Legacy Meter Replacement Plan

Energex

27 June 2025

energex
Part of Energy Queensland

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Legacy Meter Replacement Plan

PURPOSE AND SCOPE

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

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

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

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Energex Limited ABN 40 078 849 055

Legacy Meter Replacement Plan

DEFINITIONS, ABBREVIATIONS AND ACRONYMS

Definitions

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

Affected Retailer	in relation to a LMRP, a retailer that is the FRMP for one or more connection points where a legacy meter is to be replaced under that LMRP
Energex	Energex Limited (ABN 40 078 849 055)
Final Rule	National Electricity Amendment (Accelerating smart meter deployment) Rule 2024 No. 20
Interim Periods	each of the following periods: • 1 December 2025 – 30 November 2026 (Period 1) • 1 December 2026 – 30 November 2027 (Period 2) • 1 December 2027– 30 November 2028 (Period 3) • 1 December 2028 – 30 November 2029 (Period 4) • 1 December 2029 – 30 November 2030 (Period 5)
legacy meter	any type 5 and 6 metering installation in operation, other than type 5 metering installations capable of remote acquisition
LMRP Period	1 December 2025 to 30 November 2030
LMRP Schedules	schedules to be supplied by Energex to each Affected Retailer showing the total numbers of legacy meters and associated NMIs by area to be replaced in each Interim Period for that Affected Retailer. Attachment 1 to this LMRP sets out the total numbers of legacy meters by area to be replaced in each Interim Period across all Affected Retailers and Attachment 2 to this LMRP sets out the total numbers of legacy meters by postcode to be replaced in each Interim Period across all Affected Retailers.

Abbreviations and acronyms

AEMC	Australian Energy Market Commission
CER	Consumer Energy Resources
FRMP	Financially Responsible Market Participant
LMRP	Legacy Meter Replacement Plan
LNSP	Local Network Service Provider

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MC	Metering Coordinator
MSATS	Market Settlement and Transfer Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERR	National Energy Retail Rules
NMI	National Metering Identifier
PoC	Power of Choice

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INTRODUCTION AND OVERVIEW

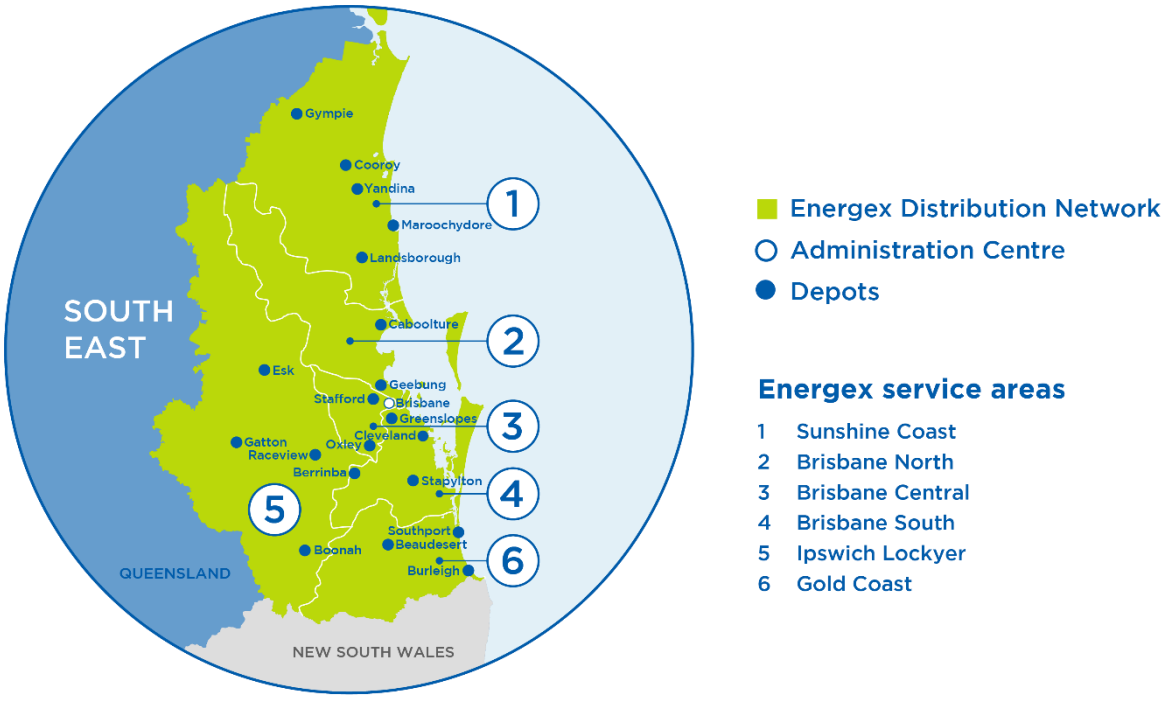
Who is Energex?

