AGL Energy Limited
T 02 9921 2999
agl.com.au
ABN: 74 115 061 375

Level 24, 200 George St
Sydney NSW 2000
Locked Bag 14120 MCMC
Melbourne VIC 8001

Attention: [redacted]

Australian Energy Market Commission

By Online Submission and Email: [redacted]

Reference Code: ERC0419

15 January 2026

Dear [redacted],

Supporting Compliance with Meter Maintenance Obligations – Consultation Paper

AGL Energy (AGL) welcomes the opportunity to provide feedback to the Australian Energy Market Commission (the AEMC) in response to the abovementioned Consultation Paper (the Consultation Paper).

Accurate and timely maintenance of metering installations is critical to ensuring reliable billing, market settlement, and system operation in the Australian energy market. However, current arrangements reveal significant challenges for metering coordinators (MCs), who are constrained by an inflexible regulatory framework and often lack the necessary support from large customers to fulfil their testing, inspection, and repair obligations under the National Electricity Rules (NER).

These challenges - including difficulties with site access, arranging supply interruptions, and recovering costs - have led to multiple rule change requests. These requests recognise that coordinated action, along with revised and pragmatic obligations, is essential to improve compliance, support MCs, and deliver better outcomes for consumers and the broader energy market.

AGL's high-level positions on the various proposals outlined in the Consultation Paper are:

1. We agree with the proponents that the **current regulatory frameworks** for meter testing and inspection, as well as exemptions for malfunction repairs, are **inflexible** and **unrealistic** to achieve in real-world settings. This creates unnecessary regulatory risk for MCs.
2. However, **none of the four rule change proposals** relating to the meter testing and inspection framework should be pursued exclusively, although some contain beneficial elements.
3. Furthermore, some proposed solutions do not address the root causes of the problem and instead **shift regulatory risk** to energy retailers or create even worse risks (such as de-energisation). These options should be strongly avoided.
4. Instead, the AEMC should consider a **more preferable rule change** that combines a hybrid solution incorporating the beneficial elements, while also considering other alternative solutions. AGL has outlined these options in Appendix C below.
5. The proposals relating to **exemptions for malfunction repairs** are largely acceptable and should proceed in their current form.

In support of the above positions, we attach for your consideration:

- ✓ Appendix A: Summary table of AGL's positions in response to the various proposed solutions
- ✓ Appendix B: AGL's responses to AEMC consultation questions
- ✓ Appendix C: AGL's recommended solutions

If you have any questions in relation to this submission, please contact Liam Jones on ljones3@agl.com.au.

Yours sincerely,

Liam Jones
Senior Manager Policy and Market Regulation

About AGL

Proudly Australian since 1837, AGL provides over 4.5 million gas, electricity, and telecommunications services to our residential, small, and large business, and wholesale customers across Australia. AGL operates the largest private electricity generation portfolio in Australia, with a total operated generation capacity of almost 8000 MW across Australia as of 30 June 2025. AGL owns Australia's largest privately-owned fleet of hydro assets and operates the largest portfolio of renewables and storage assets of any ASX listed company. Since 2006, AGL has invested billions of dollars in the construction and delivery of over 2 GW of renewable and firming capacity in the National Electricity Market (NEM).

Appendix A – Summary of AGL's Positions

Theme	Proponent	Element	AGL Position	Summary Feedback
Meter Testing & Inspection Framework	Yurika	De-energisation	Oppose	This is a disproportionate response. It is too risky from a commercial, safety and legal perspective. It would likely be difficult to disconnect these sites in any event, and we would not exercise the discretion if given it.
		Re-energisation	Oppose	As above.
		Best endeavours testing & inspection obligation for MCs	Support	It seems a sensible approach to move away from an absolute requirement to undertake testing.
	PLUS ES	Mandatory contractual terms to cover testing and inspection obligations at a reasonable commercial rate	Oppose	These don't need to be enshrined in the rules – MCs are able to negotiate these into their contractual arrangements in the ordinary course of business.
	Intellihub	Retailers to inform customers of testing obligations at least annually	Conditionally support	We would be supportive of retailers playing a role in communicating to customers subject to agreement on the type, frequency and content of the notifications.
		Safeguard mechanism	Oppose	As per de-energisation, with the added complexity and resourcing implications of managing the process over a 12-month period.
		Supply interruption	Oppose	As above and per de-energisations.
		Previous test certificates	Support	This is a sensible recommendation and would improve efficiencies. These should

