

21 January 2026



Ms Anna Collyer
Chair
Australian Energy Market Commission
Submitted via email

Project Reference Code: ERC0419

Dear Ms Collyer

Supporting compliance with meter maintenance obligations

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) on its supporting compliance with meter maintenance obligations consultation paper.

The attached submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);
- Regional service delivery Retailer, Ergon Energy Queensland Pty Ltd (EEQ); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Metering Dynamics Pty Ltd trading as Yurika Metering.

Energy Queensland is appreciative of the AEMC's consideration of the rule change proposal submitted by Yurika Metering and the recognition of the challenges faced by Metering Coordinators (MCs) in achieving full compliance with meter testing obligations under the National Electricity Rules (NER). Compliance with instrument transformer testing obligations is a long-standing issue in the National Electricity Market (NEM), and without changes to the current framework safety, security and financial costs associated with untested instrument transformers will persist.

Energy Queensland supports Yurika Metering's proposed solution, as it appropriately shares the regulatory compliance burden for meter testing between the large customer as the owner of the equipment, and the MC as the technical expert. Energy Queensland wishes to highlight that in some instances, the instrument transformer is owned by the DNSP through legacy arrangements and DNSPs are unwinding these arrangements. The feedback provided below is only in relation to instances where the large customer owns the instrument transformer.

Energy Queensland's more detailed comments in response to the questions posed in the Consultation Paper are set out in the stakeholder feedback template at **Attachment A**. Neither this letter nor our enclosed comments contain confidential information and may be published. Further, the views and feedback contained within this submission are those of Energy Queensland, and do not necessarily reflect Queensland Government views.

Energy Queensland welcomes further opportunities to contribute to this consultation and looks forward to working collaboratively with the AEMC and other stakeholders on an optimal solution. Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me at the contact details below or Charmain Martin on 0438 021 254.

Yours sincerely



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Enc: **Attachment A** - Energy Queensland's comments in the stakeholder feedback template.

ATTACHMENT 1

Consultation paper: Supporting compliance with meter maintenance obligations

STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

To submit this form, follow this link, and select the project reference code RRC0070 or ERC0419.

SUBMITTER DETAILS

ORGANISATION: Energy Queensland Limited

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DATE 21 January 2026

PROJECT DETAILS

NAME OF RULE CHANGE: Supporting compliance with maintenance obligations

PROJECT CODE: RRC0070 and ERC0419

PROPOSER: Yurika, Intellihub, PLUS ES, AEMO

SUBMISSION DUE DATE: January 15 2026

CHAPTER 2 – THE RULE CHANGE REQUESTS PROPOSE CHANGES TO THE METER TESTING AND INSPECTION FRAMEWORK

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

<p>a. Do you agree that MCs face challenges in meeting their testing and inspection requirements? For example:</p> <ul style="list-style-type: none">i. accessing customer sitesii. arranging activities with retailers and large customers to complete testing and inspection activitiesiii. recovering the costs of testing and inspection activities. <p>b. Do you agree that the current process for MCs to obtain test certificates is inefficient?</p>	<p>a. Energy Queensland agrees with Yurika Metering's identification of the key challenges Metering Coordinators (MCs) face in meeting their testing obligations, including:</p> <ul style="list-style-type: none">• Accessing the appropriate customer contact details to arrange testing can be a lengthy process with considerable logistical complexity and costs. Due to the periodic nature of instrument transformer testing (i.e. 10 years) relevant customer contact details can be difficult to obtain by the time testing occurs again. Further, the complex nature of testing requires liaising with a customer contact with appropriate site knowledge and authority to approve testing.• MCs require physical access to the customer site to complete testing. Further, testing crews complete site-specific inductions to undertake testing, which requires logistical planning and must be coordinated with outage dates. Without customer consent and cooperation, testing is not feasible.• Testing requires electricity supply to be disconnected to the customer's premises. Outages can be highly complex, requiring coordination of multiple stakeholders, including the customer, retailer, DNSP and MC. While most parties are co-operative in assisting MCs to arrange testing, others are less so.• Testing can be financially prohibitive both due to testing costs and operational disruptions to the customer from disconnection of electricity supply. However, once a customer formally agrees to undertake testing, Yurika Metering generally does not experience issues with recovering costs from the customer. <p>b. Energy Queensland considers the current process for MCs to obtain test certificates could be streamlined for efficiency by creating a centralised online repository for test certificates to be uploaded against NMIs and accessed by relevant parties. In Yurika Metering's experience, if the customer does not have the test certificate readily available, the process to obtain the test certificate can be lengthy and labour intensive.</p>
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Question 2: Do you agree with Yurika's proposed solution?