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

Energex's network area

Our distribution network runs from the New South Wales border in the south to Gympie in the north and west to the base of the Great Dividing Range. It includes the major population areas of Brisbane, the Gold and Sunshine Coasts, Ipswich, Redlands, Logan, and Moreton Bay. Figure 1 below shows our distribution area.

Figure 1: Energex's service area



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National Metering Reform

Power Of Choice Reforms

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

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

Accelerating Smart Meter Deployment

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

The implementation of the PoC reforms provided the metering framework and pathway for legacy meters to be replaced over time, with smart meters being installed on a new and replacement basis. While this framework has been in place since 1 December 2017, it has become clear (and widely agreed by industry) that a revised approach was required to accelerate the deployment of smart meters to better benefit customers and support the transition to the future energy system.

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

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

About this Legacy Meter Replacement Plan

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

Legacy Meter Replacement Plan

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

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

LMRP Objective and Principles

The objective and principles for LMRPs are:

LMRP Objective

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

LMRP Principles

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

- the number of legacy meters planned for replacement in each Interim Period should be between approximately 15–25 per cent of the total number of legacy meters required to be replaced under the LMRP;
- the overall efficiency of the LMRP, including costs and potential cost savings for affected Market Participants;
- the impact of the LMRP on Affected Retailers and other affected stakeholders; and
- appropriate and efficient workforce planning, including in regional areas.

Background

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

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

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

Legacy Meter Replacement Plan

Energex Meter Volumes

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

Energex	Smart Meters	Legacy Meters
Meter Volumes		**1,124,111**
NMI Volumes	**848,993**	**763,476**
Percentage	**52.65%**	**47.35%**

Table 1 – Energex Meter and NMI Volumes as of 19 May 2025

Market Participant Roles and Responsibilities

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

LNSP (Energex)

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

Affected Retailers

- Review proposed LMRPs from LNSPs and provide feedback and/or concerns for consideration

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

Metering Coordinators

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

DEVELOPMENT OF THE LMRP

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

Application of the LMRP Principles and LMRP Objective

Volumes of Legacy Meter Exchanges

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

The below percentages have been applied to each Affected Retailer's volume of customer installations with remaining legacy meters to ensure resourcing and delivery capacity for Affected Retailers and Metering Coordinators is fair, equitable and consistent across the Interim Periods. These percentages align with the LMRP Principle that the number of Legacy Meters planned for replacement in each Interim Period should be between approximately 15–25 per cent of the total number of Legacy Meters required to be replaced under the LMRP.

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

Table 3 – Interim Period Volume Percentages

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

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

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

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

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

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

Efficiency of the LMRP

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

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

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

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

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

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

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

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

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

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

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

- **Geographic allocation**

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

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

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

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

Energex area level and, in some instances of minimal volumes, all legacy meter replacements have been allocated to one Interim Period.

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

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

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

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

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

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

  - **Primary Priorities**

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

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

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

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

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

- **Secondary Priorities**

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

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

- **Shared Fuse Arrangements**

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

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

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

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

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

Table 4 – Shared Fuse Installation volume percentage

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

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

Energex's Safety Commitment

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

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

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

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

Energex Identified Constraints

Energex acknowledges that there will be challenges faced by metering parties which have the potential to impact delivery efficiencies and reaching the target of 100 per cent of legacy meters replaced within the LMRP Period. Based on information obtained from current targeted smart

meter deployments, and in line with the AEMC's final determination, Energex anticipates that between 10-15 per cent of legacy meters will remain in situ at the end of the LMRP Period.