				be shared MC to MC rather than via the retailer.
	AEMO	Definition of meter installation	Oppose	This merely (and unfairly) shifts the onus to maintain compliant testing and inspection standards onto the retailer – this will compound the problems that prompted this rule change request.
		Retailers to assist	Conditionally support	We would be supportive of retailers playing a role in communicating to customers subject to agreement on the type, frequency and content of the notifications.
		Apportionment of UFE	Oppose	UFE is to be shared proportionately across participants. It will be difficult for AEMO to measure or apportion the impacts of inspection and testing non-compliance – just because a customer is non-compliant doesn't mean their meter is not functioning properly.
		Advance notice of planned outages	Support	This is a sensible recommendation and would minimise any supply interruption impacts.
Exemption Framework for Malfunctions	Intellihub	More flexibility in the MC exemption application process	Support	We agree with the need for more discretion as to the scenarios that might qualify for an exemption.
		Retailers to assist in communicating and engaging with the customer	Conditionally support	We would be supportive of retailers playing a role in communicating to customers subject to agreement on the type, frequency and content of the notifications.

Appendix B – AGL's Responses to AEMC Consultation Questions

1. Do you agree with the issues that the rule change requests identify with current arrangements for testing and inspection?

AGL agrees that the current meter testing and inspection regime poses difficulties for MCs, large customers and retailers alike. As discussed further in our response to this question, we believe there are various reasons for these issues, many of which the proponents' solutions do not adequately address. Ultimately, the chosen solution must strike the right balance between recognising the impacts the current testing arrangements have on large customers and appropriately incentivising the relevant parties to comply with their metering and testing obligations.

a. Do you agree that MCs face challenges in meeting their testing and inspection requirements?

For example:

i. accessing customer sites

ii. arranging activities with retailers and large customers to complete testing and inspection activities

iii. recovering the costs of testing and inspection activities.

Yes - AGL agrees that the current testing and inspection regime is problematic and does not adequately apportion responsibility between the various parties. AGL believes there are five primary issues to consider in relation to metering and testing obligations:

- **Customer impacts:** It is important to first apply a customer lens and consider the nature of large market customers' business operations, metering installations (and any necessary access arrangements), and the significant impacts of supply interruptions (including de-energisations). While most large customers would consider supply interruptions critical, we draw particular attention to some of AGL's large customers who operate in important sectors such as mining, datacentres, telecommunications and manufacturing as being particularly vulnerable to outages. Changes to the metering and testing framework must consider how best to incentivise large customers to comply with their obligations - an inherent challenge is balancing these significant impacts against what large customers may perceive as administrative requirements.
- **Implications of metering and testing:** Flowing from the above, proper consideration is needed of the implications of non-compliance with metering and testing obligations. The Consultation Paper at section 2.1 states that testing and inspection are necessary to "support the accuracy and reliability of the data used to bill customers, settle markets and operate the system"[1]. However, the Consultation Paper does not quantify the prevalence, magnitude or impacts of these issues. These are important inputs when balancing trade-offs.

[1] Australian Energy Market Commission, *Supporting Compliance with Meter Maintenance Obligations: Consultation Paper*, AEMC, December 2025, p. 4.

- **Inflexible regulatory frameworks:** The current regulatory framework unfairly adopts an absolute, binary view of compliance that does not account for bespoke customer intricacies or the practical challenges of undertaking testing and inspection regimes. In doing so, it sets an impractical, unachievable standard - setting parties up for failure. AGL understands this is the primary motivator for these rule changes: to resolve a regulatory impasse between MCs and the Australian Energy Regulator. A flexible and pragmatic regulatory response is needed, especially when considering solutions that may involve shifting obligations between parties.
- **Large customer relationships:** When assigning responsibilities or obligations, it is important to have regard to the relationships parties ordinarily have with large customers. For example, a retailer's relationship with large customers will predominantly be from a billing perspective, whereas MCs or DNSPs may have a more technical and operational relationship. These on-site relationships should be leveraged to maximise the success of testing and inspection processes.
- **Industry relationships:** AGL understands that some retailers and MCs already have strong working relationships that enable many of the proposed approaches to be undertaken voluntarily through good practice (e.g. contractual provisions and information sharing). AGL encourages MCs and retailers to work together to identify and normalise best-practice procedures without the need to resort to regulatory intervention.

b. Do you agree that the current process for MCs to obtain test certificates is inefficient?

