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Australian Energy Market Commission

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To Whom It May Concern,

Supporting compliance with meter maintenance obligations rule consultation paper

Stanwell Corporation Limited (Stanwell) appreciates the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) *Supporting compliance with meter maintenance obligations rule* (the Consultation Paper).

Stanwell is Queensland's leading provider of electricity and energy solutions to the National Electricity Market (NEM), and large energy users along the eastern seaboard of Australia. With over 40 years of continuous operations, Stanwell maintains a reliable supply of power from two of the most efficient and reliable coal-fired power stations in Australia - the Tarong power stations near Kingaroy and Stanwell Power Station near Rockhampton.

Stanwell's experience in working with communities to build, operate and maintain reliable energy generation assets is being applied to the shift to renewable energy, as we work on a pipeline of renewable energy and storage projects throughout Queensland.

This submission contains the views of Stanwell only and should not be construed as indicative or representative of the views or policy of the Queensland Government.

Stanwell's feedback

The Consultation Paper identifies issues with existing arrangements which are allegedly making it challenging for Metering Coordinator's (MCs) to meet their testing and inspection obligations for large customers in particular.

Most of the rule change requests for this consultation stem from MCs having obligations within the National Electricity Rules (NER) to ensure a retail customer's metering installation is compliant. Yet the NER does not provide any robust levers for MCs to make customers comply. The NER also contains several information gaps which makes it difficult for MCs to do their work efficiently without having to rely on the good will of third parties.

Stanwell agrees that it is not appropriate to penalise only one party within a process that requires two parties to cooperate, when the non-cooperative party bares no consequences. However, the proposed solutions which overwhelmingly seeks to effectively shift MC obligations and liabilities for metering compliance to retailers completely misses the mark.

As a retailer to commercial and industrial customers (i.e. large customers), Stanwell and our retail customers would be directly impacted by the proposed changes. Below, we have addressed the issues of most concern to Stanwell and our retail customers.

1. Retailer to de-energise a large customer's premise for non-compliant metering

The rule change request submitted by **Yurika** on **2 June 2025** proposes to introduce a process by which a retailer can de- energise a large customer's premises for non-compliant metering.

Stanwell understands from Yurika's rule change request that a metering installation, as defined in the NER, comprises not only the meter itself, but the assembly of components needed to measure, record, display and communicate energy data for a metering point.

Consequently, meter compliance testing often includes testing of either a current transformer (CT) or a voltage transformer (VT), which typically costs between \$15,000 to \$20,000 if testing is conducted during business hours, and much more if outside of business hours. Testing can also require electricity supply to be disconnected at the premise for up to 12 hours.

Stanwell does not support any proposal where retailers are required to de-energise a large customer's premises for non-compliant metering. The large customers which are the subject of this proposal by Yurika are typically operators of commercial and industrial premises where security of electricity supply is not only essential for business continuity but may be paramount for process safety. For some businesses, an electricity disconnection for the duration needed to conduct meter installation testing is an activity which requires board approval and work scheduling of 12 – 24 months to plan.

We understand and appreciate the challenges faced by MCs to achieve metering compliance at a customer's site. However, Stanwell believes that forced de-energisation, particularly of large customers, should not be a consideration for non-compliant metering.

The Consultation Paper puts forward several proposed solutions (discussed below), and Stanwell considers the combined implementation of these measures would be more practical and effective in incentivising large customers with non-compliant metering to agree to rectify the compliance issue.

2. Proposal to set terms and conditions of contracts with Metering Coordinators

The rule change request by **PLUS ES** on **15 July 2025** proposes changes to ensure that the terms of the appointment of the MC by a retailer or large customer include all metering installation testing and inspection obligations of the MC at a reasonable commercial rate.

Under the proposed changes, retailers would be required to pay MCs for testing and inspection activities as well as performing tasks that support MCs with their testing and inspection obligations, such as arranging retailer-planned interruptions.

Stanwell's experience is that the majority of our large customers have an established Direct Metering Arrangement (DMA) in place with an MC. As AEMO states in its rule change request, *"for connection points with these arrangements, the Financially Responsible Market Participant (FRMP) is not required to have a contractual relationship with the MC and may instead rely on the delivery specifications and related obligations on metering parties in the NER and AEMO procedures to access necessary data and services"*¹.

