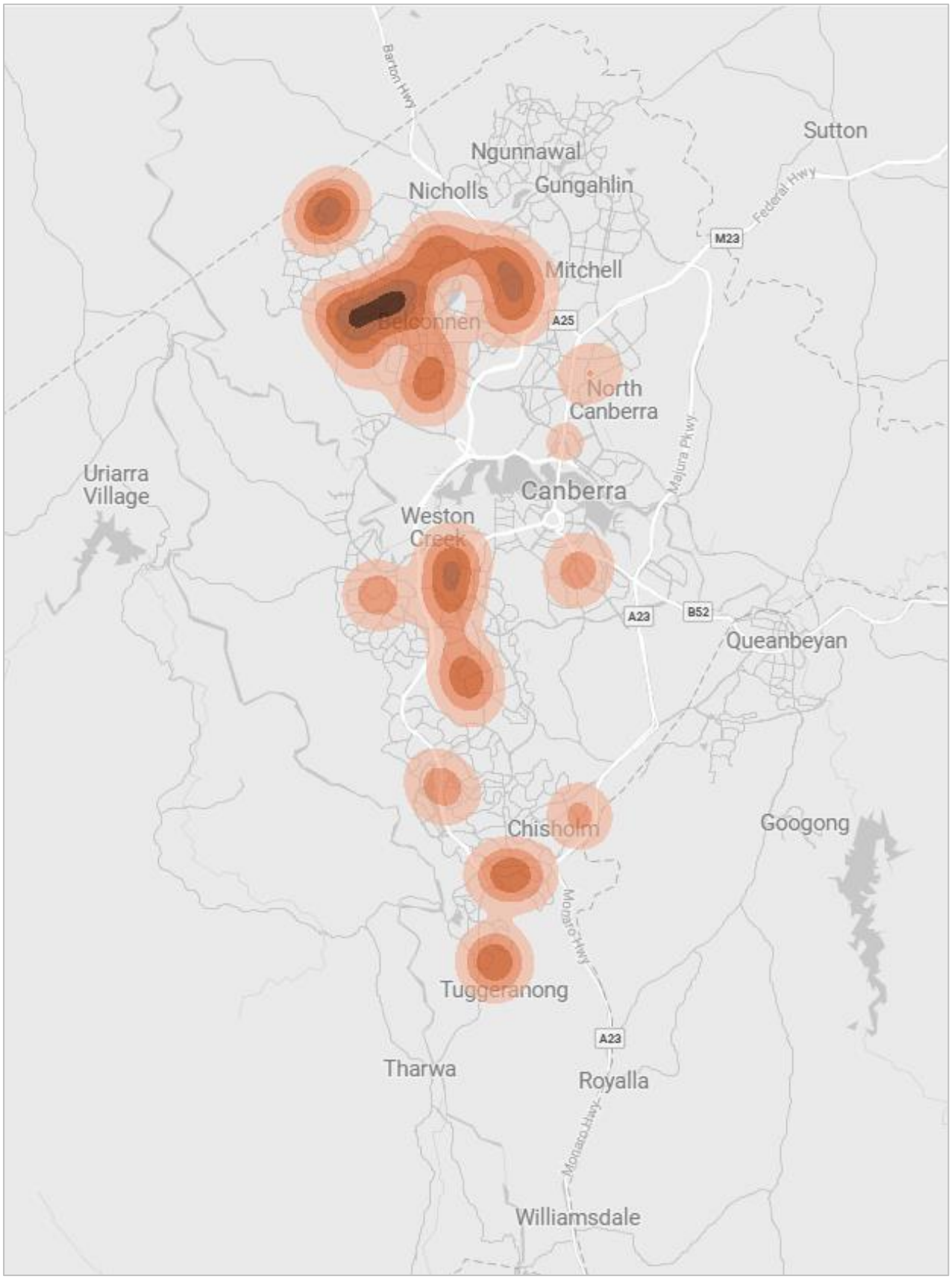
Interim Period 1

Figure 4: Interim Period 1



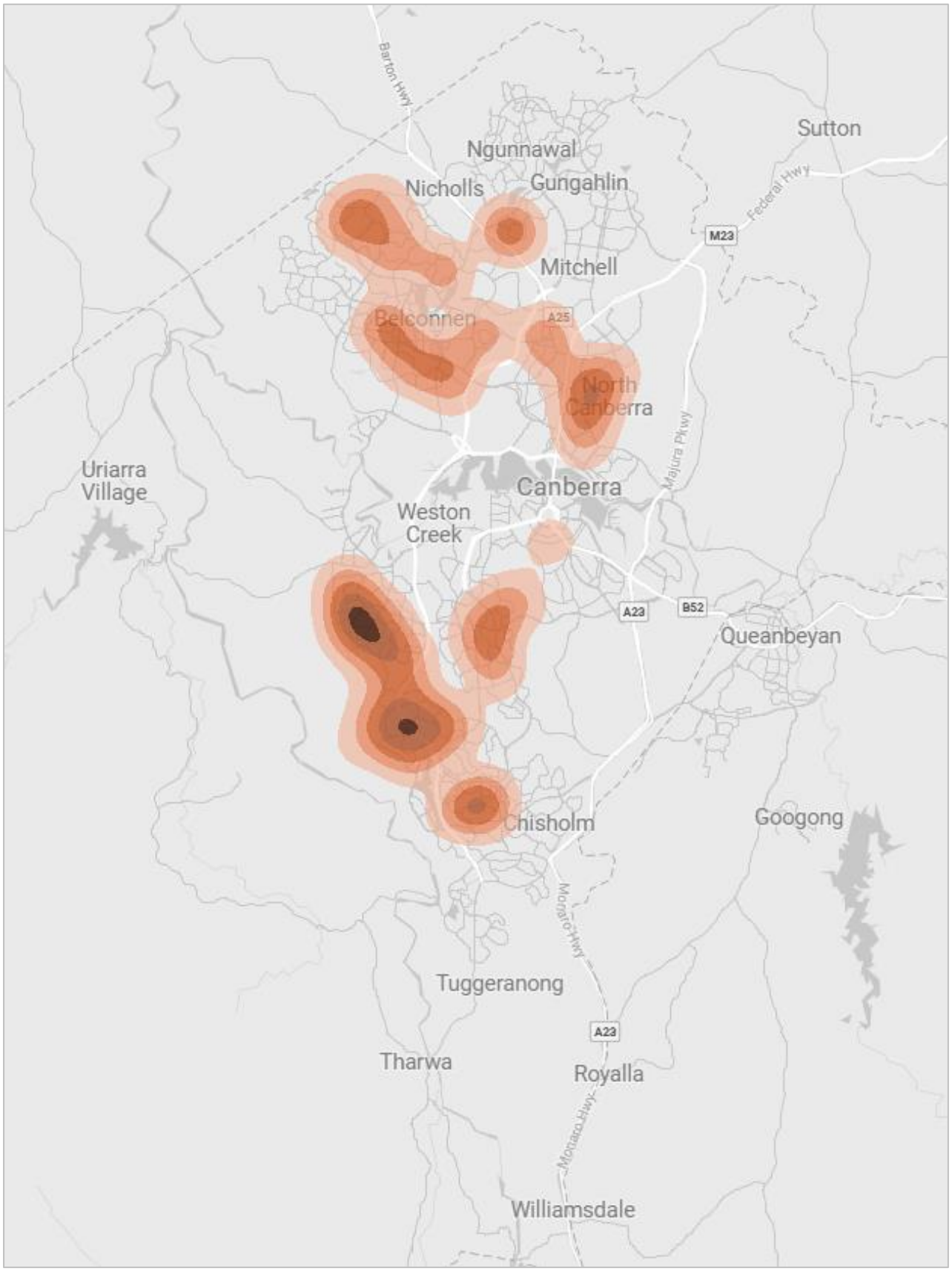
Interim Period 2