Yes - AGL agrees that the current process can be inefficient insofar as an incumbent MC may not always be able to readily ascertain the testing status of a given metering installation. This can require additional effort by MCs to identify the testing status or to undertake new testing that may not have been necessary. Notwithstanding the above, AGL is not aware of any instances of MCs refusing to share testing certificates or to cooperate with other MCs. The Consultation Paper does not identify any regulatory barriers to the voluntary sharing of testing certificates between MCs; accordingly, AGL questions whether an industry-led voluntary sharing agreement between MCs may be preferable to regulatory intervention.

2. Do you agree with Yurika's proposed solution?

AGL notes that Yurika's proposal comprises three elements: (1) de-energisation, (2) re-energisation and (3) best endeavours. AGL does not support the de-energisation and re-energisation elements, but supports the best endeavours element for the reasons set out below.

a. Should retailers be allowed to disconnect a large customer's premises if the MC communicates that a large customer has failed to ensure that its metering installation is kept in proper working order?

AGL does not support the use of de-energisations (and re-energisations as a necessary corollary) to manage instances where a large customer fails to meet its meter testing requirements. AGL's concerns are as follows:

- **Disproportionate response**: The use of de-energisations is a disproportionately punitive response, having regard to both the alleged contravention by the customer (which may be merely administrative) and the consequential impacts of disconnecting large-customer sites.

- **Absence of thresholds**: Under the current drafting, there is no proposed threshold for the conduct that would warrant de-energising a large customer's premises. This may result in de-energisation where there is no urgent safety or material need, or where there is no evidence of an issue or harm.
- **Commercial, safety and legal risk**: De-energisation of large-customer sites introduces significant commercial, safety (physical and infrastructure) and legal risks. Large customers often have complex operations; de-energisation can cause production loss, claims and churn. Ultimately, the retailer would unnecessarily bear front-line blame for de-energisations (whether justified or not), even where responsibility rests with the customer or the MC.
- **Discretion without obligation**: Under Yurika's current drafting, retailers would have a discretion to de-energise large-customer sites but would not be compelled to do so at an MC's request. For the reasons above, AGL would be unwilling and reluctant to invoke such a power. If retailers choose not to exercise the power, given the inherent risks and limited benefits, the root-cause problem will remain unaddressed.
- **Cost impacts**: The cost of de-energising a large-customer site can be significant (up to $6,000), reflecting the complex and bespoke nature of these installations. Large customers would need to bear these costs.
- **Low likelihood of success**: Even if de-energisations are pursued, AGL considers they are likely to have a low prospect of success due to factors such as access constraints, current transformers and sensitive load.
- **Minimum safeguards (if pursued)**: If this option is nevertheless pursued (which AGL does not support), both of the following safeguards would be required:
    - A de-energisation should occur only where the MC engages an independent technical assessor to certify a material non-compliance or an immediate safety risk.
    - Retailers should be legally indemnified when acting on certified instructions from an MC.

b. What are the benefits and risks the Commission should consider in assessing this solution?

AGL has outlined the risks associated with this change in response to 2(a) above. As noted in our introductory comments, there are positive elements to the Yurika rule change, particularly the 'best endeavours' standard. AGL agrees that the framing of the current testing and inspection requirements in the NER creates a strict, absolute standard for MCs. We consider this to be the primary driver for this (and other MC) rule change requests: to provide regulatory protection against an otherwise unachievable standard. For this reason, AGL supports altering the standard to 'best endeavours', noting the existing reliance on 'best endeavours' within energy regulation and the substantial body of jurisprudence defining what the standard entails. We agree with the Consultation Paper that this element of the Yurika proposal is capable of - and should be - decoupled from the de-energisation / re-energisation component and progressed independently.

3. Do you agree with PLUS ES' proposed solution?

No – AGL does not support PLUS ES' proposed solution for the reasons set out below.

a. Is it appropriate for the rules to prescribe that contracts between MCs and retailers or large customers include testing and inspection services?

The PLUS ES proposal seeks to improve compliance and enable cost recovery for meter maintenance by placing contractual obligations on retailers (or large customers) to support MC compliance.