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

Defects at Customer's Switchboards

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

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

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

One In All In – Shared Fuse Arrangements

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

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

Access to Customer's Installation

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

Resource Availability

Energex appreciates that accelerated smart meter deployment will see an increase in the current volumes of legacy meter replacements being completed within the industry. With this increase, it is anticipated that Metering Coordinators and Affected Retailers may need to engage additional resources to meet the required target, noting that technically trained personnel may take additional time to train and become accredited to perform the required work. We have also identified that the

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increase in temporary isolations to support the 'One-In-All-In' approach for Shared Fuse Arrangements will have an impact on Energex's resourcing requirements.

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

Data Quality

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

CONSULTATION AND ENGAGEMENT

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

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

Affected Retailer Engagement

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

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

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

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

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

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

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

- February 2025 – Energex contacted all Affected Retailers and provided an updated copy of the draft LMRP, formally inviting feedback in line with clause 11.117.3 of the NER. Energex provided an updated detailed draft schedule specifying NMIs with legacy meters to be replaced and the proposed corresponding Interim Period.

Metering Coordinator Engagement

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

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

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

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

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

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

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

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

Other Engagement Activities

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

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

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

Future Engagement Commitment

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

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

Feedback Received and Response to Feedback

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

Topic	Feedback	Response
Initial proposal for accelerated forward Interim Periods with the following percentages of NMI / Meters per period: Period 1 – 25% Period 2 – 25% Period 3 – 20% Period 4 – 15% Period 5 – 15%	It was noted that some of the Affected Retailers and Metering Coordinators who provided feedback on the proposed interim volumes were opposed to having the first period at the maximum of 25%. Various suggestions were provided ranging from 15-20% in the first Interim Period to allow for resourcing uplift within the industry. General support was provided for a lower volume of legacy meters scheduled for replacement in the final Interim Periods to allow for revisiting of complex or previously exempted legacy meter replacements.	Energex has adjusted its proposed plan to reduce the volume of legacy meters scheduled for replacement in the first Interim Period to 20%. The updated interim volumes in the draft LMRP are: Period 1 – 20% Period 2 – 25% Period 3 – 25% Period 4 – 15% Period 5 – 15%
Geographic grouping of legacy meter replacements within the same Interim Period utilising suburb, locality or town (as applicable for the area).	Feedback received indicated that, while geographic grouping was supported, a lower level of grouping would potentially provide a more efficient schedule that would assist in a cost reduction for Metering Coordinators and Affected Retailers. A suggestion to use meter reading round as opposed to suburb, locality or town was provided by some participants.	Energex agreed with the proposal to refine the grouping of legacy meters for replacement by utilising meter reading round information. It is recognised that the meter reading rounds would effectively provide a 'door to door' and 'street by street' scheduling opportunity for Affected Retailers and their associated Metering Coordinators. Energex has adjusted the methodology used to assign legacy meters for replacement so that all legacy meters for an individual Affected Retailer are bundled within the same Interim Period of the LMRP where Shared Fuse Arrangements are not identified as being present.
Geographic grouping of legacy meter replacements within the same Interim Period utilising suburb, locality or town (as applicable for the area).	Feedback received from Metering Coordinators that does not support grouping for an individual Affected Retailer. Suggestion made that grouping should be purely geographical and meter reading route based. The reasoning for this suggestion is that customers frequently change retailers and there is no guarantee that customers will not have churned	Energex acknowledged the feedback and understands that there are potential efficiencies for Metering Coordinators and their respective metering service providers if all legacy meter replacements within the same meter read round were to be bundled in the same Interim Period. While this feedback is noted, Energex has applied a distribution of legacy meter replacements across