Figure 5: Interim Period 2



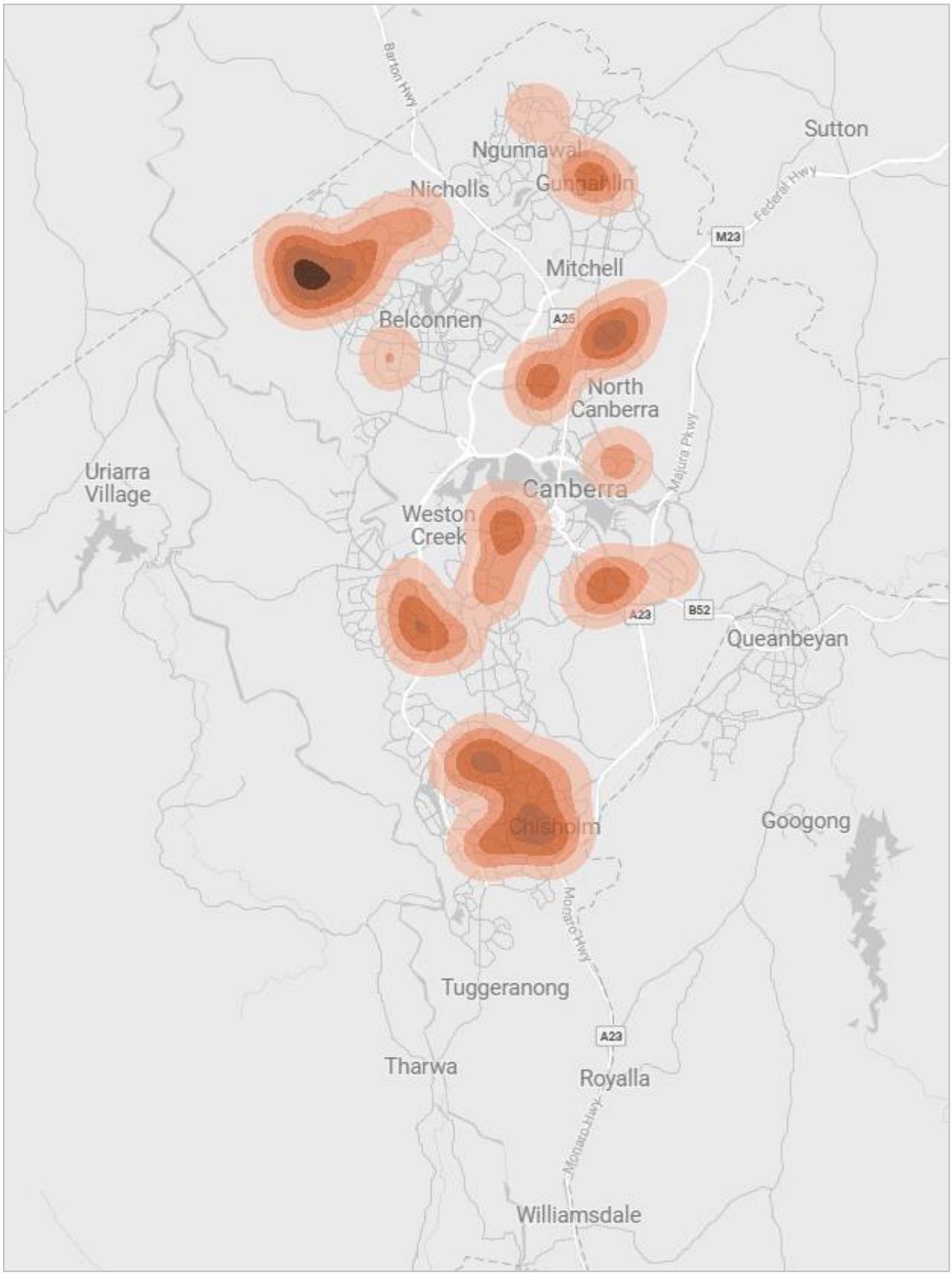
Interim Period 3

Figure 6: Interim Period 3