There are two elements to consider: (1) model contract clauses covering testing and inspection obligations; and (2) clauses relating to cost recovery associated with meter-testing arrangements. AGL contends that neither element has sufficient basis to warrant regulatory intervention, for the following reasons:

Testing and Inspection Obligations

- Under the legal principle of 'freedom of contract', MCs, retailers and large customers can already negotiate and agree testing and inspection terms in the ordinary course of business. There is no evidence that this principle is failing within the metering sector.
- Contractual obligations requiring retailers to support MC compliance risk merely shifting the problems, regulatory burden and costs from MCs to retailers. For example, retailers do not always control site access - this could expose retailers to liability for factors outside their control and risk penalties under planned interruption/notice frameworks.
- It may be difficult to draft generic model terms that are applicable to all large customer scenarios. For example, a clause compelling a large customer to shut down operations and provide access to the MC may be impracticable for safety, security or operational reasons. These terms should remain bespoke, flexible and individually negotiated, having regard to each large customer's specific needs.
- Reliance on contractual obligations (rather than regulatory frameworks) raises questions about enforceability and may increase legal disputes between parties, at significant cost to all involved.
- Without appropriate transitional arrangements (which may be complex to draft and implement), there is a risk of requiring re-contracting between affected parties, involving significant administrative costs and increasing both uncertainty and risk.

Cost Recovery

- As above, the legal principle of 'freedom of contract' applies to cost recovery.
- There is no evidence of issues or harms relating to testing and inspection cost recovery within the metering sector.
- If a mandatory model-clause cost-recovery mechanism were pursued (which AGL does not support), it would need sufficient flexibility to permit subsequent cost pass-through and cost recovery between retailers and large customers.

- Under the National Electricity Law (NEL) and the National Energy Retail Law (NERL), the AEMC must ensure that the rules it makes contribute to the achievement of the national electricity objective (NEO) and the national energy retail objective (NERO). Both objectives begin with the common preamble: 'to promote efficient investment in, and efficient operation and use of, electricity services *for the long-term interests of consumers* of electricity (NEO) / energy (NERO)…' (emphasis added). A rule change that contemplates protecting the commercial interests of private organisations arguably does not relate to the long-term interests of consumers and is therefore neither appropriate nor within the AEMC's rule-making jurisdiction. The commercial interests of MCs should not require protection within energy frameworks.
- Mandating a 'reasonable commercial rate' may unintentionally standardise or inflate MC costs and reduce competition. Moreover, the concept is inherently contestable and would require supporting principles or guidelines to give parties certainty and to avoid disputes and delays.
- As above, issues relating to transitional arrangements are relevant - if not heightened - in respect of any mandatory contractual cost-recovery mechanism.
- The purported benefits in Table 2.3 of the Consultation Paper cannot be attributed to a mandatory contractual cost-recovery mechanism.

4. Do you agree with Intellihub's proposed solution?

AGL notes that Intellihub's proposal comprises four elements: (1) retailer communications; (2) a safeguard mechanism; (3) supply-interruption; and (4) access to previous test certificates. AGL conditionally supports assisting with customer communications and supports improved access to previous test certificates. However, AGL does not support the proposed safeguard mechanism or the supply-interruption element, for the reasons set out below.

a. Should retailers be required to inform large customers that MCs are required to test and inspect metering installations?

AGL recognises that, in certain circumstances, retailers can play a role in supporting awareness and customer communications regarding meter testing and inspection obligations for large customers. AGL conditionally supports this solution, subject to further consultation and agreement on the type, frequency and content of retailer notifications. Any retailer obligation should be limited to scenarios where the retailer manages the large customer relationship and should not apply where the large customer is represented by a broker or manager.

b. Should there be a safeguard for cases where a large customer does not fulfil their role in assisting MCs to perform testing obligations?

No - AGL does not support the proposed safeguard mechanism. We refer to, and repeat, the concerns outlined in our response to Question 2 above. In addition to inherent de-energisation risks, the proposed solution adds the complexity and risk of managing the de-energisation process over a 12-month period, increasing the likelihood of errors or wrongful disconnection.

c. Should retailers be required to arrange supply interruptions to assist MCs in performing testing obligations?

No - AGL does not support the use of unilateral supply interruptions for the reasons set out in relation to Question 2 and Question 4(b) above.

d. Should the previous MC be required to provide a copy of test certificates to the new MC?

Yes - AGL agrees that this is a sensible recommendation that would improve the efficiency of meter-testing processes, particularly by avoiding unnecessary testing. To support the efficient flow of information, AGL recommends that previous test certificates be shared directly between MCs rather than via the retailer. Certificates should be available to MCs 'on request', with reasonable response timeframes.