<p>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?</p> <p>b. What are the benefits and risks the Commission should consider in assessing this solution?</p>	<p>a. Energy Queensland is supportive of Yurika Metering's proposed solution as it appropriately shares the regulatory compliance burden for meter testing between the large customer as the owner of the equipment, and the MC as the technical expert. We also consider the proposal introduces a level of de-energisation risk that is consistent with existing provisions for small customers under Part 6 of the National Energy Retail Rules (NERR).</p> <p>b. As Yurika Metering's rule change proposal acknowledges, de-energisation may not be an appropriate solution in circumstances where the large customer provides essential services, or where the instrument transformer is not owned by the large customer. In these instances, the AEMC may wish to consider relaxing the testing obligations on MCs from an absolute to a best endeavours framework, as a more holistic solution.</p>
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Question 3: Do you agree with PLUS ES' proposed solution?

<p>a. Is it appropriate for the rules to prescribe that contracts between MCs and retailers or large customers include testing and inspection services?</p>	<p>a. Energy Queensland does not consider this solution will suffice to address the root cause of the challenges MCs face. As outlined in Yurika Metering's rule change proposal, Yurika Metering has pursued several options to increase customer co-operation, including amending commercial contracts to include instrument transformer testing. In Yurika Metering's experience, this solution did not improve negotiations with non-cooperative large customers. Additionally, Energy Queensland is not supportive of the proposal to apportion costs for high voltage (HV) current transformer (CT) and voltage transformer (VT) testing into an annual metering services charge, as testing costs vary significantly on a site-by-site basis depending on location, site-specific conditions and the presence of any hazards. This proposal risks customers with less complex testing requirements subsidising customers with more complex meter testing requirements.</p>
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Question 4: Do you agree with Intellihub's proposed solution?

<p>a. Should retailers be required to inform large customers that MCs are required to test and inspect metering installations?</p> <p>b. Should there be a safeguard for cases where a large customer does not</p>	<p>a. Energy Queensland is supportive of Intellihub's proposal to improve customer awareness of HV CT/VT testing requirements and considers it would be beneficial for retailers to assist MCs in communicating the importance of testing. As outlined above, while certain retailers are co-operative in assisting MCs to arrange testing, others are less so.</p> <p>b. While Energy Queensland is supportive of introducing a framework that incentivises large customers to</p>
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<p>fulfil their role in assisting MCs to perform testing obligations?</p> <p>c. Should retailers be required to arrange supply interruptions to assist MCs in performing testing obligations?</p> <p>d. Should the previous MC be required to provide a copy of test certificates to the new MC?</p>	<p>cooperate with MCs to undertake meter testing, we consider Yurika Metering's proposed solution is a more appropriate pathway to achieve this. Intellihub's proposal risks placing significant testing costs on MCs without appropriate authority to recover costs from customers who are forced to undertake testing. Also, forcing an outage as a last resort where customer agreement is not obtained could create significant safety hazards and risk equipment damage. For example, isolating smelters without customer agreement could result in metal slag being left in buckets, causing irreparable damage. We consider LNSPs should not be required to manage and coordinate the supply interruption process given it creates unnecessary regulatory and procedural complexity.</p> <p>c. Energy Queensland considers the current process of allowing customers to engage with LNSPs directly to organise supply interruptions for business-as-usual testing is the most efficient process without third party involvement.</p> <p>d. The creation of an online repository or database for relevant parties to obtain current test certificates is an improvement on the current process. At a minimum, the previous MC should be required to provide a copy of test certificates to the new MC upon confirmation of the role nomination in the market.</p>
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Question 5: Do you agree with AEMO's proposed solution?