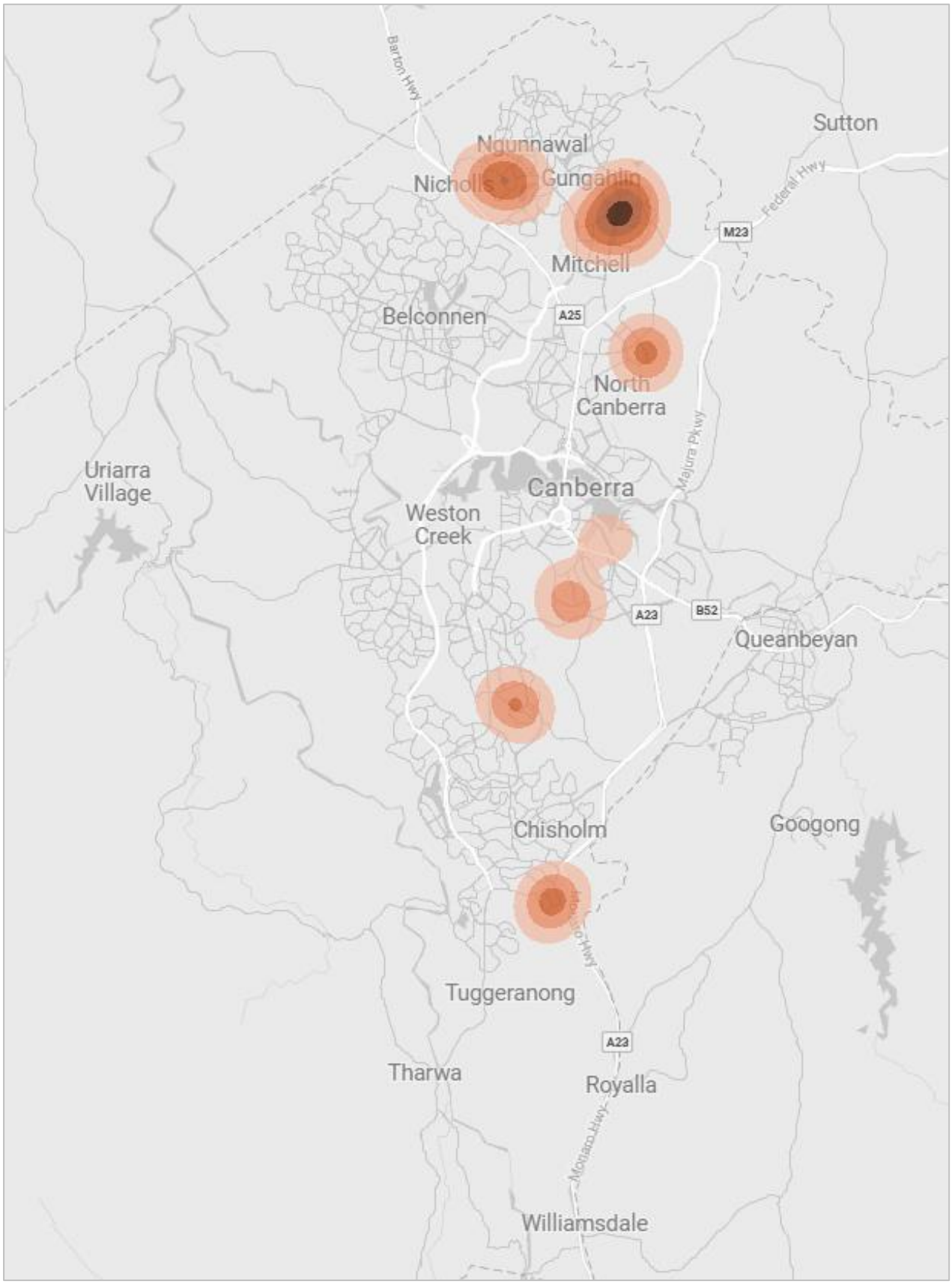
Interim Period 4

Figure 7: Interim Period 4



Interim Period 5

Figure 8: Interim Period 5



Appendices

Appendix A: Interim Period NMI schedule

NMI lists for each Interim Period, which will be provided in the below format to the relevant parties.