Additionally, AGL sees an opportunity to clarify the timeframe obligations on the new MC and the large customer where the previous test certificate is found to be 'expired' and retesting is required.

5. Do you agree with AEMO's proposed solution?

AGL notes that AEMO's proposal comprises four elements: (1) changes to the definition of a 'metering installation'; (2) a requirement for retailers to assist with customer communications; (3) apportionment of UFE; and (4) advance notice of planned outages. Similar to the Intellihub proposal, AGL conditionally supports assisting MCs and supports advance notice of planned outages. However, AGL does not support changes to the definition of a 'metering installation' or to the apportionment of UFE, for the reasons set out below.

a. Should the definition of 'metering installation' in the NER be changed to explicitly refer to a compliant and verified installation?

AGL does not support the proposed solution on the basis that it merely - and unfairly - shifts responsibility for maintaining compliant testing and inspection standards onto the retailer, which would compound the problems that prompted this rule change request. By inserting a requirement that a metering installation is one that is "compliant with testing and inspection requirements in the NER", there is a risk that any installation not compliant with these requirements would not be a 'metering installation' within the meaning of the NER, with flow-on implications for other obligations. Alternatively, it could create inconsistent or overlapping obligations between retailers and MCs, where both parties are responsible for testing and inspection outcomes. In either case, creating a new retailer obligation does not address the root-cause problem.

b. Should retailers be required to assist MCs in meeting their testing and inspection obligations within a specific time?

Consistent with AGL's response to Question 4(a) above, we recognise that retailers can, in certain circumstances, play a role in facilitating engagement between the MC and the customer. Any such assistance should be on a 'best endeavours' basis rather than an absolute obligation. We would welcome further consultation to clarify the type of assistance contemplated by this proposal, noting that we would conditionally support assistance limited to customer notifications, subject to agreement on the type, frequency and content of retailer notifications.

c. Should the UFE methodology be changed so that retailers with non-compliant metering installations at their connection points would bear a proportionally greater share of UFE? Are there any unintended consequences in changing the allocation of UFE?

No - AGL strongly disagrees with the proposal to alter the Unaccounted for Energy (UFE) methodology from a proportional allocation to one that punitively penalises retailers whose customers fail to comply with testing and inspection requirements. In support of this position, AGL notes:

- **Global Settlement principle**: Under the Global Settlement rule and methodology, the intent is to "treat all retailers equally"[2] by settling the market using the same process for all retailers. The proposed approach deviates from that principle by establishing different methodologies based on a retailer's customers and their behaviour.
- **Punitive and misdirected**: The approach is a punitive measure against the retailer which, as outlined previously, may - similar to the MC - have little control or ability to influence meter testing outcomes. It unfairly shifts the onus onto the retailer and imposes a disproportionate financial penalty.
- **Nature and causes of UFE**: UFE is the difference between the total electricity supplied to a distribution area and the recorded consumption by customers. The variance can be attributed to multiple factors - technical losses, unmetered / unauthorised consumption, data and settlement process errors, market and operational factors, and metering issues. This raises two issues:
    - Non-compliance with testing and inspection does not imply a meter malfunction or contribution to UFE. If a retailer were penalised through UFE allocation due to missed testing, but the meter were later tested and found to be operating correctly, would the UFE allocation be reversed? This would introduce further complexity into settlements.
    - Given the disparate root causes of UFE, it is neither possible nor appropriate to assume that a retailer's large customers failing to undertake testing and inspection is the cause of UFE and then apportion costs accordingly. How could such proportionality be reasonably measured or quantified?

d. Should LNSPs be required to provide advance notice of planned outages to assist MCs in planning testing and inspection activities?

Yes - AGL agrees that this is a sensible proposal and is supportive. It will minimise the need for supply interruptions and their impacts on large customers. AGL recommends that advance notice be issued to affected parties in a format conducive to system ingestion - rather than requiring parties to search for the information - so it can be automatically consumed by internal systems (e.g. machine-readable feeds and push-delivered notices).

[2] Australian Energy Market Commission, *Global Settlement and Market Reconciliation*, AEMC, accessed 14 January 2026, https://www.aemc.gov.au/rule-changes/global-settlement-and-market-reconciliation.