<p>a. Should the definition of 'metering installation' in the NER be changed to explicitly refer to a compliant and verified installation?</p> <p>b. Should retailers be required to assist MCs in meeting their testing and inspection obligations within a specific time?</p> <p>c. Should the UFE methodology be changed so that retailers with non-compliant metering installations at their connection points would bear a</p>	<p>a. Energy Queensland questions the impact of changing the definition of 'metering installation' on the issues identified by MCs.</p> <p>b. In relation to retailer assistance to undertake required testing, Energy Queensland supports strengthening collaboration between retailers and MCs to ensure meter testing obligations are met. As outlined above, while certain retailers are co-operative in assisting MCs to arrange testing, others are less so.</p> <p>c. Energy Queensland is concerned AEMO's proposal to allocate a greater portion of UFE to retailers with non-compliant metering installations places financial burdens on retailers without creating appropriate incentives or consequences on large customers to comply with meter testing obligations.</p> <p>d. While Energy Queensland considers advanced notice of LNSP planned outages may assist MCs in</p>
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<p>proportionally greater share of UFE?</p> <ul style="list-style-type: none"> • Are there any unintended consequences in changing the allocation of UFE? <p>d. Should LNSPs be required to provide advance notice of planned outages to assist MCs in planning testing and inspection activities?</p>	<p>coordinating HV testing with other planned work, we are concerned that this may increase risks associated with multiple parties working on or near the same equipment, and complexities of switching and access requirements. As such, coordination should be managed on a case-by-case basis.</p>
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CHAPTER 3 – INTELLIHUB PROPOSE CHANGES TO THE EXEMPTION FRAMEWORK FOR MALFUNCTIONS

Question 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?

<p>a. Do you agree that there are scenarios where MCs cannot repair malfunctions that are:</p> <ul style="list-style-type: none"> • individual failures within 30 business days? • family failures within 140 business days? 	<p>a. In Yurika Metering's experience, there are scenarios where MCs cannot repair malfunctions within the required timeframes. For example:</p> <ul style="list-style-type: none"> • Old switchgear may require specific parts that can be difficult and lengthy to source. • The physical space required to house replaced or upgraded equipment may need to be upgraded to extend switchboards or switch rooms. • Repair or purchase costs may be outside customer budgets and therefore funds are not available to repair or purchase equipment within the required timeframe. • Site access may be difficult or delayed due to locks, abandoned sites, the presence of hazards or natural disasters. • Certain family failures can require large volumes of meters to be replaced. Whilst the recent consultation on AEMO's changes to the exemption process and introduction of Metrology Procedures Part C noted limiting family sizes to better manage meter replacement programs, stock availability, ordering, purchasing and delivery may not be possible within the 140 days' timeframe. <p>Energy Queensland considers MCs submission of rectification plans, including timeframe requirements for malfunctions, should be reviewed and considered on a case-by-case basis.</p>
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Question 7: Do you agree with Intellihub's proposal for the NER to specify what AEMO must consider in the Exemptions procedure?

<p>a. Should the NER define scenarios, guidance, or principles that AEMO must consider when considering an MCs' application for an exemption? If so, what?</p> <p>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?</p>	<p>a. Energy Queensland agrees defining scenarios, guidance or principles for AEMO to consider when assessing an MC's application for an exemption is beneficial in the majority of cases. However, exceptions to the norm occur, and a provision should be included in the NER to consider these exceptions individually as they are identified in the MC's rectification plans.</p> <p>b. In relation to extensions, Energy Queensland agrees MCs should be able to apply for extensions where the MC's ability to rectify malfunctions within the initial time allocation is impacted by:</p> <ul style="list-style-type: none"> • High volumes (family failure). • Complex malfunctions requiring detailed technical investigation. • Customer or third party engagement to assist with rectification activities.
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CHAPTER 4 – MAKING OUR DECISION

Question 8: Assessment framework

<p>a. Do you agree with the proposed assessment criteria?</p> <p>b. Are there additional criteria that the Commission should consider or criteria included here that are not relevant?</p>	<p>No comment.</p>
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