Topic	Feedback	Response
	retailer by the commencement on 1 December 2025.	the Interim Periods considerate of each Affected Retailer to ensure that there are no large peaks or troughs of legacy meter replacement volumes in each Interim Period for Affected Retailers. Energex also notes that the volumes and individual sites allocated to each Interim Period are a minimum requirement, and that there are no rules that prohibit Affected Retailers from exchanging a legacy meter in an Interim Period earlier than prescribed in the LMRP Schedule.
Proposal to balance the deployment of Shared Fuse Arrangements in line with the proposed LMRP Interim Period percentages.	Mixed feedback was received with respect to balancing the deployment of Shared Fuse Arrangements in line with the proposed LMRP Interim Period percentages. Some participants suggested that a heavier forward weighted approach should be considered, whereas others had concerns with the broader planning and coordination required to facilitate the 'One In All In' process, and impacts a forward weighted schedule would have on field resources. Feedback was also received suggesting that attempts to bundle Shared Fuse Arrangements with other legacy meters replacements (via round) would drive efficiencies.	Energex has considered the feedback received and has adjusted the percentage volumes of Shared Fuse Arrangements for each Interim Period to the below, allowing for industry processes and coordination between relevant metering parties to mature and develop. Period 1 – 15% Period 2 – 20% Period 3 – 20% Period 4 – 25% Period 5 – 20% Scheduling of legacy meters for replacement in Shared Fuse Arrangements will be performed separately to other legacy meters, in the sense that whole installations will be identified and bundled utilising physical location information (street number, street name and suburb). This will ensure that all legacy meters within the same Shared Fuse Arrangement are scheduled for the same Interim Period, regardless of the Affected Retailer, which will provide clear visibility of future 'One In All In' schedules and allow for better resourcing forecasting for impacted metering parties, including LNSPs who will be required to facilitate the network outage.
Proposal to identify customer segments for earlier scheduling based on priority factors.	General support was provided for prioritising certain customer segments on the condition that it did not have a negative impact on delivery efficiency, and that all legacy	Energex appreciated the feedback regarding general support for priority groups and confirms that efficiency will not be impacted by the prioritisation of customer segments

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

Legacy Meter Replacement Plan

LMRP COMPLIANCE STATEMENT

Key considerations	Relevant NER obligation	Where this is addressed in the LMRP (Section/Page)
The LMRP covers all Legacy Meters at connection points other than embedded networks	11.177.2(a)	Pg 7 - Energex Meter Volumes, Table 1
The LMRP includes an outline of the replacement profile over the LMRP period, including: a) the total number of Legacy Meters to be replaced b) the corresponding NMI for each Legacy Meter c) the number to be replaced in each Interim Period	11.177.2(b)(1)(i)	Pg 7 - Energex Meter Volumes, Table Corresponding NMIs for each Legacy Meter is Private information and therefore will only be provided to each Affected Retailer and the AER in confidence. Pg 26 - Attachment 1, Legacy Meter Schedule by Area Pg 27 - Attachment 2, Legacy Meter NMI by Post Code
If the LMRP proposes to replace Legacy Meters in groups (e.g. by postcode or by geographical area), the LMRP outlines: a) the proposed grouping of Legacy Meters b) which groups are to be replaced in each Interim Period	11.177.2(b)(1)(ii)	Pg 10 - Efficiency of the LMRP Pg 26 - Attachment 1, Legacy Meter Schedule by Area Pg 27 - Attachment 2, Legacy Meter NMI by Post Code
The LMRP outlines the areas of high-priority (if any) and an explanation of why these areas have been chosen (e.g. aged meters, efficient to replace all meters in a geographically isolated area)	11.177.2(b)(1)	Pg 11 - Impacts on Affected Retailers and Stakeholders, and Appropriate and Efficient Workforce Planning – Identification and Application of Priority Customer Segments
The LMRP includes an explanation of how it is compliant with the LMRP Objective	11.177.2(b)(2)	Pg 9 – Application of the LMRP Principles and LMRP Objective

Legacy Meter Replacement Plan

The LMRP includes an explanation of how the LNSP has had regard to the LMRP principles	11.177.2(b)(2)	Pg 9 – Application of the LMRP Principles and LMRP Objective
The LMRP includes a description of: a) how the LNSP has engaged with relevant stakeholders, including: i. Affected Retailers ii. relevant Metering Coordinators iii. relevant local and state governments iv. distribution end users and groups representing them b) the relevant concerns identified in this consultation c) how these concerns have been addressed	11.177.2(b)(3)	Pg 9 – Application of the LMRP Principles and LMRP Objective Pg 18 – Affected Retailer Engagement Pg 19 – Metering Coordinator Engagement Pg 19 – Other Engagement Activities Pg 21 – Feedback Received and Response to Feedback
The LMRP includes strategies or plans for ongoing engagement with stakeholders during the LMRP Period	AER Guidance Note	Pg 20 – Future Engagement Commitment
The LMRP includes information and commitments to ensuring the safe installation of smart meters. This may include information about the ongoing consultation, strategies and relevant policies that ensure that smart meters are replaced in a safe way throughout the LMRP Period.	AER Guidance Note	Pg 15 – Energex's Safety Commitment
The LMRP demonstrates that the LNSP has: a) provided a draft LMRP to Affected Retailers b) provided a schedule specifying the Legacy Meters and corresponding NMIs to be replaced in each Interim Period to Affected Retailers and Metering Coordinators c) invited feedback on the draft LMRP by 28 February 2025 and ahead of the submission of the draft LMRP to the AER	11.177.3	Pg 18 – Affected Retailer Engagement Pg 19 – Metering Coordinator Engagement Pg 21 – Feedback Received and Response to Feedback