6. **Do you agree that there are scenarios where MCs may not be able to repair malfunctions within the collective timeframes specified in the NER and the exemption periods?**

Yes – AGL agrees that there are scenarios in which MCs may reasonably be unable to repair malfunctions within the timeframes set out in the NER and any applicable exemption periods.

a. Do you agree that there are scenarios where MCs cannot repair malfunctions that are:

i. individual failures within 30 business days?

Yes - AGL agrees that there may be valid scenarios affecting the repair timeframes for individual failures, including those contemplated in the Consultation Paper - such as defect rectification and meter access.

ii. family failures within 140 business days?

Yes – AGL agrees that there may be valid scenarios impacting family failure repair timeframes such as those contemplated in the Consultation Paper.

7. **Do you agree with Intellihub's proposal for the NER to specify what AEMO must consider in the Exemptions procedure?**

Yes - AGL is largely supportive of the proposed changes to the Exemption Framework for Malfunctions for the reasons set out below.

a. Should the NER define scenarios, guidance, or principles that AEMO must consider when considering an MCs' application for an exemption? If so, what?

Yes – AGL would be supportive of improved definitions and/or clearer guidance for MCs regarding exemptions for malfunction rectification. We agree that the current definitions are too narrow and do not adequately capture the full range of scenarios that may give rise to an exemption application.

b. Should MCs be able to apply for an extension to the exemption period in other circumstance where an instrument transformer is not required to be replaced?

Yes – AGL is supportive of adopting a more pragmatic approach to the extension application process that considers a broader range of scenarios and allows for increased discretion.

8. **Assessment framework**

a. Do you agree with the proposed assessment criteria?

AGL's feedback in response to each of the proposed assessment criterion is as follows:

<u>Outcomes for Consumers</u>

- AGL strongly agrees that the assessment should ascertain whether the rule changes provide sufficient and proportionate incentives for large customers to comply with relevant obligations.
- The assessment should also consider the impacts on large customers of undertaking supply interruptions for meter testing and inspection; these should be balanced against the consequences of non-compliance.

Safety, Security & Reliability

- AGL agrees with this criterion.
- The assessment should also consider the safety, security and reliability impacts of the proposed solutions, including de-energisations and supply interruptions.

Principles of Market Efficiency

- AGL agrees with this criterion.
- In particular, AGL strongly agrees on the need to correctly allocate risk and responsibility between parties to avoid merely shifting risk without addressing root-cause issues.

Implementation Considerations

- AGL agrees with this criterion.
- Additionally, the assessment should consider transitional arrangements, especially where changes to contractual arrangements between parties are required.

b. Are there additional criteria that the Commission should consider or criteria included here that are not relevant?

No - AGL does not recommend any further criteria beyond those proposed in response to Question 8(a) above.

Appendix C – AGL's Proposed Solutions

Must-Do Solutions (there is a clear case for these to be progressed)

a. MCs should perform meter testing and inspection obligations on a '**best endeavours**' basis.

b. Retailers should provide **reasonable support** to MCs to communicate meter testing, inspection and malfunction rectification obligations to large customers.

c. Historical meter **testing certificates** should be shared between MCs on request and within reasonable time frames.

d. DNSPs should provide **advance notice** of planned outages to MCs and retailers to enable a coordinated approach to meter testing and minimise the impact of supply interruptions.

e. There should be greater flexibility and discretion in the qualifying scenarios and application process for **exemptions for malfunction rectification**.

Might-Do Solutions (warrants further consultation and consideration)

f. Consider the development or utilisation of **alternative meter testing arrangements** that can be undertaken remotely and/or without supply interruptions.

g. Require MCs to provide meter testing and inspection **performance reports** to the AER, and require the AER to publish market reports on meter testing and inspection outcomes.

h. Introduce **customer-facing obligations** requiring large customers to comply with meter testing and inspection requirements, with graduated consequences for non-compliance.

i. Consider the introduction of **civil penalty provisions** against large market customers for failure to comply with meter testing and inspection obligations.

j. Introduce **de-energisation** processes (as a measure of last resort) that MCs can initiate and an independent third party or technical assessor can approve.

k. Prepare **better-practice guidance** for MCs and retailers, including sample model terms, indicative benchmark rates for testing and inspection, and customer communications.

l. Introduce a **central registry** of meter testing certificates, with a requirement for MCs to upload certificates.

m. Avoid changes to the NER in favour of pursuing **procedural or Code outcomes** through the AER and AEMO.