



**EnergyAustralia**

LIGHT THE WAY

2 May 2025

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Australian Energy Market Commission  
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Submitted electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Commissioners

### Accelerating smart meter deployment

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory, of which around 22k customers are supported under our hardship program (EnergyAssist). EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise 4,500MW of generation capacity.

EnergyAustralia appreciates the opportunity to participate in the consultation for the Minor Changes 1 2025; however, we oppose the expedited rule change in its current drafting, as the proposed changes are material and not 'minor' in our view.

EnergyAustralia raised our concern with the AEMC that the final rules of the Accelerating Smart Meter Deployment rule change did not update the Standard Terms and Conditions to remove the ability for customers to opt-out of a meter exchange, and we support the update to the Standard Terms and Conditions to reflect this.

We do not support the addition requiring retailers to issue a notice to customers following the alteration to the Standard Terms and Conditions. This has not been required for other Standard Terms and Conditions changes, and will be confusing and create dissatisfaction for customers.

We believe the AEMC should maintain the requirements and expectations of other changes to Market and Standard Terms and Conditions, as we do not believe this change justifies a bespoke arrangement. Our main concern is that this will be a confusing notification to customers:

- All Standard Terms and Conditions customers will receive this regardless if they have a basic or advanced meter;
- The timing in the notice is confusing, with customers being told it takes effect before the contract alterations actually take effect – Applying from 1 July 2025 with the alteration not coming into effect no later than 1 September 2025;

- The notice to customers of the changes in the Standard Terms and Conditions could create confusion when they are already receiving specific communication from retailers on the meter exchange process. We believe that a single source of information on the change will increase comprehension and acceptance and that it is preferable to have this be outlined via the meter exchange communication instead of a notice on the Terms and Condition's changes.

The timeframe proposed to implement this change is not reasonable considering the scale of change that is currently occurring.

**We will support an expedited rule change if the notification requirements are amended (align with other notification requirements for Terms and Condition changes) or removed entirely.**

If you would like to discuss this submission, please contact me on 03 9060 1361 or [Travis.Worsteling@energyaustralia.com.au](mailto:Travis.Worsteling@energyaustralia.com.au).

Regards

**Travis Worsteling**

Regulatory Affairs Lead