ATTACHMENT 1 – LMRP SCHEDULE BY AREA

The tables below provide the total numbers of legacy meters and affected NMIs by area to be replaced in each Interim Period. All Affected Retailers will be provided separately with a detailed schedule specifying the legacy meters and corresponding NMIs to be replaced in each Interim Period under the LMRP. [1]

Energex – Legacy Meter Schedule by Area

Location - Area	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Total Legacy Meters
BRISBANE CENTRAL	35,773	44,241	41,675	25,838	24,308	**171,835**
BRISBANE NORTH	40,927	51,748	50,923	31,990	30,250	**205,838**
BRISBANE SOUTH	58,106	73,655	74,349	45,933	45,200	**297,242**
GOLD COAST	41,812	52,400	51,296	32,281	30,460	**208,249**
IPSWICH LOCKYER	16,463	21,010	21,475	13,911	13,410	**86,269**
SUNSHINE COAST	31,032	38,533	37,790	23,607	23,716	**154,678**
Grand Total	**224,113**	**281,587**	**277,508**	**173,560**	**167,344**	**1,124,111**

Energex – Legacy NMI Schedule by Area

Location - Area	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Total Legacy NMIs
BRISBANE CENTRAL	23,657	29,666	29,764	18,769	18,176	**120,031**
BRISBANE NORTH	27,159	34,291	34,434	21,222	21,016	**138,121**
BRISBANE SOUTH	39,135	49,384	49,378	31,241	30,960	**200,096**
GOLD COAST	28,887	36,293	36,395	22,413	22,592	**146,575**
IPSWICH LOCKYER	11,405	14,369	14,496	9,231	9,022	**58,522**
SUNSHINE COAST	19,505	24,792	24,684	15,603	15,548	**100,131**
Grand Total	**149,748**	**188,795**	**189,151**	**118,479**	**117,314**	**763,476**

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

ATTACHMENT 2 – LMRP SCHEDULE BY POST CODE

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

Energex – Legacy Meter NMI by Post Code

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4000	897	1,057	1,807	729	1,959	6,449
4005	41	1,630	1,759	2,390	1,792	7,612
4006	467	989	1,864	1,586	1,176	6,082
4007	323	726	1,456	1,349	1,146	5,000
4008	57	13	22	14	57	163
4009	4	9	25	94	176	308
4010	25	312	503	131	542	1,513
4011	1,040	606	1,261	1,227	1,158	5,292
4012	873	2,282	1,654	842	929	6,580
4013	447	363	295	110	350	1,565
4014	573	591	501	301	311	2,277
4017	2,528	1,593	1,000	814	378	6,313
4018	316	901	803	173	236	2,429
4019	932	1,275	1,550	1,043	847	5,647
4020	922	1,753	1,478	974	1,425	6,552
4021	403	646	867	130	183	2,229
4022	143	181	549	191	148	1,212
4030	414	1,244	1,381	1,089	1,350	5,478
4031	587	466	1,455	828	614	3,950
4032	642	994	1,171	1,220	820	4,847
4034	2,065	3,034	2,424	1,214	1,170	9,907
4035	512	844	1,090	839	298	3,583
4036	445	291	109	49	39	933
4037	77	122	328	151	91	769

