

9 February 2026

The Victorian Metering Update Team
Department of Energy, Environment and Climate Action
Melbourne VIC 3000

By email: vic.meteringupdate@deeca.vic.gov.au

To whom it may concern,

Re: Updating Victoria's electricity metering framework

The Victorian Greenhouse Alliances (VGA) are pleased to provide this response on behalf of our members to the Department of Energy, Environment and Climate Action (DEECA) relating to the update of two legal Orders dealing with the installation of electricity meters.

The VGAs are encouraged that this electricity reform is being actioned in Victoria, and feel this has the potential to unlock benefits for local government and their communities, both through improved streetlighting technology and enabling secondary meters to encourage time of use charging which will better enable flexible load management, such as EV charging supporting the grid.

The Rule Change specifically affects local government through its management of public lighting. The Rule Change amends the National Electricity Rules (NER) to enable installation of Type 9 meters for street furniture connections such as street lighting, or EV chargers. This will enable councils to exert greater control and savings by seeing exact usage as opposed to estimated usage of these assets.

The VGAs recommend keeping costs as low as possible via a system that is simple and functional which avoids any layering of additional costs to smart lighting customers from metering. We note that the benefits from smart lighting are approximately \$30 per light for energy per annum, and \$300 per light for road safety savings. It is crucial that these community benefits are safeguarded and paying customers (local government) are not unnecessarily overburdened from the Rule Change.

The VGAs support the inclusion of a timeframe for distribution businesses to install meters at the primary connection point/s. We note that there will be extenuating circumstances where distribution businesses may not meet these timeframes such as following a natural disaster, and this should be taken into account.

Additionally, the VGAs support the move to enable WiFi functionality for meters as a choice for customers, given the diversity of connectivity quality throughout Victoria. WiFi has the potential to provide a trustworthy, low-cost benefit to Victorian residents and business by enabling easy oversight of their energy consumption. We urge DEECA to ensure access is optional, seamless, secure and a barrier-free process for residents, many of whom are not digitally-savvy. As ZigBee has proven, most will not use it if access proves challenging or security uncertain.

RECOMMENDATIONS:

The VGAs recommend that DEECA ensures:

- 1) That the costs of establishing DNSP Type 9 metering are kept as low as possible and not allocated solely to public lighting charges (eg: Operation, Maintenance and Replacement) and that they are also balanced across the statewide deployment of smart lighting on major roads.



- 2) That timely and up to date information is published as to Metering Coordinators / suppliers of Type 9 meters, to ensure customer confidence in the energy management of their public infrastructure.
- 3) That the Minimum Advanced Metering Infrastructure (AMI) Functionality Specification (Victoria) is amended for smart meters, to allow distribution businesses to install Wi-Fi enabled met
- 4) That customers are fully informed of WiFi benefits, ways to access it and the cybersecurity risks and measures in place for WiFi enabled meters, so as to make informed decisions in relation to using/not using the technology.
- 5) That customer access to Wifi enabled meters is optional.

Thank you for the opportunity to comment on the update of Victoria's electricity metering framework and the extension of time to provide you with our response. We would be happy to provide any further information or clarity and would welcome the opportunity to meet with DEECA's metering team to discuss this submission.



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This submission has been approved through the Greenhouse Alliances' governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.