Interim Period	Retailer Name	Retailer	NMI	Meter Number	Meter Class	Suburb	Postcode	Reading Route ID	NSRD
#			7xxxxxx				2xxx		DD/MM/YYYY

The Interim Period NMI schedule has been redacted as it contains sensitive information.

Appendix B: Glossary

Term	Meaning
ACT	Australian Capital Territory
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
ANZSIC	Australian and New Zealand Standard Industrial Classification
CBD	Central Business District
LMRP	Legacy Meter Replacement Plan
LNSP	Local Network Service Provider
NER	National Electricity Rules
NERR	National Electricity Retail Rules
NMI	National Metering Identifier
NSRD	Next Scheduled Read Date
SCR	Suburb Complexity Rating

Appendix C: Summary of Known Shared Fuse Arrangements

Interim Period	Count of Shared Isolation Point	Count of NMIs	Count of Meters	Suburb	Postcode
1	1	2	2		
2	0	N/A	N/A		
3	1	2	2		
4	1	2	2		
5	0	N/A	N/A		

Please note: Affected Retailers were emailed about these premises on the 9 April 2025. Suburb and postcode information has been redacted as it contains sensitive information.

Appendix D: Response to AER's List of Considerations for Reviewing LMRPs

This appendix outlines how Evoenergy's LMRP addresses the list of considerations for reviewing LMRPs as provided in Attachment B of the AER's guidance letter dated 3 June 2025.

The AER's checklist reflects the requirements under clause 11.177 of the National Electricity Rules and serves as a key tool in assessing whether a LMRP is compliant with the LMRP Objective, Principles, and stakeholder engagement obligations. The table below maps each consideration to the corresponding section(s) of this LMRP where it is addressed.

#	Consideration	Relevant obligation	Main section(s) where it is addressed in Evoenergy's LMRP
1.	Does the LMRP cover all Legacy Meters at connection points other than embedded networks?	11.177.2(a)	Section 1.1 – Purpose Section 4.2 – LMRP Structure
2.	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?	11.177.2(a)	Section 3.1 – LMRP Objective Table 3: Application of LMRP Objective Section 4.1 – Safety Commitment
3.	Does the LMRP include a description of how it is compliant with the LMRP Objective?	11.177.2(b)(2)	Section 3.1 – LMRP Objective Table 3: Application of LMRP Objective
4.	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.	11.177.2(b)(1)(i)	Section 4.3 – Suburb Allocation for each Interim Period Table 6: Interim Period Summary Appendix A: Interim Period NMI schedule
5.	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.	11.177.2(b)(1)(ii)	Section 4.2 – LMRP Structure Table 7: Suburb Allocation

#	Consideration	Relevant obligation	Main section(s) where it is addressed in Evoenergy's LMRP
6.	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 between approximately 15–25 per cent of the total to be 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 in regional areas.	11.177.2(c)	a. Table 6: Interim Period Summary b. Table 3: Application of LMRP Objective Section 4.3.2 – Meter Replacement Strategy Table 5: Suburb Complexity Rating Summary (Metrics 2, 3, 4) c. Section 2.2 – Key Feedback from Consultation Table 2: Key Feedback and Concerns Identified d. Section 4.2.2 – Meter Replacement Strategy Table 5: Suburb Complexity Rating Summary (Metrics 1, 6, 7)
7.	Does the LMRP include a description of how the LNSP has had regard to the LMRP principles?	11.177.2(b)(2)	Section 3.2 – LMRP Principles Table 4: Application of LMRP Principles
8.	Does the LMRP include a description of: a. how 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.	11.177.2(b)(3)	Section 2.1 – Consultation with Relevant Stakeholders Section 2.2 – Key Feedback from Consultation with Relevant Stakeholders Table 2: Key Feedback and Concerns Identified During Consultation
9.	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 the submission of the draft LMRP to the AER?	11.177.3	Section 1.1 – Purpose Section 2.2.2 – Subsequent Consultation
10.	Was the LMRP submitted to the AER no later than 30 June 2025?	11.177.4(a)	Document dated June 2025 (cover page); aligns with submission deadline.