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

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4051	1,262	1,898	2,457	885	1,185	7,687
4053	2,614	3,015	2,256	1,233	1,200	10,318
4054	743	851	422	418	293	2,727
4055	775	860	701	265	362	2,963
4059	739	907	764	123	814	3,347
4060	1,178	637	583	382	236	3,016
4061	1,490	1,135	333	49	90	3,097
4064	862	1,284	1,506	358	282	4,292
4065	580	669	396	231	17	1,893
4066	1,614	1,556	1,336	972	781	6,259
4067	31	421	1,574	465	680	3,171
4068	1,057	1,189	2,022	2,119	1,016	7,403
4069	1,797	2,811	726	169	183	5,686
4070	1,237	371	207	12	7	1,834
4073	19	207	639	421	294	1,580
4074	404	1,262	1,489	653	632	4,440
4075	477	1,310	1,161	1,649	707	5,304
4076	33	325	430	232	383	1,403
4077	3,292	1,140	576	218	1,208	6,434
4078	876	1,419	1,169	339	162	3,965
4101	734	1,005	1,964	2,088	2,560	8,351
4102	85	696	571	1,101	391	2,844
4103	643	1,561	1,599	810	108	4,721
4104	297	272	661	52	728	2,010
4105	1,553	868	879	196	389	3,885
4106	38	141	113	25	206	523
4107	697	228	90	290	73	1,378
4108	608	442	406	171	388	2,015
4109	1,319	1,202	2,103	1,744	1,021	7,389
4110	749	747	490	235	304	2,525
4111	13	60	48	77	6	204
4112	208	415	309	173	14	1,119
4113	578	1,301	1,548	870	1,303	5,600
4114	1,699	2,002	1,339	699	1,390	7,129
4115	419	868	655	270	370	2,582
4116	308	794	572	1,198	871	3,743
4117	93	19	9	19	110	250
4118	118	2,464	1,600	500	381	5,063

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4119	182	377	549	324	259	1,691
4120	577	1,270	1,044	118	647	3,656
4121	1,785	1,565	1,388	374	348	5,460
4122	2,517	3,297	2,885	835	1,144	10,678
4123	938	828	747	357	532	3,402
4124	54	913	805	566	439	2,777
4125	1	246	392	250	191	1,080
4127	1,424	1,429	1,400	1,477	622	6,352
4128	426	644	1,040	570	255	2,935
4129	30	415	338	166	455	1,404
4130	5	373	524	218	211	1,331
4131	1,009	504	121	106	407	2,147
4132	3,382	386	54	207		4,029
4133	828	1,002	508	539	241	3,118
4151	1,177	1,357	885	1,404	1,193	6,016
4152	1,768	2,299	2,234	1,789	1,599	9,689
4153	331	59	218	153	27	788
4154	428	589	223	216	106	1,562
4155	4	39	21	57	129	250
4156	225	69	55	44	107	500
4157	301	612	1,451	953	782	4,099
4158		163	147	237	467	1,014
4159	350	780	873	420	303	2,726
4160	495	815	1,119	759	658	3,846
4161	168	1,139	929	388	334	2,958
4163	219	707	1,482	1,079	1,489	4,976
4164	423	1,068	536	435	214	2,676
4165	1,604	2,621	1,632	695	364	6,916
4169	73	796	1,471	1,304	1,656	5,300
4170	2,235	1,557	2,369	635	238	7,034
4171	918	2,379	1,066	288	44	4,695
4172	291	516	145	95	255	1,302
4173	522	548	517	272	100	1,959
4174	153	114	253	77	47	644
4178	889	1,492	1,872	944	1,654	6,851
4179	702	946	1,093	928	567	4,236
4183	139	406	226	169	507	1,447
4184	2,877	177	64	164	60	3,342