Stanwell manages obligations for meter testing and certification through our Retail Electricity Contracts, which specify customers' obligations to assist MCs, Metering Providers (MPs) and Meter Data Providers (MDPs) to perform this work, under the NER. This covers meter access, testing and compliance as well as recoverable costs.

While Stanwell agrees that an MC is entitled to charge a reasonable commercial rate for all metering installation and inspection obligations, Stanwell does not support codifying PLUS ES's proposal in the NER, terms and conditions of contracts with MCs are contractual matters and should remain as such. We consider this issue to be primarily a contract negotiation and contract implementation matter between the MC and retailer, or the MC and large customers.

¹ [AEMC Supporting Compliance with meter maintenance obligations, 4 December 2025](#) p.5

3. Improving the metering installation maintenance framework

The rule change request by **Intellihub** on **10 October 2025** seeks the following:

- a) *Requiring retailers to inform large customers that MCs are required to test and inspect metering installations.*

Stanwell supports this requirement and notes it is already implemented in our Retail Electricity Contracts which describe the responsibilities that the customer has with metering access and specifically maintenance and testing requirements under the NER and cooperation with Stanwell, the MC, the MP and the MDP to allow this to occur. We consider the provision of this information to be part and parcel of good customer service and to support other NEM participants in discharging their obligations. However, we do not consider it necessary to mandate that retailers must meet these requirements within the NER.

- b) *Requiring retailers to arrange supply interruptions to assist MCs in performing testing obligations.*

Although Stanwell does assist MCs in arranging and coordinating supply interruptions, we do not agree that it is appropriate for retailers to be given this obligation under the NER. Management and compliance of metering is not a retailer's core business nor area of expertise. Supply interruptions can be technically complex, and it is best for an MC (with technical knowledge of what needs to be done) to communicate directly with the customer.

From our own dealings with various MCs to support them in arranging supply interruptions, we found these to be at best complicated, and at worst uncoordinated. To overcome some of the barriers to compliance, we would encourage MCs to invest more time and resources in building internal capabilities such as having dedicated Account Managers to better facilitate communication and coordination of compliance testing with customers.

- c) *Requiring the previous MC to provide a copy of test certificates.*

Intellihub identifies that requesting High Voltage (HV) Voltage Transformer (VT) or HV Current Transformer (CT) test certificates can be an inefficient administrative process due to the reliance on the goodwill of individual people. This is because there is neither an obligation to share a copy of the test certificates nor any direct benefit for the previous MC.²

Intellihub “proposes a new obligation that applies to the previous MC to provide a copy of the HV VT or HV CT test certificate within 10 business days of the request from the current MC”. Stanwell supports this new obligation and agrees that this non-controversial proposal would make the MC's job more efficient.³

Stanwell suggests that these test certificates could also be made available and accessible through MSATs for prospective MCs. We note that AEMO are proposing a new field to introduce a “compliance status flag” which provides visibility to current and prospective FRMPs, MCs and MPs⁴. This transparency in metering compliance information may also address the issue of customers churning MCs to avoid metering compliance obligations.

4. Higher UFE for non-compliant metering installations

The rule change request by **AEMO** on **22 September 2025** proposes that the Unaccounted-for Energy (UFE) methodology be changed so that retailers (FRMPs) with non-compliant metering installations at their connection points would bear a proportionally greater share of UFE.

Stanwell welcomes AEMO's proposal to introduce a higher UFE allocation targeted at incentivising metering compliance. However, we do not think higher UFE allocation alone will drive metering compliance. Given the AEMO rule change request has been bundled with metering compliance obligations, Stanwell would like to also see a lower UFE allocation for customers with smart meters.

² [Intellihub Improving the Metering Installation Maintenance Framework, 10 October 2025](#) p.5

³ [Intellihub Improving the Metering Installation Maintenance Framework, 10 October 2025](#) p.9

⁴ [AEMO Strengthening Metering Compliance and Improving UFE Allocation Fairness, 22 September 2025](#) p.11

UFE needs to be more accurately and fairly distributed to customers based on their meter types and meter compliance. Customers that have invested in Smart-meter technology should be rewarded by having a UFE charge reflective of their contribution to the overall UFE in their distribution area.

