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Australian Energy Market Commission  
Via online Portal  
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## **Ausgrid response to Supporting compliance with meter maintenance obligations consultation**

Ausgrid is pleased to provide this submission to the Australian Energy Market Commission (**AEMC**) in response to its Supporting compliance with meter maintenance obligations (ERC0419) consultation on four related metering rule change requests. Ausgrid operates a shared electricity network that powers the homes and businesses of more than 4 million Australians living and working in an area that covers over 22,000 square kilometres from the Sydney CBD to the Upper Hunter.

Ausgrid recognises the need to enable Metering Coordinators (**MCs**) to comply with testing and inspection requirements under the National Electricity Rules. Ausgrid is not directly affected by, and does not have a view on, the solutions put forward in the rule change requests from Yurika, Plus ES and Intellihub. However, we do have significant concerns about the safety and administrative impacts of one aspect of the solution recommended in the Australian Energy Market Operator's (**AEMO's**) rule change request. This submission outlines these concerns. In particular, we encourage Commission staff to engage further with Ausgrid and other Distribution Network Service Providers (**DNSPs**) to fully understand the safety implications of what has been proposed by AEMO.

AEMO proposes to require DNSPs to provide retailers and MCs with advance notice of planned outages “– in addition to existing notice requirements in both the National Energy Retail Rules and Chapter 5 of the NER.”. AEMO notes in its rule change request that this “would allow compliance work to be scheduled during those shutdowns wherever practical” by MCs or customers.<sup>1</sup> We have two major concerns about this element of their rule change proposal:

1. **Safety:** Ausgrid has serious concerns that encouraging third parties to carry out maintenance work on temporarily de-energised systems could result in significant safety risks as electrical safety policies do not apply to unknown third parties who conduct work without approval from the network. DNSPs cannot be put in a position where they are making decisions about re-energising connections without knowing whether other parties may be carrying out their own maintenance activities, and what their current stage of work is being enacted, following notification of an outage. Networks may re-energise at any time or even cancel a de-energisation, putting third parties at a significant safety risk. Making sure DNSPs are fully notified about who else may be carrying out maintenance, and when, during planned outages would need significant management that is not recognised in the proposal. Measures to allow DNSPs to coordinate third party activities would also be needed. We do not support AEMO's intent to encourage any affected party to carry out maintenance during DNSPs planned outages, nor the proposed solution of providing retailers and MCs with additional advanced notice.

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<sup>1</sup> AEMO; Strengthening Metering Compliance and Improving UFE Allocation Fairness;  
<https://www.aemc.gov.au/sites/default/files/2025-10/Rule%20change%20request%20-%20Strengthening%20Metering%20Compliance%20and%20Improving%20UFE%20Allocation%20Fairness%202025.pdf> p. 4

**2. Administration and logistics:** Ausgrid also has concerns about the additional workload for DNSPs which would be required to notify and manage subsequent inquiries from retailers and MCs of planned outages. In particular, we note:

- a. The timing of planned outages can change from the time they are first entered into a DNSP's systems to the time they take place – any initial requirement to notify third parties of planned outages would need an accompanying requirement to notify them whenever a planned outage is changed or cancelled. AEMO's rule change proposal is unclear on how far in advance notice should be provided, nor on how updates to initial plans would be communicated.
- b. It is unclear from AEMO's proposal whether the notification requirements would apply only to outages affecting large customers with high voltage metering installations, who are the customers affected by the other components of the rule change proposals, or whether AEMO expects DNSPs to notify retailers and MCs of all planned outages.
- c. There would be resourcing, staffing and IT system cost implications for DNSPs arising from this requirement which are not addressed in the proposal. IT systems are not presently set up to provide this information in a readily accessible and updateable way.

In Ausgrid's view, the other proposed rule changes being considered in this consultation, including the other components of AEMO's proposed changes, could be advanced without imposing a requirement on DNSPs to notify retailers and MCs of planned outages above the notifications currently published in accordance within the NER. We strongly recommend the AEMC considers the safety and administrative impacts of AEMO's proposed outage notification requirement before progressing this component of AEMO's rule change request further.

We welcome further collaboration with the AEMC and industry on this rule change consultation. Please contact Simon Moore, Senior Policy Advisor at [simon.moore@ausgrid.com.au](mailto:simon.moore@ausgrid.com.au) should you wish to discuss further.

Regards,

A handwritten signature in black ink, appearing to read 'M Chandler'.

Murray Chandler  
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