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4205	1	215	297	240	450	1,203
4207	2,837	2,335	3,102	1,621	2,068	11,963
4208	2	581	1,122	582	874	3,161
4209	1,306	1,818	3,064	1,824	1,715	9,727
4210	947	1,126	866	127	206	3,272
4211	3,880	4,080	2,309	1,790	487	12,546
4212	1,203	1,824	1,216	993	655	5,891
4213	1,328	941	1,209	871	502	4,851
4214	2,279	2,280	1,598	976	441	7,574
4215	1,781	5,072	5,119	3,890	3,285	19,147
4216	1,255	1,846	1,945	2,326	2,479	9,851
4217	2,767	1,427	3,755	2,562	4,202	14,713
4218	1,733	2,779	3,280	1,289	1,801	10,882
4220	1,744	2,090	2,343	1,611	2,568	10,356
4221	1,752	2,874	1,579	529	736	7,470
4223	1,007	907	1,075	355	532	3,876
4224	633	563	296	115	702	2,309
4225	633	379	1,546	1,002	486	4,046
4226	1,269	2,945	1,961	979	912	8,066
4227	1,192	1,362	1,450	782	421	5,207
4228	249	228	276	83	21	857
4270	23	23	397	153	95	691
4272	130	123	757	601	456	2,067
4275	57	41	319	237	145	799
4280	17	959	1,130	366	178	2,650
4285	1,694	1,622	740	458	621	5,135
4287	30	2	19	59	196	306
4300	2,171	1,080	2,099	1,769	1,846	8,965
4301	309	1,396	994	790	1,374	4,863
4303	231	438	136	73	18	896
4304	1,437	463	1,056	569	499	4,024
4305	2,572	5,278	3,879	1,926	1,248	14,903
4306	686	1,609	1,607	1,029	1,307	6,238
4307	31	78	173	97	80	459
4309	30	237	263	160	230	920
4310	625	426	364	222	153	1,790
4311	924	324	627	284	190	2,349
4312	8	344	298	139	133	922

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4313	119	162	224	242	157	904
4314	44	50	90	45	84	313
4340	135	74	503	407	287	1,406
4341	1,289	919	577	323	143	3,251
4342	164	89	193	90	148	684
4343	205	834	705	749	692	3,185
4344	30	87	248	111	170	646
4346	1	10	106	42	44	203
4347	80	21	58	95	115	369
4350		8			4	12
4352		442	265	70	83	860
4359			1		23	24
4500	2,366	1,636	1,525	721	1,385	7,633
4501	359	460	448	228	97	1,592
4502	264	590	327	217	51	1,449
4503	1,589	2,211	1,685	1,324	990	7,799
4504	396	457	535	430	407	2,225
4505	76	317	918	589	958	2,858
4506	849	849	997	440	399	3,534
4507	1,268	915	1,041	1,167	1,044	5,435
4508	694	1,184	935	332	276	3,421
4509	906	1,103	922	662	874	4,467
4510	1,971	2,872	2,206	1,290	802	9,141
4511	233	526	618	98	40	1,515
4512	86	198	59	90	73	506
4514	380	157	188	136	249	1,110
4515	36	154	174	177	398	939
4516	17	232	214	35	18	516
4517	4	24	12	31	62	133
4518	175	338	132	83	164	892
4519	432	408	268	272	314	1,694
4520	220	470	507	325	303	1,825
4521	255	87	214	162	127	845
4550	73	236	226	119	119	773
4551	3,058	3,586	3,865	2,420	2,300	15,229
4552	256	438	617	445	393	2,149
4553	376	201	142	143	94	956
4554	103	28	123	22	34	310

Legacy Meter Replacement Plan

Post Code	Interim Period 1	Interim Period 2	Interim Period 3	Interim Period 4	Interim Period 5	Grand Total
4555	572	327	206	69	56	1,230
4556	1,208	2,330	2,936	1,443	1,241	9,158
4557	1,328	1,654	1,153	959	427	5,521
4558	932	2,010	1,764	905	1,857	7,468
4559	166	285	370	83	53	957
4560	1,075	1,852	2,048	1,229	1,128	7,332
4561	253	304	280	241	261	1,339
4562	254	278	396	263	154	1,345
4563	291	529	523	173	237	1,753
4564	785	495	350	1,114	156	2,900
4565	1,421	1,063	515	304	91	3,394
4566	280	556	1,064	1,197	876	3,973
4567	735	1,364	1,340	595	1,203	5,237
4568	115	173	179	156	113	736
4569	92	66	80	32	57	327
4570	1,417	2,193	2,106	1,452	1,182	8,350
4571	20	41	24	32	86	203
4572	427	58	441	98	504	1,528
4573	1,911	1,877	1,497	726	1,081	7,092
4574	66	67	149	64	42	388
4575	901	1,553	1,479	794	855	5,582
4580	787	441	61		176	1,465
4581	3	17	325	128	251	724
Grand Total	**149,743**	**188,792**	**189,151**	**118,479**	**117,311**	**763,476**