5. Stanwell's suggestions to incentivise metering installation compliance

Establishing a Penalty Regime for metering non-compliance

Stanwell thinks that the solution for achieving meter installation compliance involves implementing the supported initiatives described above to give MCs the information and autonomy to perform their work. In relation to incentivising customers to comply with metering obligations, as stated above we do not think a higher UFE alone would be a sufficient disincentive to not comply.

As such, Stanwell suggests that the AEMC consider implementing an additional mechanism whereby fines could be introduced for recalcitrant sites. The fine should be introduced within the NER and apply to retail customers that refuse to cooperate with MCs to work towards achieving meter installation compliance. The fine could be tiered based on the scale of the load in question, nature of the non-compliance and duration of non-compliance.

This determination of non-compliance should involve input from the MCs, and potentially a mechanism which enables the MC to initiate the notification of non-compliance of a particular site to the AER. How and by whom this notification is initiated, the compliance process on the lead up to a fine and the scale of the fine itself would need to be carefully considered together with the mechanism for actual collection of the fine.

The fine penalises the party at fault but avoids the need for forced de-energisation and provides the customer with the choice to undertake their own cost benefit analysis of whether to comply or not, and by when.

Where there are genuine reasons for being unable to de-energise for an extended period, the compliance framework should provide the opportunity for the customer (in conjunction with their MC) to put forward an agreed plan with set timeframes so that there is assurance that the testing work will take place in accordance with the agreed plan.

Until a site achieves compliance, Stanwell would also support the introduction of a higher UFE for non-compliant sites, as proposed in the rule change request lodged by AEMO. The allocation of a higher UFE could apply to the customer until such time as metering compliance has been achieved, i.e. their metering compliance status is updated and the current "testing certificate" is uploaded and available in MSATs.

Introduce a "Metering Site Contact" to improve customer contact information

Yurika, in its rule change request, describes the process for an MC to locate a customer contact who has authority to request testing quotes or authorize plant shutdown from a retailer to be a time-consuming exercise. Yurika provided an example where it took them approximately 19 months to receive scoping documents from the customer ⁵.

With these timeframes in mind, Stanwell proposes the introduction of a "Metering Site Contact" or similar field which is available to MCs via a B2B service order request. This information would be required to be kept up to date by the retailer as the predominant customer contact and could provide email and phone contact at each customer's site.

Stanwell considers that streamlining and automating an MC's access to information and communication processes would address some of the issues identified in Yurika's rule change request.

⁵ [Yurika Amendments to the HV CT VT meter framework, 2 June 2025 p.7](#)

Conclusion

Stanwell appreciates the opportunity to provide feedback on the consultation *Supporting compliance with meter maintenance obligations rule Draft Rule Determination*. In summary:

Stanwell does not support any proposal whereby retailers should de-energise a large customer's premises for non-compliant metering, we believe this would be reckless and dangerous.

Alternatively, Stanwell strongly supports both AEMO's targeted UFE allocation methodology and the introduction of a financial penalty on recalcitrant customers within the NER, that could be based on the customers' load and nature and duration of non-compliance, these are practical, incentive-based solutions that promote metering compliance.

Stanwell does not support codifying PLUS ES's proposal in the NER, terms and conditions of contracts with MCs are contractual matters and should remain as such.

We believe the next stage of consultation should focus on practical process improvements rather than structural changes, including:

- the introduction of a "Metering Site Contact",
- implementing a "compliance status flag"
- mandating previous MCs to provide HV CT/VT "metering test certificates" which are available in MSATS, and
- MCs to build internal capabilities such as having dedicated account managers to better facilitate compliance testing
- introduction of a financial penalty on recalcitrant customers within the NER

Stanwell welcomes the opportunity to further discuss the matters outlined in this submission. Please contact Brad Supple via email at Bradley.supple@stanwell.com

Yours sincerely



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